



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.

August 28, 2018

Attention: **Alberta Environment and Parks**  
**Regulatory Approvals Centre**  
Sent via email to: [aep.waapplications@gov.ab.ca](mailto:aep.waapplications@gov.ab.ca)

### STATEMENT OF CONCERN

Re: **Water Act Application to Permanently Disturb (Infill) 3 Wetlands by Country Hills Communities Inc.**  
Location: **SE 26-025-01-W5M in Country Hills, Calgary**  
File #: **001-00408149**

Calgary River Valleys or CRV (aka Calgary River Forum Society) is a legally constituted not-for-profit environmental stewardship organization in Calgary whose main focus is stewardship of Calgary's rivers, valleys, creeks and wetlands. Our organization was formed by the City of Calgary in 1991 under our original name as the River Valleys Committee of Parks Foundation Calgary. Our society works on a collaborative basis with many individuals and organizations who work to protect river-edge and river-adjacent areas. We have members and partners in all areas of Calgary, including along Nose Creek.

CRV (and its predecessor, the River Valleys Committee) is considered an informed stakeholder group on watershed stewardship issues. As such, we were tasked by Calgary City Council to provide independent and informed input to urban planning and development proposals in Calgary. Our organization has participated as a stakeholder in numerous projects involving various rivers, creeks, and streams in Calgary as well as on development of policies for the City of Calgary. These include policies on the issues of open space, wetland and biodiversity protection, the Nose Creek Watershed Water Management Plan, storm water management, and erosion and sediment control. CRV has also worked on a variety of projects with the Bow River Basin Council, which is the local Watershed Planning Advisory Committee (WPAC).

Our organization served as an exterior stakeholders in the development of and the 2018 update of the Nose Creek Watershed Water Management Plan (NCWWMP). The NCWWMP (2018) has noted that the water quality of Nose Creek is classified only as "fair", and that "preservation of natural features is critical to improving water quality in the Nose Creek watershed. Features include ... riparian areas (including wetlands, and ephemeral and intermittent creeks), coulees, valleys, and escarpments," (from pg. 28 of the document, attached). The NCWWMP (2018) has also noted that Best Management Practices (BMPs) should be prescribed when working around riparian areas in the Nose Creek watershed, and "Development plans that may impact Nose Creek,



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West Nose Creek or an associated tributary should demonstrate why disturbance cannot be avoided through either relocation or redesign and how impacts will be mitigated,” (from pg. 32 of the document, attached).

This letter is to register our concerns about the application to infill 3 wetlands on the lands located at SE 26-025-01-W5M in Calgary which is in the Nose Creek corridor. We were only able to secure some initial documentation for this file on August 27, 2018, and have received late today some additional documentation for review, but have not had time to review this documentation in significant detail.

We understand that this Water Act Application is to request permission to infill part of Wetland #3, as well as all of Wetlands #1 and #2 in order to accommodate development, as outlined in Figure 1 of the Wetland Assessment and Impact Report (WAIR, excerpt attached). We further understand the City of Calgary has required a minimum 50 metre buffer for Environmental Reserve (ER) land adjacent to Nose Creek at this location. We have not had sufficient opportunity to review the full Wetland Assessment and Impact Report or other broader documentation which was received late today.

However, our preliminary concerns and questions about this application include the following:

1. Notwithstanding that we believe the 50 metre minimum buffer for Environmental Reserve lands may in fact be insufficient to minimally accommodate the functionality of the wetland complex in these lands, the Figure 1 map created by Ecotone Environmental shows the boundary for the Environmental Reserve is in fact substantially less than 50 metres from the northeast bank of Nose Creek. Using the scale provided on that map, the distance from the creek to the edge of the developable land appears to be short of the required minimum 50 metres by anywhere between 5 and 15 metres in various locations.
2. Using that same scale to measure to Wetland #3, it appears that all of Wetland #3 should in fact be included within the 50 metre ER buffer, and suggesting that no part of that wetland should be infilled. Further, the southern portion of Wetland #2 would also be captured by the 50 metre buffer of Environmental Reserve lands, and that portion should therefore be protected from infilling.
3. Reasonable protection of the wetland functionalities would suggest a further setback is required from the edges of the wetlands that are intended to be retained, namely Wetlands #3, 4, and 5, and part of Wetland #2. This level of detail to avoid development impacts in the protective setback areas from these wetlands may be outlined in other documentation but we have not been provided information to suggest this is the case. Is any setback from the wetlands (those which are intended to be retained) planned for this development? If so, what is the expected distance and criteria of that setback?
4. Has a study been done on the ancillary impacts of infilling these wetlands on the downstream functionalities of Nose Creek and the other nearby wetlands? Ancillary impacts could include losses or changes to groundwater, vegetation, springs and seeps, habitat, and the larger aquifer.
5. Has a study been done on the cumulative impacts of infilling these wetlands on the downstream functionalities of Nose Creek and the other nearby wetlands? Cumulative impact studies would

recognize that this development is one of many existing and planned for this area along the Nose Creek corridor. We note that in this subject site, that over 90% of the defined wetlands area is proposed for destruction.

6. What will be the destination of the water that is being removed from the wetlands, i.e. is it going into a pipe, and if so, where will it be flowing?
7. How will the natural water and storm water on the site be managed so it can improve the water quality in Nose Creek, to comply with the Nose Creek Watershed Water Management Plan?

After we have reviewed the documentation for this file that we received today in more detail, we may have more concerns, but we would appreciate it if someone could contact us with a response to our preliminary questions and concerns outlined above. You can reach our organization at the mailing address on this letterhead, or by phone to 403-268-4632, or by email to my attention at [CalgaryRiverValleys2@outlook.com](mailto:CalgaryRiverValleys2@outlook.com).

Sincerely,

Bill Morrison, Vice President  
Calgary River Valleys (Calgary River Forum Society)

Cc: CRV Board & Circulation  
Nose Creek Watershed Partnership  
Jyoti Gondek, Calgary City Councillor Ward 3  
Jamie Kleinstuber, MLA Calgary-Northern Hills  
Northern Hills Community Association  
Joshua de Jong, City of Calgary Planner, Stripping & Grading Application DP2018-0015