

From: [Brown, Quincy](#)
To: [Public Hearings Shared](#)
Subject: [EXTERNAL] - FW: Public Hearing Submission: Residential Conceptual Scheme - Riverside Estates (Bylaw 8016-2020)
Date: July 27, 2021 2:05:59 PM
Attachments: [07 14 2021 Public Hearing Submission City of Calgary FINAL \(002\).pdf](#)

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Good morning, please find attached letter of submission from The City of Calgary, to be included in the public hearing package and forming a part of the official record for Riverside Estates Conceptual Scheme (Bylaw 8016-2020).

The item is being considered by Rocky View County Council on 07/27/2021 with a public hearing time set for 1:00pm.



07/26/2021

Rocky View County Council
Rocky View County
262075 Rocky View Point
Rocky View County, AB, T4A 0X2

RE: PL20170009 – Public hearing for Riverside Estates Conceptual Scheme, providing a policy framework to guide future subdivision and development proposals within the subject lands.

City File: RV20-02

Dear Members of Council,

The City of Calgary (The City) continues to have concerns regarding the proposed Riverside Estates Conceptual Scheme and potential detriment to the Bearspaw Reservoir, the drinking water supply source for 1.4 million City and regional customers. The City's specific concerns regarding the proposal have been communicated through intermunicipal correspondence dated April 2, 2020 and January 27, 2021, copies attached.

Sustainable regional planning and development are shared outcomes for both Rocky View County (RVC) and The City of Calgary. The City appreciates collaborative efforts to date, however, The City continues to have concerns on the Riverside Estates Conceptual Scheme given the close proximity of the development to the Bearspaw Reservoir and the extremely short water treatment response time The City would have to react to a contamination event from the proposed development.

In order to address the significant concern of water contamination The City requests the opportunity for further discussions with RVC regarding the technical analyses of proposed water, wastewater and stormwater management systems that are contemplated in the proposed Conceptual Scheme.

In its responses back to The City, it remains unclear how RVC, as the development authority, will ensure that development will not have a detrimental effect on the drinking water quality of the Bearspaw Reservoir. The City has identified three areas of deficiencies in the application:

1. SD Consulting Group provided a memo (May, 2021) outlining the linkages between the proposed wastewater system, existing ephemeral stream, groundwater and Bearspaw Reservoir, which was submitted in response to The City's previously identified concerns. The City is requesting the opportunity to meet with the consultant, applicant and RVC Administration to review the memo and the technical analyses that have been conducted to support SD Consulting Group's statements.

2. It does not appear that appropriate development controls and water quality monitoring protocols are included in the application submission to ensure that water quality of the Bearspaw Reservoir is not impacted by the development at full build out.
3. The conceptual scheme does not currently show alignment to the Calgary Metropolitan Region Board (CMRB) Interim Regional Growth Plan, The City and RVC Intermunicipal Development Plan or the Bearspaw Tri-lateral Consensus Report.

In the spirit of working together, The City requests further collaborative administrative meetings occur prior to second reading through the provisions outlined within the resolution of intermunicipal matters, Section 15.3 of the Intermunicipal Development Plan. Should RVC give second reading to the proposal, Calgary requests mediation on the Conceptual Scheme.

Finally, RVC should consider the following higher order guiding policy statements prior to rendering a final decision, which include:

- The City of Calgary, Rocky View County Intermunicipal Development Plan section 11.1.1 commits:

Both municipalities should manage for the long-term quality and quantity of municipal drinking water supplies including: (a) Protection and enhancement of surface water sources, watersheds, and waterways; and (b) Protection of groundwater including groundwater recharge areas.

- The CMRB Interim Growth Plan identifies as Principle 2, *to protect water quality and promote water conservation*. More specifically, Policy 3.2.3 a. states that all statutory plans shall *protect source water quality and quantity in accordance with federal and provincial legislation and regulations, promote water conservation and incorporate effective stormwater management*. Without information to demonstrate the contrary, the proposed Conceptual Scheme is in direct conflict with this policy as the proposed development will mobilize contaminants downstream to the Bearspaw Reservoir and Bearspaw Water Treatment Facility.
- The CMRB and Interim Growth Plan identifies the Bearspaw Reservoir as Regionally Significant Infrastructure on Schedule 5: Transmission Corridors – Water. Policy 3.5.2.1c states that *mitigation measures and policies shall be provided to address identified / potential adverse impacts on regionally significant transmission corridor right-of-way or related infrastructure*.
- The Bearspaw Task Force Trilateral Consensus Report, approved by RVC Council (July 2019), outlines that stormwater runoff from developed land uses contain a wide range of

The logo for the City of Calgary, featuring the word "Calgary" in white text on a red rectangular background.

contaminants that can pose threats to drinking water quality. As upstream growth continues, cumulative stormwater runoff from developed lands poses increasing risks to source water quality in the Bearspaw Reservoir and Bow River. The report states that while balancing and accommodating land use change, municipalities should be evaluating and implementing enhanced stormwater design requirements in source water areas to reduce the risk of polluting drinking water supplies.

- The City of Calgary is recommending that, if RVC Council gives second reading to the Area Structure Plan amendment, that it be submitted to the CMRB for review. The potential impact to regionally significant infrastructure should constitute that this development is regionally significant.

Based on the information before RVC Council, The City recommends refusal of the application in its current form. The City looks forward to the opportunity to initiate mediation pursuant to Section 15.3 of the Intermunicipal Development Plan.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Carolyn Bowen".

Carolyn Bowen A/Director for

Francois Bouchart, PhD, P.Eng
Director, Water Resources
Utilities and Environmental Protection