

**Comments Submitted to the Calgary Regional Partnership  
from Water Matters**

**Re: Calgary Regional Partnership's Draft Regional Plan as  
presented in open houses in March and April 2009**

**April, 2009**

Water Matters is pleased to provide comments on the Calgary Regional Partnership's "Calgary Regional Plan". Water Matters recognizes that creating consensus among the region's partners is a difficult process. We commend the partnership for the collaborative work thus far. The feedback we present below is offered in a constructive spirit to further augment the progress already made to date.

We offer the following perspectives as an environmental non-governmental organization concerned with the health of Alberta's watersheds for current and future generations. Water Matters has a vision that watersheds in Alberta are protected for ecological and human health, recreational benefit, and their aesthetic, economic, and spiritual value. We strive to be champions of watershed protection and fair and ecologically sound water allocation through policy development, advocacy, stewarding future water leaders, and increasing the water literacy of all Albertans. We are particularly interested in the Calgary Regional Plan because its scope will affect both source waters (including upstream watersheds and groundwater) and water allocation.

### **Overall Approach**

Water Matters supports the general approach of the draft plan Calgary Regional Partnership (CRP) has shared with the public in its open houses. As we outline in more detail below, we are concerned that without changes the plan will not be able reach its goals of maintaining functioning landscapes while allowing for economic and social development.

We commend the partners of the CRP for their "thinking regionally acting locally approach." This approach signals a shift from previous municipal disputes that often started and ended with jurisdictional self-interest. We agree with the view expressed in the Draft Plan Policies that the "collective view of the entire region is more complete and integrative than the sum of their individual jurisdictions." We are also very supportive of the 60-70 year timescale the CRP has used to model its potential outcomes. We also support the broad geographic scale the CRP has looked at under its mandate. This scale encourages a holistic view of the landscape.

It is regrettable the M.D. of Bighorn has decided not to participate in the CRP. We hope the CRP will continue to reach out to Bighorn to have them return to the planning process.

### **Implementation**

Several key factors will determine the success of the implementation of CRP's plan. We discuss these factors below and make suggestions.

### **Governance**

The public would benefit from a clearer view of how CRP members will both support and hold each other accountable beyond the CRP's proposed voting

structure. A detailed the governance structure would include enforcement and mechanisms for sharing resources such as conservation or development credits. This point is elaborated further below.

While there have been frequent discussions about voting procedures, there is little in the policy document that discusses how municipalities would trade off existing benefits for desired future development or conservation outcomes. There are some allusions to broad trade-offs such as Calgary servicing water to development nodes but we strongly support the adoption of a governance model that helps to shape these choices.

### **Firm commitment to the 45,000 hectare target**

We strongly support the CRP limiting growth to 45,000 hectares as described in the open houses. To achieve this target, the limit should be adopted as a formal goal of the plan. Currently, it is desired by-product but not a binding commitment. CRP members should support each other and hold each other accountable for each member's part in achieving this goal.

One aspect of formalizing this goal to ensure a complementary governance structure details how each member contributes towards achieving the 45,000ha target. The CRP needs to takes steps to formalize how members collectively and individually will meet this goal. There should be appropriate incentives and penalties for meeting and exceeding member commitments towards this collective target. The CRP should offer clarity to its citizens about how these commitments would be enforced.

The province's Land-use Secretariat, Alberta Environment, or self-enforcement are all options that could ensure compliance in meeting this goal. Along these lines, we suggest that this sub-regional plan and the South Saskatchewan Region Plan be aligned in this respect.

### **Cumulative effects**

We commend the CRP on planning to manage through a cumulative effects approach. This approach will assist the CRP to dovetail its plan with the South Saskatchewan Regional Plan (SSRP) under the Land-use Framework. We believe that, rather than waiting for the SSRP to define indicators and threshold targets for land-use management, the CRP can lead this process with strong, assertive targets while the SSRP is developing. In the event the CRP is not able to incorporate a common set of indicators and targets, we suggest that the regional plan be updated to align closely with the SSRP.

### **Ecological infrastructure**

The area of the plan where targets require most clarity is ecological infrastructure. The elements of ecological infrastructure identified by the CRP perform crucial roles for ecological goods and services, none of which is more

important than landscape functions providing clean, abundant water.

Setting targets to maintain the ecological infrastructure elements identified by the CRP is a crucial step to supporting the target of 45,000 hectares of development. Furthermore, the wealth of scientific evidence suggests that a small footprint of developed land provides the best approach to protect the quality and quantity of water. Below we comment on these elements and targets to maintain them.

### *Wetlands*

The CRP has set the clearest target for wetlands with its statement of “no net loss.” We support this policy but urge the CRP to clearly outline it how will be achieved. Not all wetlands bring the same value. Replacing natural wetlands lost in one region with artificial storm drain wetlands in another may not achieve the same net performance. Clearer definition of how the CRP chooses to achieve this goal is critical and should be based on wetland performance and regional requirements. These requirements must include protection for ephemeral and permanent wetlands, small and large, for habitat of different aquatic species’ lifecycles, and for water filtration and regulation services.

### *Riparian buffers*

The CRP has avoided setting targets for healthy riparian areas . Riparian areas are critical because, while they only make up two percent of the total land base, they support 80 percent of the fish and wildlife species in southern Alberta in all or part of their lifecycle stages. Siting and designing new roads on non-erodible soil, on low slope areas, and away from riparian areas is one of the most critical steps to which the CRP can commit. We recommend adopting a precautionary riparian buffer throughout the entire SSRP planning region of at a minimum of 30 metres for smaller streams and 60 metres for larger rivers. However, we strongly urge that every municipality consider exceeding this minimum setback for certain uses including bank stabilization (50 metres) and wildlife habitat (100 metres).

### *Groundwater recharge zones*

Groundwater is an increasingly valuable source of water now that no new surface water licenses are available in most of southern Alberta. Avoiding development, especially impervious surfaces, on land that allows recharge of groundwater supplies is a crucial for protecting the Calgary region’s future water supply. Maintaining healthy wetlands, riparian areas, low lying areas, and upland areas with particular soils are key points for groundwater infiltration. Landscape disturbance should avoid these areas.

### *Large patches of natural vegetation*

To effectively protect watersheds and source waters within the plan area, the CRP needs to set targets for total landscape disturbed for the entire region as well as targets for total landscape disturbed on a sub-basin level.

Landscape disturbance refers to the amount of land that is cleared of vegetation for purposes of timber harvesting, mining, oil and gas exploration, roads and other linear features such as seismic lines, pavement and other impervious surfaces such as roofs, and even agriculture.

We recommend a cumulative surface disturbance of between 20 to 30 percent for sub-basins such as the Elbow River watershed. We consider agricultural cropland to be included as disturbed landscape because certain tilling practices result in increased erosion, sedimentation, and runoff rates. However, there is strong evidence to suggest that establishing thresholds for sub-watersheds provides much greater source water protection. The Elbow River watershed, a major source of drinking water for the Calgary region, may require higher levels of undeveloped land to continue to deliver high quality water.

### **Water servicing**

We support regional servicing as described by the CRP in its plans and open houses. Water servicing is often the first thing that brings development to an area. The surplus allocation of Calgary's water should clearly determine future growth—but not accelerate it.

The CRP should state more clearly how regional water servicing is exclusive to agreed-upon regional growth nodes. This clarity would include explicit statements that unplanned areas could not “tie in” to waterlines servicing development nodes.

As the CRP plan evolves, governance over water servicing must remain public and not be outsourced or converted to private interests.

### **Water quality**

The CRP should adopt objectives already identified by the Bow River Basin Council Phase 1 Watershed Management Plan and the identified specific targets for maximum contaminant loads to meet water quality objectives.

### **Conclusion**

We hope these comments assist the Calgary Regional Partnership with the Calgary Regional Plan. We welcome any questions you may have about the comments and recommendations made here.