



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.

July 29, 2016

Environment and Parks
Regulatory Approval Centre
Main Floor, Great West Life
9920 108 Street
Edmonton AB
T5K 2M4

Re: Application Number 001-00381655 – Reconstruction of Harvey Passage (Bow River)

The Calgary River Forum Society (Calgary River Valleys or CRV) is a stewardship organization whose values and mandate are to champion the protection and enhancement of our rivers, riparian zones and their functionalities/contributions, including biodiversity. The organization operates on a collaborative basis representing relatively diverse interests including many who live in river edge communities some as close 400 metres to this site within the community of Inglewood. They include paddlers, birdwatchers, fishers, cyclists etc. Many are or have been involved in educational programming and stewardship activities. CRV actively participates in planning and policy issues that affect the river and river valleys.

Calgary's river corridors have become the primary concession that the City of Calgary has provided to natural functionalities and biodiversity as the City has intensified urban development and as suburbanization spreads through the major corridor where foothills meet prairie through southern Alberta. Over the past twenty years governments have developed policies which recognize these values and have suggested protective measures including setbacks, passive rather than active recreation, restoration and more sensitive development criteria. At this site, there has been a growing awareness of the value of the river and riparian environments. The reconstruction of Harvie Passage is seen as an opportunity to optimize the environmental contribution of this reach of the river.

We ask your consideration of the following comments:

1. Members of our organization were involved in the original funding and research of the exploratory process that led to an agreement to modifications to the weir. The original purposes of investing in the changes to this weir were to facilitate safe convenient boat passage, to provide fish passage upstream and to provide some re-naturalization of the river corridor at the weir location. The project as has been designed appears to have given higher priority to sporting activities perhaps to the detriment of safe and convenient passage for the much larger public user groups. Concerns have been raised that this project does not fulfill the potential that is expected from this kind of



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investment and the opportunity presented to protect, regenerate, and improve the contributions that should derive from this reach of the river.

2. The apparent goal of the project has been to reconstruct, including the opportunity to reconfigure, the passageway along the river without further reduction of the overall natural environmental characteristics including fish habitat and passage. Those members who have been able to access the Biophysical Impact Assessment (BIA) have commented that :
 - a. The comparative assessment undertaken by the BIA of potential of the new reconstruction relative to environmental contributions was against the former constructed boat passage (2012) plan which in itself was a considerable reduction from what a natural environment would have provided at this location.
 - b. It was noted that the overall improvements in fish habitat values (weighted habitat units) for the three indicator species was on average less than one percent. This is low enough that in most such reviews it would be within the margin of error. While this suggests that the reconstruction will be no worse than current conditions, the opportunity to create an improved environment would be lost.
 - c. A significant amount of increased fish habitat values in the new reconstruction has been identified as existing in the recreating of the “portage channel”. This suggests that there is likely a loss of fish habitat value (WHUs) in the main river streams.
 - d. The proposed newly reconstructed “portage channel” is questioned as an actual portage channel as its purpose as a portage route has been negated or marginalized and perhaps it should be otherwise identified.

3. We have noted that the avian list is only for “Breeding Bird Species Potentially Occurring in the Study Area”. Apparently this reach of the river has always been rich in avian species, especially fish dependent birds. During the many decades of the weir existing without “passage” – prior to 2010, the area was well known for iconic species – pelicans, merganser, cormorant, osprey, blue heron and similar, which were a valued and respected local attraction and tourist draw. Some of these species are not listed within the BIA. Much of this avian activity left the area with the introduction of the Harvie Passage earlier version, although some species have returned subsequent to the 2013 flood, possibly because of the lack of the interim on-water and shore disturbances which are a part of the play boating activity.

4. The assessments made in the BIA did not appear to consider the intent of stakeholder users to utilize the new structure as a play boating venue involving considerable human activities on water, in shallows, and on the riverbanks. There are many habitat features in immediate proximity of the project which the modelling would have simply accepted as positive contributory elements of some environmental functionalities. These positive contributions will be marginalized or negated by the intentions of the user groups including training and competition events. The scope of the BIA is



insufficient if it does not assess those impacts and the full scope of activities that may be attracted to this venue. The BIA should also address matters in terms of cumulative impacts regionally.

5. The ability to ensure that our rivers and river corridors will provide the highly desirable services, environments, biodiversity, etc. that we value as urbanization/suburbanization grows and as recreational appetite for outdoor experiences grow, will depend on our willingness and ability to manage the competing interests. At this location, the time has come where some management interventions should be made to ensure that those basic natural assets are protected and restored.
6. Some members of the Fishing community have indicated that their opportunities within this site have been reduced.
7. Several river users have indicated that the proposed passageway is providing an amenity and convenience primarily for play boating without adequate concern for the safety of the less experienced river users. Please see attached copy of our letter of July 19, 2016 regarding the Navigation Protection Act.
8. Members who were involved in the planning for the original Harvie Passage (2012) recall that:
 - a. during the negotiation and consultations about the design of the original Harvie Passage, the possibility of providing the play boating/training/competition activities at a location on the Western Irrigation District Canal just east of Calgary with a greater vertical drop and potential for play boating and white water activities was considered but apparently not pursued by the boating representatives.
 - b. at final meetings, after encountering unforeseen necessary changes to river corridors involving impacts on Pearce Estate Park and after acknowledging probable environmental and social impacts including shoreline degradation, vehicle parking, and other elements of possible overuse, a majority of the stakeholders agreed that the this reach of the river should be managed as a passageway and not as a play boating, training or competition destination.

Those members who have participated in this review have suggested that the plan for reconstruction of Harvie Passage be revisited and revised with higher priority assigned to environmental restoration and contributions, and to safety/convenience for all river user groups.

A comment on process - this Notice of Application with a seven day deadline for submission of comment was provided through Calgary newspapers on Friday July 22, 2016 and was available to our offices on Monday July 25. That was the earliest date we could request further information referred to in the notice. The Biophysical Impact Assessment was made available to us on Wednesday July 27, 2016. Therefore our ability to consult with our members and to arrive at an informed and wide spectrum of comment has been limited. We were granted opportunity to meet with representatives from Alberta Transportation and Klohn Crippen Berger as



the consultant to the project and author of the BIA. This meeting was not possible until the afternoon of July 28. Once again, this short time frame gives little opportunity to consider the implications of the project, visit the site, consult with our members and partners and prepare a submission. We suggest a longer notice period for projects of this scope and complexity.

We would be pleased to provide further information. Thank you for your consideration of these comments.

Yours truly,

Michael Kenny
President, Calgary River Valleys

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

Encl.

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