



January 31, 2025

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

**RE: Draft Springbank Area Structure Plan – Circulation response**

Dear Dominic Kazmierczak and Andrew Chell,

The City appreciates the continued efforts of Rocky View County Administration to address The City's concerns on the Springbank Area Structure Plan (ASP). The City is concerned about detrimental impact to the source water quality in the Bow and Elbow Rivers that will result from the substantial amount of planned lands and subsequent development adjacent to these regionally significant water amenities. Notably, the development area is upstream of Calgary's two water treatment plants and reservoirs. The impact of development needs to be better understood at the ASP stage of planning which is challenging given the lack of servicing strategy and technical studies to illustrate how the area will be serviced with water, sanitary, and storm utilities.

**Servicing:**

It remains unclear how Rocky View County intends to provide wastewater servicing to the plan area. The ASP does not provide details or policy direction on how a robust servicing strategy will be established. A servicing strategy would provide clarity on the sequencing of development while helping The City understand potential source water impacts.

In the absence of servicing details or a strategy, The City's perspective is new wastewater outfalls within the area of the ASP would be expected to degrade source water quality and potentially lead to water treatment challenges and the possibility of water treatment plant upgrades. Similar issues were raised when an outfall to the Bow River for the community of Harmony was being considered.

Decentralized septic systems pose a risk to water quality when systems are in proximity to a surface waterbody or conveyance route (including via groundwater) that may introduce contaminants such as nitrogen, pathogens and micropollutants close to a drinking water source. In these cases, such systems should be avoided.

**Stormwater:**

As upstream growth continues, stormwater runoff from developed lands poses increased risks to source water quality. The location of stormwater discharges is critically important in mitigating risk; and new discharges that could impact source water quality must be avoided entirely.



### **Special Planning Areas:**

The inclusion of Special Planning Area #3 (and the use of special planning areas in the future) in the ASP is a positive step towards further collaboration and coordination on source water protection. Development proposed in the Special Planning Area #3 should be carefully evaluated for impacts to the water quality of surface water and groundwater prior to the next stage of planning.

The City requests an opportunity to collaborate with Rocky View County on developing new policies to be included in Special Planning Area #3. This type of collaboration would signify a commitment to mitigate the risks outlined in this letter. The addition of policies that require technical analysis combined with circulation and feedback mechanisms will allow our municipalities to review impacts on source water while finding mutually agreeable solutions. For example, policy statements could be included in the ASP that outline that The City should be given adequate opportunities to review and comment on future plans and applications, and all relevant technical supporting studies including, but not limited to, servicing studies, master drainage plans, hydrogeology studies, and river mixing analyses. Policies that direct circulation timelines allowing for sufficient time for intermunicipal discussion need to be included in the ASP. These amendments must be completed before Rocky View Council passes 3rd reading of the ASP. This will provide more certainty that impacts to source water quality have been assessed, options have been evaluated, and avoidance or mitigation measures are identified where necessary.

If there is an unwillingness to commit to strengthening the policies and technical requirements within the Special Planning Area #3 section of the ASP, The City requests that the application be referred to the next Rocky View County, City of Calgary Intermunicipal Planning Committee meeting as described in the Rocky View County – City of Calgary Intermunicipal Development Plan as stage 2 of the resolution of a municipal matter. Should Rocky View County Council move forward in their approval process based on the current ASP content, The City requests that Rocky View County enter mediation with The City to resolve outstanding concerns.

The City looks forward to continuing our collaborative efforts on the Springbank ASP.

Sincerely,

Quincy Brown, Senior Planner, Regional Planning

CC:

Karen Holz, Manager Regional Planning,

Nicole Newton, Manager Natural Environment and Adaptation

Carolyn Bowen, Director Climate and Environment,

Kathy Davies Murphy, Director City and Regional Planning

Debra Hamilton, General Manager of Planning and Development Services



# ROCKY VIEW COUNTY

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

403-230-1401  
questions@rockyview.ca  
www.rockyview.ca

March 3, 2025

Quincy Brown  
Senior Planner  
City and Regional Planning  
The City of Calgary

Via email: Quincy.Brown@calgary.ca

**RE: Draft Springbank ASP Circulation – January 2025 (City File RV34-24)**

Dear Mr. Brown,

Thank you for The City of Calgary's (The City) comments on the draft Springbank Area Structure Plan, dated January 31, 2025. We appreciate the continued collaboration between The City and the County in refining the draft Springbank Area Structure Plan (ASP).

The following responses have been prepared in accordance with the items identified in the previous letter:

### **Wastewater Servicing**

The County understands and shares the City's concerns with source water degradation of both the Bow and Elbow Rivers. Due to the size of the Springbank ASP and the limited intensity of the development proposed for most of the plan area, the County determined that a detailed servicing strategy for the entire ASP is not warranted at this time. Servicing strategies will be determined at the local plan application stage, guided by Policies 20.05, 20.06, and 20.07 of the ASP:

- Private Sewage Treatment systems will not be permitted for any business or institutional use, nor for any residential development on lots smaller than 1.98 acres or where a subdivision creates more than one parcel in the New Residential policy area.

With respect to effluent water quality, any wastewater system must comply with provincial standards, in addition to the County's servicing standards. This is outlined in the ASP under Policy 20.24, and will be evaluated at the local plan application stage (see Appendix B). Decentralized wastewater systems will only be considered where they align with County and provincial standards, and in consideration of the City's circulation comments during the application process. However, a further policy is suggested below to support the County's intent in this respect.

As with the outfall proposals for the Harmony development, the County anticipates any future servicing strategy proposals that are associated with development applications would be a collaborative process between the two municipalities.

### **Stormwater**

The County considers the principles and strategies set out within the 2016 Springbank Master Drainage Plan to still be valid, and since the intensity of development is not proposed to increase substantially, an update to the Master Drainage Plan was not warranted.

In response to the City's comments provided at circulation, policies were included in the ASP stating that stormwater shall not impact the quality of receiving watercourses, at both full build-out and during construction (policies 21.10, 21.12, 21.14). Further, stormwater quality is specifically required to be addressed in detail at the local plan application stage (Policies 21.14 and 27.05(a), and Appendix B).

### **Special Planning Areas**

The ASP includes policy direction that all applications within all the Special Planning Areas will be circulated to the City (Policy 27.08). As with all circulations to the City, any technical studies will be provided along with the application. Circulation timelines are outlined in the Intermunicipal Development Plan between the City and the County. However, the following policy amendments/additions are proposed to confirm the County's willingness to collaborate with the City on future development proposals in Springbank:

#### ***Special Planning Areas***

*27.08 All local plans **applications** and **supporting technical studies** within any of the Special Planning Areas identified on Map 16 shall be circulated to The City of Calgary **for review and comment**.*

*27.09 In preparing future master drainage plans, servicing studies, transportation studies, and any other study to support future ASP amendments or applications within or adjacent to the identified Special Planning Areas, the County shall ensure early collaboration with The City of Calgary to ensure that any cross boundary impacts are considered and addressed to an acceptable level.*

#### **SECTION 14 BEARSPAW RESERVOIR**

##### ***Overview***

*The lands identified as Bearspaw Reservoir on Map 4 and Map 6 are owned by TransAlta for the operation of the Bearspaw Reservoir. With the Bow River providing over half of The City of Calgary's drinking water, the protection of the shoreline adjacent to the Bearspaw Reservoir is critical to preserving water quality. To identify risks and management options for lands along the reservoir, the Bearspaw Reservoir Trilateral Task Force was established between TransAlta, The City of Calgary, and Rocky View County. Development within these lands is restricted, unless identified as a requirement from the Task Force or TransAlta as an individual landowner.*

### Objectives

- Restrict development outside of the recommendations of the Bearspaw Reservoir Trilateral Task Force or TransAlta as an individual landowner.

### Policies

14.01 No redesignation, subdivision, or development shall be permitted on the lands identified as Bearspaw Reservoir on Map 6 unless deemed necessary as an outcome from the Bearspaw Reservoir Trilateral Task Force or if required by TransAlta as an individual landowner.

## SECTION 20 UTILITY SERVICES

### Wastewater

20.25 The provision of a decentralized piped wastewater system in place of a regional piped servicing solution shall only be considered where the applicant has demonstrated that the location, scale, and operation of the decentralized system would limit impacts on source water quality to an acceptable level. The County shall collaborate with The City of Calgary to assess the source water impacts of such proposals.

(renumber subsequent policies)

The County agrees that the matter of source water protection is critically important to the region, and considers that the policies contained within the existing ASP draft and proposed above are a significant improvement over the three ASPs that exist in Springbank today. However, the County would welcome the City sending any further specific amendments that would address the outstanding concerns, and is open to having meetings to jointly draft policy wording and amendments, where necessary.

Administration has been directed to return with the ASP and comments from The City before the end of March. Therefore, we would appreciate your assistance in coming together on this project in the near future.

Sincerely,



**Dominic Kazmierczak** | MRTPI | PMP  
Acting Executive Director of Community Services

262075 Rocky View Point | Rocky View County | AB | T4A 0X2  
Phone: 403-520-6291 | Email: DKazmierczak@rockyview.ca

Copied: Amy Zaluski, Rocky View County  
Andrew Chell, Rocky View County  
Karen Holz, City of Calgary  
Kathy Davies Murphy, City of Calgary



March 11, 2025

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

**RE: Draft Springbank Area Structure Plan – Circulation response**

Dear Dominic Kazmierczak,

The City sincerely appreciates the ongoing efforts and responsiveness of Rocky View County Administration to work together and address The City's concerns on the Springbank Area Structure Plan (ASP). The City was very pleased to see the most recent amendments outlined in your 2025 March 03 letter and provides the following comments.

The City is satisfied our concerns can be addressed collaboratively as the area develops with the addition of Special Planning Areas policy 27.09, the new Section 14 on the Bearspaw Reservoir, and Wastewater policy 20.25.

The City is requesting a clarifying amendment to policy 27.08 to outline timelines and types of applications to be circulated for lands located within the Special Planning Areas of the ASP but not identified within the Policy Area in our shared Intermunicipal Development Plan. The City is requesting amended policy 27.08 include that unless otherwise agreed to by both municipalities, The City shall be given twenty (20) days for development permits and thirty (30) days from the date of receipt to reply to the circulation of applications for statutory and non-statutory plans, land use redesignation and subdivision. The proposed amendment will provide greater certainty for both municipalities and aligns to other circulation processes.

The City is also requesting the inclusion of critical infrastructure as a consideration in proposed Bearspaw Reservoir policy 14.01. The City suggests the following: 14.01 No redesignation, subdivision, or development shall be permitted on the lands identified as Bearspaw Reservoir on Map 6 unless deemed necessary **either as critical infrastructure**, as an outcome from the Bearspaw Reservoir Trilateral Task Force or if required by TransAlta as an individual landowner.

The City's primary concern is that development within the broader plan area may have negative impacts on the Bow and Elbow Rivers depending on circumstances such as location and servicing, which could detrimentally impact the source drinking water for both our municipalities. We acknowledge that this is a matter of utmost importance and appreciate Rocky View County's commitment to protecting both our municipality's drinking water.

The City looks forward to continuing our collaborative efforts on future applications in the Springbank ASP area.



Sincerely,

A handwritten signature in black ink that reads "K. Cave". The signature is fluid and cursive, with the first name "K" being large and the last name "Cave" written in a more compact, cursive style.

Kristine Cave, Planner, Regional Planning

CC:

Sara Kassa, Leader, Regional Planning

Karen Holz, Manager Regional Planning,

Nicole Newton, Manager Natural Environment and Adaptation

Carolyn Bowen, Director Climate and Environment,

Kathy Davies Murphy, Director City and Regional Planning

Debra Hamilton, General Manager of Planning and Development Services