



May 12, 2021

City File: RV20-17
County File: PL20170153

Department of Planning and Development
Rocky View County
262075 Rocky View Point
Rocky View County, AB, T4A 0X2

SUBJECT: Ascension Conceptual Scheme Response #3

Dear Jessica Anderson,

The City would like to thank Rocky View County Administration for circulating the draft Ascension Conceptual Scheme and Area Structure Plan amendment. 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 Conceptual Scheme due to the potential significant transportation, servicing, and stormwater impacts that could cause detriment to The City of Calgary.

In both, our January 13, 2021 letter and our April 9, 2021 letter, The City of Calgary requested further collaborative meetings to discuss responses and resolve outstanding issues. To date, Rocky View County has not performed collaboration or coordination in regards to this conceptual scheme. 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 Ascension Conceptual Scheme. 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,

Matthew Atkinson

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

General Comments

The **Ascension Conceptual Scheme** proposes higher intensity, large-scale development along a City roadway, which requires more coordination between our municipalities to address impacts to Calgary infrastructure, services and amenities. We are concerned that these unintended impacts will cause detriment to The City of Calgary. At this time, Calgary is not able to support the proposed **Ascension Conceptual Scheme** due to a number of outstanding issues previously identified that have not been sufficiently addressed from our January 13 letter and April 9 letter. The City is again requesting further Administrative meetings to provide further context and work towards solutions. The following major topics need to be addressed:

1. Traffic impacts on Calgary's transportation infrastructure

The City of Calgary Transportation department remains concerned with the downstream traffic impacts on City infrastructure and improvements required to support the CS including; widening of 12 Mile Coulee Road, roundabout, major improvements to Crowchild Tr / 12 Mile Coulee Rd (either a continuous flow intersection or interchange). There has been no commitment or agreement from the County or developer for funding the required infrastructure and no cross-jurisdictional agreement on maintenance, operations for the proposed roundabout that overlaps the intermunicipal boundary. Interim Growth Plan (IGP) policy 3.5.1 requires that a statutory plan amendment shall: c) "provide mitigation measures and policies to address identified/potential adverse impacts on regionally significant mobility corridors."

Much more technical work is required to determine an appropriate intersection design for 12 Mile Coulee Rd/ Crowchild Tr and other related improvements. Calgary Transportation would request that the proposed Ascension CS not be approved until appropriate design and specific funding commitments are worked out with the County (and or developer) and discussed and agreed to with The City.

2. Source water protection and stormwater management issues

The City remains concerned about the lack of sufficient source water protection policy in the conceptual scheme and the lack of clarity on how stormwater will be managed that drains off-site. Calgary's Water Resources department previously noted that the lands in question have a *high* vulnerability rating under The *City of Calgary's Source Watershed Vulnerability Index*, and that the proposal creates the potential for degraded water quality crossing City lands and entering the Bow River, upstream of the Bearspaw Reservoir, and consequently, The City's raw water intake.

Our January 13 letter provides more details on the outstanding issues with the proposal and includes a number of requests:

- a) additional information is required to determine the impact of stormwater quality and quantity flowing across City lands and into the Bow River upstream of Bearspaw Reservoir,
- b) a cumulative effects assessment to determine impact and inform potential mitigation strategies to be included in the conceptual scheme.

- c) the addition of policy statement(s) committing to the protection of source water quality with specific references to the *Bearspaw Tri-Lateral Agreement* as approved by RVC Council be included in the CS.

To-date the necessary information and changes have not been provided.

3. **Cost-sharing agreements between Rocky View and Calgary**

Calgary remains concerned that this proposal has insufficient provisions to mitigate detrimental impacts to planned and existing City of Calgary infrastructure, services and facilities. The proposal of a higher intensity, large-scale development will generate increased usage of City services and facilities, and require upgrades to City infrastructure sooner. The proposal does not adequately address this and instead, for example, relies on passive recreation and is silent on transit provision. The Interim Growth Plan calls for statutory plans to provide for connections to transit, where appropriate, and to mitigate impacts on community services and facilities. 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. This needs to be addressed at the time of ASP amendment and conceptual scheme.

Calgary calls on the County to address the unintended impacts of this proposed growth. Cost-sharing agreements between our municipalities should be arranged, where appropriate. We request an amendment be made to the Bearspaw ASP to include provisions to evaluate and address the need for cost-sharing for the proposal.

4. **Inconsistency with Bearspaw ASP**

There are some inconsistencies between the Ascension proposal and the Bearspaw ASP:

- a) **Type** – The proposal of mid-density multi-residential uses, and a mixed-use commercial/retail area (Market Place) are not consistent with the *country residential* and *rural commercial* uses contemplated within the Bearspaw ASP. The proposal creates a higher intensity of use than would otherwise be expected by the ASP.
- b) **Scale/Intensity** – The large-scale commercial/retail area of 48-acres is comparable to Market Mall in Calgary, and much larger than the other rural commercial area in Bearspaw. The proposal also plans to accommodate 2,375 people - nearly doubling the population of this area of Bearspaw to approximately 5,700 in close proximity to Calgary's infrastructure, services and facilities.

Together, the type, scale and intensity of development along Calgary's boundary road is a greater intensity of impact than Calgary would otherwise anticipate from the Bearspaw ASP's future land use scenario.

Detailed Comments

Planning

The following comments have not been sufficiently addressed.

1. Increased demand on Calgary services

The proposed Conceptual Scheme will increase the demand on Calgary Transit while not contributing to its maintenance or construction. The proposal a three-minute drive to the Tuscany LRT station, and located 350 m to Calgary Transit route #74. While Transit might not currently be planned for the subject area, the City is recommending that policies be developed to support transit for the future population and workers, and that the concept be planned to be transit-ready. The Interim Growth Plan states that Employment areas should plan for connections to existing and/or planned transit, where appropriate. Given the scale and context, it would be appropriate to plan to accommodate transit in the future.

Similarly, the proposed Conceptual Scheme accommodates passive recreation but is a six-minute drive to a Calgary Recreation facility in Rocky Ridge. The proposal should include policy to support active recreation too.

2. Cost-sharing needed between the municipalities

Presently, there is a lack of cost-sharing agreements between the municipalities. Without a cost-sharing framework in place between the County and The City, additional costs associated with more Country residents utilizing Calgary facilities will be born by The City. The increased population growth in Rocky View County along the border with Calgary will adversely impact already well-used City owned facilities. We call on the County to identify mechanisms for cost-sharing in order to support the growing impact of County development.

3. Lack of alignment with Bearspaw ASP

The proposal is intended to be added as an appendix to the Bearspaw Area Structure Plan. The Bearspaw ASP contemplates *country residential* and *rural commercial*. An amendment will be needed to ensure the ASP supports the proposed mixed-use community node, varied commercial and higher density residential. In addition, policy support is needed, requiring the design be transit-ready, support active recreation and to acknowledge the need for cost-sharing. Also, as the Bearspaw ASP is under review, a holistic approach to cumulative impacts of development needs to be done.

4. Lack of Alignment to the Interim Growth Plan

The proposed conceptual scheme and area structure plan amendment do not align with the Interim Growth Plan in terms of: providing access to community services and facilities, or making 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. This needs to be addressed at the time of ASP amendment and conceptual scheme development as planning tools can be utilized to address impacts. Also, insufficient collaboration and coordination has occurred on this ASP amendment, The City has requested meetings multiple times and the responses provided have not addressed The City's issues to date.

Water

1. Lack of source water protection policy in the conceptual scheme.

The City continues to have concerns with source water protection and the discharge of stormwater upstream of Bearspaw Reservoir. The City would suggest that specific policy statements should be included in the Conceptual Scheme that commits the applicant to understanding the existing source water quality and the impact the development will have at full build out. This may include the ongoing water quality monitoring over time to ensure the development is not negatively impacting source water quality.

2. There is no reference to the Bearspaw Tri-Lateral Agreement and commitment to source water protection.

The City continues to have concerns related to source water protection. The intent of identifying the Bearspaw Trilateral Agreement is to provide the applicant with the intended direction the City expects to see from RVC when development is occurring in the area. Specific reference to the report is not necessarily but the goals, principles, and intent should be reflected as it has been approved by both Rocky View County and City Councils.

3. The conceptual scheme is unclear on how stormwater will be managed that drains off-site. Additional information is required for The City to determine the impact of stormwater quality and quantity flowing across City lands and into the Bow River upstream of Bearspaw Reservoir. The City is requesting a cumulative effects assessment to determine impact and inform potential mitigation strategies to be included in the conceptual scheme.

The City continues to be very concerned about stormwater generated by the Ascension CS Plan area and the proposal for stormwater to cross City lands (Haskayne) before emptying upstream of the Bearspaw Reservoir. The City would strongly suggest that additional dialogue is required prior to Rocky View County advancing the Conceptual Scheme for approval.

4. The City does not provide servicing to the lands in question. Servicing is being provided by piped County managed infrastructure. The City does not support the use of City infrastructure to manage stormwater runoff for the lands in question. The conceptual scheme indicates that overland flow from the site travels south through a natural drainage course, across City Haskayne lands and drains into the Bow River. The City does not support the use of City infrastructure to manage stormwater generated by the development and does not support the increase in water volume crossing the Haskayne Lands.

The City has significant concern about the potential for degraded water quality crossing City lands and entering the Bow River, upstream of the Bearspaw Reservoir. The City is requesting that a cumulative effects assessment be completed prior to Plan approval to ensure source water quality is not degraded by the development and water quantity is maintained to natural flow levels. The cumulative effects assessment of residual and cumulative effects of land use at full build out be completed prior to final adoption will ensure that the development will not negatively impact the City's source water. The underlying goal of the cumulative effects' assessment is to maintain a baseline water quality upstream of

the City while illustrating how the development at full build out will not impact water quality.

The City continues to have significant concern with the proposed use of a natural drainage course to convey stormwater and the risk of contamination and degradation to the riparian areas and riparian areas themselves. Additionally, it is unclear without a baseline water quality assessment and supporting cumulative effects assessment how RVC can ensure water quality will be maintained.

- 5. Rocky View County, as the development approval authority, has the responsibility to ensure that land use decisions do not have a negative environmental or water quality impact on neighboring municipalities source water. This responsibility is clearly defined in the South Saskatchewan Regional Plan, Calgary Metropolitan Region Growth Plan, Alberta Environment and Parks and related Council Policies. The City of Calgary's Source Watershed Vulnerability Index identifies the lands in question as having a high vulnerability, which is defined as:**

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.

Rocky View County committed to protecting water quality in the Bearspaw Reservoir for drinking water purposes. The City is requesting the addition of policy statement(s) committing to the protection of source water quality with specific references to the Bearspaw Tri-Lateral Agreement as approved by The County Council be included in the conceptual scheme.

Clarification is needed on what additional work will be completed at subdivision stage.

Transportation

The City remains concerned with the large downstream traffic impacts on regional and City infrastructure (12 Mile Coulee Rd, Crowchild Tr and Highway 1A). There is no specific funding identified by County or developer for any improvements required to support the CS including the roundabout at 12 Mile Coulee Rd/Tusslewood Dr, widening and improvements to 12 Mile Coulee Rd, either a CFI intersection (or interchange) at 12 Mile Coulee Rd/Crowchild Tr and or potential impacts to Calgary Transit. There are also proposed improvements that overlap the intermunicipal boundary (roundabout) and further discussions on coordination on construction, operation and maintenance should take place with the City ahead of the Conceptual Scheme being approved. The following comments have not been sufficiently addressed:

- 1) Any costs of improvements required to support the conceptual scheme should be at the County and or developers expense, including proposed Continuous Flow Intersection at

12 Mile Coulee Rd and Crowchild Tr, improvements to 12 Mile Coulee Road and roundabout at Tusselwood Dr/Blue Ridge Estates and or contribution to future interchange (if deemed necessary rather than the CFI intersection) and or interim signalization. No approvals within the Conceptual Scheme should occur until specific funding for all transportation improvements identified in the TIA from County or developer are provided and discussions with Alberta Transportation and City of Calgary have taken place for coordination and support for construction of identified improvements on City streets and intersections.

- 2) How does the proposed CFI transition to the future interchange and relate and interact with proposed roundabout at Tusselwood Dr? Will most of the CFI be throw-away costs when interchange is constructed? Provide conceptual design of roundabout with proposed CFI and with future interchange. Identify spacing between roundabout and interchange ramps, intersections etc. Confirm Alberta Transportation, Rocky View County and City of Calgary support for interim proposed CFI intersection, recognizing that a future interchange would be the ultimate configuration and has been identified in regional prioritization work with the CMRB.
- 3) As the proposed roundabout will overlap City/County boundary, the County should pursue discussions with the City of Calgary for coordination of construction and future operations and maintenance of this cross-jurisdictional infrastructure.
- 4) Full public vehicular access shall be provided to Bearspaw Road (and specifically identified as a road connection in Conceptual Plan) to lessen impacts of Ascension traffic on 12 Mile Coulee Road (and Tusselwood Dr and Crowchild Tr intersections). If possible, this connection should be constructed at earlier stages of overall development to lessens impacts on 12 Mile Coulee Road.
- 5) 2028 and 2039 After development analysis shows AM and PM operations for some North and South movements with the CFI operating at level of service E. Why are no operational improvements suggested to alleviate the impacts on north and south City traffic?
- 6) How will the developer and County incorporate public transit with their plan and better connect with Calgary Transit routes in Tuscany and Tuscany LRT identified in Conceptual Scheme materials?
- 7) How will active modes from the Conceptual Scheme connect with existing sidewalks and pathways within Tuscany and along 12 Mile Coulee Rd. Identify specific active modes connections and crossings for the roundabout (in previously requested conceptual design for roundabout with CFI and with interchange).