



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 26, 2017

Nicole Sparks
Leader, Monitoring & Compliance
Utilities & Environmental Protection
The City of Calgary
Sent via email to: Nicole.Sparks@calgary.ca

Dear Ms. Sparks,

Thank you for the opportunity to review the proposed new revisions to the Erosion & Sediment Control Guidelines. With some exceptions, our members are not direct practitioners in this industry, but our mandate, activities, and projects are impacted by land uses, stripping and grading, excavation, etc. and the practices to mitigate erosion, sedimentation, and their impacts to air, water, wetlands, and habitat. Without workshops or similar in-depth review in incorporating industry realities and other related regulation requirements, we are electing at this time to make selective comments, which were received from our responding members and associates.

We are pleased at and support attempts to simplify and clarify the application process but also have the following general comments:

- a) That the simplification should not reduce the level of water erosion control, dust control, and protection of natural areas, and
- b) That the reduced requirements for explanation and illustration on each application should not reduce the ability of affected parties, neighbours, decision-makers, and the public to understand and assess the applications and plans in each case.

Specific comments received from our members and associates include the following:

- 1) Concerns for what appears to be a very significant tolerance of soil loss (2 tonnes per hectare **per** year) and questions regarding how this can be reduced or discouraged,
- 2) Concerns that the proposed changes would remove several control factors including the use of live stakes as being impractical practices in Calgary. Our experience is that proper use of live stakes can be effective to protect and stabilize certain types of terrain and sloped areas, while providing other value. This would apply to lands subject to water impacts and other destabilizing factors, for locations which may be awaiting longer term development and landscaping.



Calgary River Valleys
www.CalgaryRiverValleys.org
calgaryrivervalleys@outlook.com
403-268-4867

P.O. Box 2100, Station M, #64; Calgary, Alberta T2P 2M5

- 3) Concerns that the general practices of protecting wetlands and watercourses from possible erosion and sediment deposits do not adequately address those wetlands which are assessed as “Seasonal” and “Ephemeral”, and which are therefore not always protected under the Water Act. Given the relatively severe and widespread impact of development within the City on wetland functionality (filtering, recharge of groundwater and aquifers), it is suggested that these City Guidelines would be a relevant place for our Municipality to better ensure that natural water flow is maintained on sites to enable Ephemeral, Temporary, and Seasonal wetland areas to fulfill their important functions, especially during high rainfall and melt-water months.
- 4) Concerns regarding the requirement for temporary cover allows for 30 days of “inactivity” on stripped or open excavation areas before temporary cover or protection is required.
 - a. Given Calgary is subject to, on average, 1 significant precipitation event per month, this 30 day duration will allow at least some water erosion in most cases and more wind erosion than is necessary. It is suggested that the more common standard of a maximum 7 to 10 days of “inactivity” be allowed before temporary cover is required, with up to 30 days of “inactivity” allowed only in special circumstances and with special conditions and terms, perhaps including added costs and / or fees.
 - b. Similarly, concerns were expressed for the very substantial one year of “inactivity” until permanent cover required. It is suggested that there be a requirement for at least substantial temporary cover during the first year, beginning at 7 to 10 days from stripping and grading. This assumes that temporary and mitigating provisions would also be in place during the 6 to 12 months while permanent cover is developing or maturing.

Our members would be pleased to attend any information sessions or workhops you may be holding regarding this issue. We would also be pleased to discuss our concerns further with you. Feel free to contact us by email to CalgaryRiverValleys@outlook.com or by phone at 403-268-4632.

Sincerely,

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

Cc: CRV Board & Circulation