



February 5, 2021

City File: RC20-10

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

SUBJECT: PL20200087, PL20200083, PL20200084 - To amend the Central Springbank Area Structure Plan, adopt the Highway 1 / Old Banff Coach Road Conceptual scheme and redesignate the subject lands – Response #2

Dear Jessica Anderson,

The City of Calgary has reviewed the above noted application in reference to the *Rocky View County/City of Calgary Intermunicipal Development Plan (IDP)* and other applicable policies. The City of Calgary Administration has the following comments for your consideration. The City of Calgary continues to **not support** this application at this time. The proposal is not aligned with the IDP or the Interim Growth Plan (IGP). The City continues to suggest that the application is premature given that The County is updating the Springbank ASPs, which will provide a new policy framework for the area in question. The City requests that further collaboration and coordination occurs on this application and a meeting to discuss how to mitigate the impacts be discussed.

A large amount of The City's concerns were not addressed, nor was a meeting proposed to resolve any of the concerns for the application. A significant urban scale commercial-residential development is proposed immediately adjacent to Calgary as a seamless continuation of Calgary's West View community. The City requests that The County consider the land use, mobility and service impacts of this proposal, and suggests that intermunicipal coordination is needed to support a shared understanding between our municipalities.

Also, a review of the Spring Bank Area Structure Plan is underway. This proposal should be reviewed as part of fulsome review in order to understand the full impact of growth and development on services and provide for the appropriate level of policy support.

The City has the following major concerns with the proposal have not been addressed:

1. Creation of an additional Regional Commercial development along Calgary's boundary

A significant Regional Commercial development is proposed near Calgary's boundary. The nearly 60 acre site "is located to take advantage of the adjacent existing and



proposed residential communities... and support the retail and service needs of future urban growth within a developing area of the County (and Calgary)". 2,320 new permanent jobs are anticipated at the ultimate build-out.

The proposal could impact several existing planned and proposed commercial areas in both Calgary and the County. It is important that our municipalities be intentional with our planning along the Highway 1 Corridor, and understand the implications of what is being proposed here.

- a) There are already several planned / proposed large scale commercial developments along the Highway 1 corridor that can meet the needs of the existing population and future urban growth. Given the existing commercial supply along with a contraction of the retail industry, it is not clear why more retail and service development should be planned for at this time.
- b) In addition, the Conceptual Scheme proposes "primarily retail and service development", commercial uses that would be ideally located within the Springbank Highway Business Area located on Highway 1 and Range Road 33. Proposing commercial development outside of the County Plan approved Highway Business Area could impact its future build-out by diverting complimentary commercial uses away from Springbank's commercial core; and diffusing uses that could otherwise help fill the gaps in the range of offerings in order to create a more diverse, complete and concentrated commercial node for the Springbank community.

2. Potential impacts to City Services

The proposal of another large employment centre on Calgary's boundary has the potential to trigger impacts to City Services. The main issues before our municipalities that are triggered by this proposal are:

a) Transportation Impacts Unresolved

The City remains concerned with potential downstream traffic impacts on City and regional mobility networks and no specific identification of funding needed mobility improvements (i.e. County, developer or identifying potential cost sharing opportunities between our jurisdiction). This application could cause detriment without the proper mitigation for downstream transportation impacts.

b) Supporting local transit service

The proposal does not address transit but would effectively rely on Calgary Transit service due to the routing identified in Calgary's West View ASP. At present our municipalities do not have a cost-sharing agreement with regards to



transit. Without an agreement for transit service for these lands, there is a higher risk of more fiscal impacts to The City, in addition to the transportation impacts on Calgary roadways. The City requests that the County consider the impact that this development has on City services, and that without sufficient agreements we would not be able to support these types of impacts to our municipality.

- c) Supporting the needs of working populations.** While the County benefits from Calgary's nearby work force, The City of Calgary remains the provider for the large range of services needed to support the needs of the working population. Without appropriate agreements in place between our municipalities, The City of Calgary is concerned that additional significant growth near our boundary will increase costs to The City.

Our municipalities need to arrange for a mutually beneficial cost-sharing and maintenance agreement before considering such development proposals.

3. Misalignment with Interim Growth Plan

The proposed amendment to the Central Spring Bank Area Structure Plan (The ASP) is not aligned to the Interim Growth Plan. The Interim Growth Plan states that settlement areas shall provide access to community services and facilities, or make efficient and cost-effective use of existing and planned community services and facilities through applicable municipal agreements with service providers at the appropriate time, where and when appropriate. Sufficient cost sharing agreements are not in place and as a result the application does not align to the Interim Growth Plan. Also, the IGP outlines that collaboration and coordination should occur between the two municipalities. The City requests further collaborations prior to this proposal moving forward.



Water

- The City's source water concerns and cumulative environmental impacts have not been addressed in the Conceptual Scheme or supplemental documents provided (Subcatchment Master Drainage Plan (SCMDP)). No additional policy statements or action have been added to the Conceptual Scheme or taken by The County or the applicant.
- The County's response letter indicates that under the *Stormwater and Sourcewater* section that stormwater will be retained and managed within the municipal boundary. The City does not see any details around how source water quality risks to the Elbow River will be mitigated given the identified stormwater conveyance path to the Elbow River, upstream of City raw water intakes. The City would suggest that the application is deficient in having not addressed this concern.
- The Conceptual Scheme identifies that stormwater infrastructure for this development will be held in private ownership. It is unclear how The County will ensure that the system is operated and maintained as designed. The City is concerned with how a private operator will ensure that there is no adverse impact to Calgary's source water or degradation to the Elbow watershed. It is not clear who is responsible should the stormwater infrastructure fail over time, or who would be responsible for regulatory compliance.

The City has included its original water response to the August circulation below:

The Water Utility has significant concerns with the application regarding the following:

Stormwater:

- The proposed site has natural drainage to the west of the site, The City would require additional information and technical documents if the site was to be regraded and to ensure appropriate stormwater management.

Source Water:

The proposed application falls within the City of Calgary source watershed with in an area of high and very high vulnerability, as identified by *the City of Calgary Source Watershed Vulnerability Index*.

- Areas with a **High Vulnerability Rating**: Contaminants likely to be mobilized and transported downstream during most runoff-producing precipitation or snowmelt events. The time for runoff to reach the Bow River or Elbow River is short, requiring prompt action to be effective. Spills and other accidental releases would likely enter watercourses or connected aquifers if not contained within a few hours.
- Areas with a **Very High Vulnerability Rating**: Contaminants likely to be mobilized and transported downstream during most runoff-producing precipitation or snowmelt



events. The time for runoff to reach the rivers is potentially very short, making response to an event difficult. Spills and other accidental releases would likely enter watercourses or connected aquifers if not contained immediately.

The City of Calgary Intermunicipal Development Plan provides the policy structure to address lands that are considered significant for source water where section 11 focuses on watershed management with the goal to responsibly manage watersheds within the Policy Area (The City of Calgary and Rocky View County, 2012, p. 28). The IDP further includes objectives and policies to support the goal. The first objective speaks to ensuring that both municipalities manage water quality as it is important for the drinking water supply, agricultural operations and the overall health of the watershed.

Policy 11.1.1 enforces the goal and objective ensuring both municipalities protect and enhance surface water sources, watersheds and waterways (The City of Calgary and Rocky View County, 2012, p. 28).

Policy 11.1.5 states that all development proposed in proximity to water bodies should be carefully evaluated for impacts on water quality of surface water, ground water and alluvial aquifers. Negative impacts should be mitigated (The City of Calgary and Rocky View County, 2012, p. 28). This section of the IDP supports the need for stormwater management to reduce any potential impacts on water quality from runoff.

Request:

- 1) Concept Scheme policy 7.3.1- *A Staged Master Drainage Plan shall be provided at subdivision stage*. Given high and very high vulnerability rating of the lands in question, the City of Calgary Water Utility would request a copy of the report and the opportunity to review and comment against source water protection objectives, when it becomes available, particularly if the grades on the land in question will be altered.
- 2) Include language in the redesignation that the subject land is within The City of Calgary's source watershed which requires additional review by The City of Calgary at further stages of development.

Transportation:

General:

- Policy info: Page 31 identifies a 30 m cross-section for Old Banff Coach Road from the TransCanada Highway to the second easterly access to Coach Creek. There is mention in the TIA of a functional study (County, Alberta Transportation and Stantec) for Old Banff Coach Road improvements to a more urban standard. What classification of street is being proposed? The City requests that the County engage the City in this work as Old Banff Coach Road runs adjacent and would provide access to this project and adjacent City lands. Have detailed designs been carried out for proposed improvements and who would fund the improvements?
- Provide phasing information for the development and future access points to Coach Creek and Westview lands, relating to the existing Crestmont community access road, the future half interchange at 133 St SW and development within the Westview lands to the east.



- Are any transportation improvements required to service this development contained within the County's offsite levy bylaw, other funding sources or specifically identified by CMRB as regional priorities (i.e. Old Banff Coach Rd/TCH interchange improvements, Old Banff Coach Road improvements to a more urban classification, the future half interchange at 133 Street/TCH or local or regional transit provision)?
- Transportation remains concerned with potential mobility impacts to City and regional infrastructure and requests that updated traffic analysis and functional design work for Old Banff Coach Road be provided for City review.
- How will public transit be incorporated into the CS (either with extensions of Calgary Transit and or regional transit identified along the TransCanada Highway)?

TIA:

- Previous TIA comments have not been addressed.
 - Identify specific trigger points for improvements to Old Banff Coach Road, signalization of access intersections (or roundabouts), the TCH/Old Banff Coach Rd interchange and the future TCH/133 Street half interchange, similar to analysis shown in Westview OP TIA for the developer's lands to the east.
 - Figure 4.9: Provide daily volumes for Old Banff Coach Road and for mainline TransCanada Highway

Old Banff Coach Rd Network Analysis:

- Old Banff Coach Road – Regional Network Analysis memo, dated Dec 9, 2020 by Stantec was not stamped or permitted by the Professional Engineer and company. Study should be stamped and permitted and recirculated for review along with updated information in following bullet points.
- Triggers for improvements along Old Banff Coach Rd are identified for short, medium and long-range horizons but not supported by any specific traffic analysis and a specific classification of road hasn't been justified or analyzed through functional design work. Provide specific traffic analysis and design work used in developing recommendations in this memo. Further discussion between the County, City and Alberta Transportation should occur on coordinating improvements along Old Banff Coach Rd.
- Short term and medium-term horizons (figure 3.1 and 3.2) show no access points from CS to Old Banff Coach Road, (only access shown is from temporary Crestmont access road). Is the intent that the CS will not move forward in near or medium term? Access to the CS should be from identified access points in the County rather than solely from temporary Crestmont access point.
- Has the County or developer committed to funding any of the improvements identified in the study (i.e. Old Banff Coach Road, 133 St half interchange, TransCanada Highway etc.)?



- In summary, The City of Calgary **does not support** the proposed application as the application is premature and may have detrimental impact on services and resources for The City of Calgary.

If you have any further questions, do not hesitate to contact myself.

Yours truly,

A handwritten signature in blue ink, appearing to read "Matthew Atkinson", written in a cursive style.

Matthew Atkinson

Planning and Policy Strategist | Calgary Growth Strategies

Planning and Development

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