



January 20, 2021

City File: RC20-20

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

SUBJECT: Elbow View Area Structure Plan Circulation - December 2020

Dear Mr. Kazmierczak,

The City would like to thank Rocky View County Administration for circulating the draft Elbow View Area Structure Plan (the ASP). City of Calgary Administration has undertaken a review of the draft plans in consideration of Rocky View County/City of Calgary Intermunicipal Development Plan ("IDP") and the Calgary Metropolitan Region Board Interim Growth Plan ("IGP").

At this time, The City of Calgary does not support the Elbow View Area Structure Plan and the due to the potential significant transportation, servicing, and stormwater impacts that could cause detriment to The City of Calgary.

The City of Calgary requests that the ASP not be considered for approval until such time that the impacts to Calgary associated with the full build out of the plan are addressed. The City is requesting that administrative meetings to collaborate further on this work occur prior to 2nd reading and that The County and City utilize the provisions outlined within IDP section 15.3 Resolution of Intermunicipal Matters. The City anticipates that with further intermunicipal collaborations and further studies identifying impacts and cost sharing, The City's concerns can be addressed. The City of Calgary has also provided additional comments in the attachment to this letter.

Thank you for the opportunity to review and comment on the Elbow View ASP. At this time, The City does not support the proposed plan and requests further collaboration between the municipalities occur to address The City's concerns. Please feel free to contact me at the number below if you have any questions or concerns regarding this letter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew Atkinson".

Matthew Atkinson

Planning and Policy Strategist | Strategic Initiatives
Calgary Growth Strategies
The City of Calgary



ATTACHMENT: ADDITIONAL COMMENTS

Elbow View Area Structure Plan Additional Comments

Summary

The draft ASP envisions approximately 10,000 to 18,000 population within the plan area; a substantial population that will require recreational, institutional and transportation services. The cumulative effects of full build out of the ASP and its unintended consequences on Calgary's infrastructure, services and amenities has not been sufficiently explored or addressed throughout the plan and supporting technical studies. As drafted, the ASP will have detriment to the City of Calgary's infrastructure. The Interim Growth Plan outlines that impacts to regionally significant infrastructure must be identified and mitigated through the plans, the plan has not sufficiently addressed this. Also, the Interim Growth Plan outlines that municipalities must provide policies on the protection of source water quality, water conservation, storm water management and efficient use of infrastructure.

The draft plan does not align with the existing County Municipal Development Plan. The draft plan should not be considered until the Municipal Development Plan has been amended to recognize the Elbow View ASP as a growth area. The Municipal Government Act (MGA) Section 633(3) (b), outlines an area structure plan must be consistent with any municipal development plan.

Water

The City has the following general concerns related to water below:

- 1) The City would suggest the ASP is premature without having secured a water license for the development prior to approval.
- 2) The City has concerns around source water impacts due to land conversion to more intensive use. It is not clear how The County has addressed source water protection in the ASP as there is no directing policy.
- 3) The City would suggest The County complete a Cumulative Effects Assessment of residual and cumulative effects of all The County's development and land use at full build out to be included in the ASP and as an implementation action to ensure that the development will not negatively impact The City's source water quality. Particularly if the development is discharging wastewater from private wastewater treatment facility.

Servicing:

The County has proposed three sanitary system options in the circulation package. It is The City's opinion that option 2 is likely the most preferred, however, The City would await further direction from The County on how they plan to proceed.

- 4) Option 2 involves tying into an existing HAWSCo facility upstream. This is an existing system in The County which would not involve modification to the existing Master



Servicing Agreement between The County and The City. Responsibility of treatment would remain The County's through an already approved system.

- 5) The County should indicate what water licenses will be used to support the proposed densities. Without this information and the assurance that there is a water supply, we are unsure how The County could approve the ASP. It is our opinion that this is the responsibility of the municipality as the development authority.
- 6) There is the potential for wastewater to be discharged into the Elbow River upstream of The City of Calgary raw water supply. Generally, this is a concern for The City as it is increasing the risk of degraded water quality upstream of our raw water intakes. Policy should be added to the ASP to ensure consistent water quality is achieved, including how system failures would be mitigated if they were to occur.

Stormwater:

Servicing report

- 7) The report does not consider discharges from upstream areas which will need to be accommodated in the future. This is a relatively large gap that needs discussion.
- 8) Given the proposed water management concept does not achieve 45 mm per year runoff, additional LID controls such as permeable pavement, bioretention and underground storage should be considered.
- 9) LID absorbent landscaping is embedded within the 100 ha catchments. This requires the original catchment percentage impervious be re-calculated. It would be helpful for review if the report had the before and after LID impervious calculations summarized.
- 10) There appears to be a typo in section 4.3. The UARR is first stated as 1.71 l/s/ha. This changes later in the section to 1.17 l/s/ha. Please verify as the lower (incorrect) value was used to size the storm ponds.
- 11) Table B.2 – The report total irrigation demand in the first row (residential – 30% imp.) works out to 70,862 m³/year. This value may be too high and leads to a non-conservative design basis. Based on precedent of other studies.
- 12) Report should describe the hydrogeology and water table in the area to identify potentially adverse surface water / groundwater interactions eg. Inflows to storm ponds.
- 13) The report does not include a stream erosion assessment, which was recommended for this area by MPE ('16).
- 14) The report does not consider climate change but should.

Source Water and Environment:

Desktop Environmental and Historical Baseline Assessment:

- 15) While a desktop environmental assessment is a good start, the document provided falls short of addressing cumulative environmental impacts on the sensitive environment of the Elbow River and Lott Creek, particularly in the area of water quality. The City strongly recommends field verification of natural hydrology, riparian extents and buffers and water quality sampling to establish baselines. Analysis should inform mapping accompanied in the ASP. This work should be completed prior to The County considering the ASP.



- Pg 13 – The report downloads this requirement to later in the process by stating: *if development is proposed in the valley, additional hydrology, hydrogeological and biophysical work should be conducted to determine appropriate mitigation measures. Special care should be taken to reduce direct or indirect impacts to the alluvial aquifers.*
 - *Withdrawal from or outfall into the Elbow River, should include mitigation measures to protect water quantity and quality. At a minimum, they should include contingency if drought conditions require a reduction in withdrawal rate and outfall of stormwater or wastewater should meet stringent quality standards.*
 - *A detailed wetland assessment should be completed as per the AB Wetland Policy.*
 - *A detailed assessment of Lott Creek and the unnamed tributary should be completed to classify the areas of Crown-owned.... And non-Crown ownership...*
- 16) The City would suggest that the cumulative effects assessment on Pg 12 is incomplete and misleading as it states that most environmental impacts are unknown or insignificant. The City would request that a more rigorous environmental assessment is required as outlined above.

Source Water

The ASP considers lands within The City's source watershed. This area includes lands immediately adjacent to the Elbow River. Source water protection policy in the ASP and a strategy to mitigate negative source water impacts is required to ensure detriment to the City's source water (quantity and quality) does not occur. The ASP is currently silent on source water protection as a priority in the area. Policy direction could be taken from *The SSRP, Calgary Metropolitan Region Board Interim Growth Plan* or *City's Source Water Protection Plan*.

Given the size of the Plan area several of The *City of Calgary's Source Watershed Vulnerability Index* values appear. Generally, the closer lands are to rivers, streams and water bodies the more vulnerable / impactful development could be on source water.

Classifications include:

Very Low: Negligible potential for contaminants to be mobilized and transported downstream, or to enter connected aquifers.

Low: Contaminants could be mobilized and transported downstream during high precipitation events, with low potential for movement under most climatic conditions. Low likelihood of contaminants reaching connected acquirers.

Moderate: Contaminants could be mobilized and transported downstream during most runoff-producing precipitation and snowmelt events, but the time for runoff to reach a stream is long enough for mitigative measures to be implemented. Spills and other accidental releases could enter watercourses or connected aquifers if not contained.

High: 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.



Very High: Contaminants likely to be mobilized and transported downstream during most runoff-producing precipitation or snowmelt events. The time for runoff to reach the river is potentially very short, making response to an event difficult. Spills and other accidental releases would likely enter watercourses or connected acquirers if not contained immediately.

- 17) The City would suggest The County engage with City Administration on the *Source Water Protection Plan* and supporting Council Policy. The City recommends a joint meeting with TsuuT'ina, The City and The County to discuss cumulative environmental concerns with the ASP.

General Comments:

- 18) Amend all maps to include Elbow River and sub-watersheds.
- 19) Provincial / Calgary Metropolitan Region Board flood mapping should be included in the ASP with specific relevant provincial policies being mirrored.
- 20) Cumulative Effects Assessment of residual and cumulative effects of all The County's development and land use at full build out should be included in the ASP and as an implementation action; rather than defer responsibility to developers and Alberta Environment and Parks at a later state of development. The City suggests that it is The County's municipal responsibility to be accountable and monitor source water quality impacts to Calgary and other downstream users, as per the South Saskatchewan Regional Plan, Calgary Metropolitan Region Board Growth Plan, Alberta Environment and Parks and related Council Policies. The underlying goal of the cumulative effects' assessment is to maintain baseline water quality upstream of The City, not improve water quality.

Planning

- 1) The Elbow View ASP should not proceed for consideration until such time that the County Municipal Development Plan has been amended as there would be a conflict between the plans.
- 2) The City commends Rocky View County for proposing a phasing strategy within the ASP.
- 3) The Interim Growth Plan outlines that settlement areas shall be planned to 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. The Plan does not sufficiently address this and outlines that recreational services should be considered at further stages of planning. The plan must be bolstered to address this gap. If the Plan does not address this, a detrimental impact could occur on City services.
- 4) Mapping of riparian areas has occurred for contributories, however, riparian areas associated with the Elbow River have not been mapped or contained within the ASP. This should be addressed in the ASP.



- 5) On page 17, The Elbow View ASP ~~promotes the vision shared by the City of Calgary and Rocky View County for this important growth corridor while~~ contributing integral community, recreational, and commercial amenities to the broader community.
- 6) The wording of this sentence could imply Calgary's endorsement of a shared vision. As this part is redundant to the first sentence in the overall section, it could be removed without losing key information.
- 7) Throughout the document - when referring to the corporation, "the city of Calgary" should be corrected to "The City of Calgary".
- 8) Include units of measure when discussing density in the text.

Transportation

The City has concerns with potential downstream mobility impacts on City and regional infrastructure.

- 1) The Elbow View Area Structure Plan Transportation Servicing Options Study (Rev 1) by EXP Services Inc, dated November 20, 2020 is not stamped by the Professional Engineer(s) and doesn't contain Permit to Practice, as per typical practice. Authentication for the document should be provided and study resubmitted for review
- 2) The study identifies trip generating potential of approximately 62,950 additional vehicle trips per day on full buildout. These trips would predominantly use Highway 8 near the Calgary Ring Road and is in close proximity to the City's mobility network. There are large potential downstream impacts on the City that should be identified and specifically mitigated through specific commitments to fund needed infrastructure.
- 3) The Interim Growth Plan outlines that impacts to regionally significant infrastructure must be identified and mitigated through the plans, the plan has not sufficiently addressed this
- 4) Provide documentation of support from Alberta Transportation for all upgrades, improvements to Highway 8. Will the developer and or County be constructing improvements identified in the study?
- 5) Provide specific documentation and methodology for trip distribution as 19% of traffic going to/from Calgary using 22 X doesn't align with typical expectations. These trips should be assigned to/from the east on Highway 8 with minimal heading to 22 X to get back to/from Calgary.
- 6) Provide daily volume plots for all time horizons with expected daily capacities for Highway 8 as a 2-lane highway and 4 lane highway, especially to east of ASP area. Are daily post development volumes on Highway 8 within Alberta Transportation expected AADT for the 2 lane and 4 lane highway?
- 7) Provide Synchro and Sidra outputs for all three intersection(s) analysis for all time horizons for AM/PM peaks, specifically identifying all movements, LOS and vehicle delays
- 8) How will the developer and or County incorporate public transit into the development? Will the County or developer be funding transit provision or linking to private regional transit identified in the CMRB's Interim Growth Plan?

Transit

- 1) The City recommends that a Global TIA be required for this ASP that considers all modes of transportation. This TIA should estimate the impact of all proposed



development on the regional transportation network, including the network within Calgary, to accurately capture transportation impacts to the entire network.

- a. If the global TIA identifies increased congestion on major transit routes as a result of Elbow View building out, the cost of required infrastructure shall be funded by the applicant.
- 2) Calgary Transit appreciates that the proposed development is heavily conducive to transit and future regional transit connections. Transit is identified as highly possible for the area; therefore, planning for transit now ensures transit service can be implemented when required with minimal retrofitting.
 - a. Suggest adding ASP policies which reflect considerations in the Transportation Servicing Options Study for how to serve the plan area with transit. For example, the Transportation Study mentions park'n ride locations, potential transit corridors, connections to Calgary Transit's MAX service, and options for the evolution of transit service. This information should be reflected in ASP policies and on the ASP maps. More explicit transit policies lead to improved access for residents and reduce vehicle traffic.
- 3) Suggest mentioning which road types are appropriate for transit. Range roads, collector streets, and urban boulevards should be designed to be able to accommodate transit in the future.
 - a. "Local Road" policy sections should identify the transit infrastructure required on each road type.

Recreation

The ASP's Recreation and Community Plan Policies Section identifies that providing public and private space for recreation, culture, and community uses is a Plan objective. The policies, as they are written, defer recreation planning for this large area to future local plans. There is concern, however, that delaying all recreation planning to local plans will create uncertainty for regional recreation planning and delayed or uncoordinated service delivery due to the timing of local plans, which could be completed years apart.

Although Elbow View does not share a direct border with The City of Calgary, it is only a short drive to Calgary Recreation facilities, such as Ernest Manning Athletic Park (15 min drive) and Glenmore Aquatic Centre (20 min drive). For comparison, Springbank Park For All Seasons is a 17 minute drive from the same origin point (Hwy 8 and Range Rd 33). As there are no recreation facilities in the adjacent Elbow Valley ASP area, and until the County builds additional recreation facilities (e.g. aquatic centres), it is likely that Elbow View residents will travel to City facilities. Without a cost-sharing framework in place between The City and Rocky View County, the additional costs associated with more Country residents utilizing City of Calgary recreation facilities will be born by the City. Increased visitation to City facilities, that are in some cases already overburdened, will also adversely impact Calgarians ability to access recreation services and facilities.

Additionally, it is unclear how the County's draft Recreation Master Plan, Recreation Needs Assessment Study, and the Rocky View County – Calgary Regional Recreation Study have informed the ASP. None of these documents have been included in the Policy Direction section.



For example, the Recreation Needs Assessment identifies a new multi-use space facility in southwest Rocky View County as short-term priority, and the development of indoor/recreation facilities in communities that are expected to grow beyond 5,000 people as a long-term priority.

Recreation and Community Objectives:

- 1) *Support the location of recreation, culture, and community spaces and uses to support and build-upon the active town centre and core areas within Elbow View.*
 - Can it be inferred that recreation spaces and uses would be located in one or both of the Village Centres identified on Map 07: Land Use Strategy? When would recreation amenities be built based on the ASP's phasing Strategy (Map 14)?
- 2) *Provide recreation amenities for people of all ages and abilities in Elbow View, and the larger regional area.*
 - What is the larger regional area, and does it include areas within The City of Calgary?

Recreation and Community Policies

- 3) *18.1 - Local plans shall support recreation, culture, institutional, and community uses in accordance with the recommendations of applicable County standards, guidelines, and plans.*
 - Recreation uses is not listed in the County's draft MDP's Conceptual Scheme Requirements (Table 4). How will local plans support the uses listed in this policy, and will the different Elbow View local plans take a comprehensive and consistent approach to recreation service delivery?
- 4) *18.2 - Local plans shall consider the appropriate type, size, and scale of recreation, cultural, and community facilities and/or amenities.*
 - How will local plan's recreation planning be informed by the County's Recreation Master Plan and other regional recreation planning direction (e.g. CMRB recreation policy)?
- 5) *18.3 - Local plans and development shall consider and, where required, provide for the location of lands for recreation, cultural, and community uses.*
 - How will recreation planning for the ASP area be coordinated amongst the different local plans and their various phasing? What role will developers play in determining how recreation planning proceeds in local plans and what recreation facilities and amenities are ultimately provided in the local plan area?
- 6) *18.4 - The County shall support the development of recreation, cultural, and community facilities and amenities through approved funding mechanisms, and in accordance with applicable County standards, guidelines, and plans.*
 - Would these funding mechanisms include cost-sharing agreements with The City, and will this be determined through recommendations or policies within the Recreation Master Plan or elsewhere?
- 7) *18.6 - Where possible, locate recreation, cultural, and community facilities along the pathway and trail system, parks and open spaces, and/or within or in proximity to the core areas of the Plan.*



- Ideally, the pathway system in Elbow View links up to Calgary's regional pathway network through Elbow Valley (e.g. Great Trail extension) to facilitate greater active transportation opportunities between Calgary and Elbow View.