

Memorandum

To: Nose Creek Watershed Partnership
From: City of Airdrie
Date: 10/29/2007
Re: Nose Creek Water Management Plan - Comments

Below are comments from Planning, Parks, Engineering and Public Works Departments on the Draft Nose Creek Watershed Management Plan.

- 1) To go from a US EPA - Level 2 immediately to a Level 5 is ambitious. Has consideration been given to “stepping” up levels progressively and, as expertise and practical applications develop, stepping to the next level?
- 2) What is considered an actual tributary of Nose Creek or West Nose Creek? If every intermittent channel that ultimately feeds into Nose Creek or West Nose Creek was afforded a similar treatment as that proposed for Nose Creek, potentially large tracts of land would become undevelopable which, in turn, could contribute to urban sprawl.
- 3) The Implementation of the plan is open ended. It is suggested that in order to fairness and equity to be applied to the process, the date should have a minimum “must implement” date with a specific implementation plan. In general, consideration should also be given to phasing in the recommendations over a reasonable period of time (an implementation strategy).
- 4) The capital budget implications associated with retrofitting older stormwater management systems to meet the proposed standard would be prohibitive. Retrofitting existing developments to achieve level 2 standards will be difficult and expensive for parties that were not required to in the first instance. Who is ultimately responsible for the cost of retrofitting?
- 5) Recommendation (p) suggests using Municipal Reserve (MR) for the purpose of environmental protection. While every effort can be made to use Environmental Reserve (ER) for riparian areas and creek setbacks, the MGA only enables a municipality to take 10% of the net developable area (nda) for Municipal Reserve. In an urban environment like Airdrie the competing demands for reserve are increasing. As densities increase (and the population of communities does) to encourage more efficient land use practices, the need for enlarged school sites, and increased linear space and recreation space for residents increases. Adding environmental needs to this demand will place the municipality, recreation users, and schools in the position of needing to purchase land. From a fiscal perspective this creates a significant burden on the municipality and cannot be supported.

- 6) Also, while the efforts to reduce soil erosion and maintain existing vegetation are appropriate, it is suggested that there may be circumstances where the creek and its environs could be enhanced through development practices. This plan should not preclude development from modifying portions of the creek if a net benefit can be achieved. This is consistent with the philosophy adopted by Airdrie and Rocky View in their current IDP.
- 7) The variable width buffer approach will contribute to an ongoing expert vs. expert debate on what an appropriate setback is for any particular locations.
- 8) In terms of low impact development, the suggested practice of preserving existing topography is not feasible in an urban environment. In order to achieve density and usable development space in an urban environment, grading needs to be undertaken.
- 9) Recommendation (u) suggests all landowners should support low impact development efforts. In considering the plan as drafted it appears that the efforts of the partnership have focused on government agencies and limited public input to open houses. It would seem appropriate that landowners that will be directly impacted by the proposed plan be invited into the process.
- 10) The proposed minimum setback of 30m will significantly impact the viability and cost of development. In addition to the meander belt width (20 x bank full width) this will render development uneconomical in many places. While the purpose is applauded the impact should be measured in conjunction with alternative designs that could be applied to both the creek and proposed development and recognize the trade offs that may be appropriate.
- 11) At present the introduction of pathways in Environmental areas is permissible and it is suggested that given the competing demands for limited reserve and the interpretive and educational benefit of pathways in ER, in conjunction with signs and other features, this continue to be allowed. The limitations created by limiting pathways to above the 1:100 year flood line, unless the pathway is pervious, strictly limits the ability of recreation users in the City to enjoy the natural environment and benefit from healthy activities such as cycling and this cannot be supported. Additional consideration should be given to these recommendations.
- 12) Given that the City tries to utilize bridge structures to create pedestrian separations from traffic (by going under the bridge), it would be exceedingly difficult to construct all pathways above the 1:100 floodplain. Also, bridge structures are an important element of the active recreation system in the City of Airdrie and the proposed recommendations could eliminate their viability due to increased costs.
- 13) Also, in many cases the location of storm features adjacent to the creek is the most appropriate location for such features. From a topographic perspective, the lowest point in a typical setting would be adjacent to the creek. As development occurs it would seem prudent to work with natural considerations including allowing drainage to follow natural contours and collect at points that they typically would prior to release into Nose Creek.