

c/o Canada Olympic Park
88 Canada Olympic Road S.W.
Calgary, AB T3B 5R5
Phone: 403-232-6686
Fax: 403-232-6988
Email: info@cpawscalgary.org

Honourable Wayne Drysdale
Minister of Transportation
324 Legislature Building
10800 - 97 Avenue
Edmonton, AB T5K 2B6
Trans.Contact.Us.m@gov.ab.ca

March 17, 2015

Dear Minister Drysdale,

The Canadian Parks and Wilderness Society – Southern Alberta Chapter (CPAWS SAB) would like to express our concern about the Calgary Ring Road's proposed bridge crossings at the Elbow River at the Weaselhead Natural Environment Area and Clearwater Park and at Fish Creek Provincial Park.

The role of CPAWS SAB is to provide large landscape scale, science-based support and advice for the conservation and protection of Alberta's protected areas and wildlands. We aim to protect wild ecosystems in parks and wilderness, and to preserve the full diversity of habitats and species. We promote awareness and understanding of ecological principles and the inherent values of wilderness while encouraging individual action to accomplish conservation objectives.

CPAWS encourages land-use planning that promotes landscape connectivity and ecosystem function. CPAWS SAB has serious concerns that the current plan for the Calgary Ring Road crossings at the Elbow River and Fish Creek does not comply with these important principles.

Wildlife habitat and movement

Connected habitat is important for ensuring that wildlife populations continue to use natural areas and can move safely throughout the environment to find food, reproduce and migrate. The Weaselhead is perhaps the most species-rich natural area in Calgary; therefore it is especially important to ensure that the function of this area is protected through ensuring that it is connected with other natural habitats. Likewise Fish Creek Provincial Park is one of the largest urban parks in North America and connects to wildlife habitats outside of Calgary and Clearwater Park is an environmentally sensitive area and potentially the best example of a relatively undisturbed riparian floodplain in the City.

The environmental assessment (AMEC 2014) indicates that "the last remaining patches of less fragmented habitat are largely riparian in nature, occurring in association with the Elbow River and Fish Creek valleys." The area at the proposed points of crossing of the Ring Road over the Elbow River are parts of the river delta and riparian ecosystem, which relies on periodic flooding and watercourse meandering. This system provides habitat for a relatively unique array of terrestrial and aquatic plants and animals. Under the current plan, the ability of the Elbow River and Fish Creek to meander across the landscape will be restricted to defined channels. This loss of ability to meander will alter the ecosystem and the habitat available to support the high level of biodiversity in the natural areas.

The proposed crossing plans indicate that there will be ~15m on either side of the channel under the Elbow River bridge and ~7.5m on either side of the channel under the Fish Creek Bridge (see attached figures). It is CPAWS SAB's view that the cut-and-fill design and short bridges, even with the mitigation measures recommended in the environmental assessment, will not conserve the habitat in the Weaselhead and Fish Creek and will not provide sufficient area for wildlife to securely cross under these bridges during daily or seasonal movements. CPAWS SAB recommends that to conserve biodiversity and ensure wildlife movement is not impeded as result of construction of the Ring Road that the river is left to its natural channel and open span bridges are constructed across the Elbow River and Fish Creek.

Water quality and flood mitigation

Natural areas provide important ecosystem services such as water quality filtering and flood mitigation. The meandering system of the Elbow River contributes to filtering and cleaning of Calgary's water before it reaches the Glenmore Reservoir. Realigning and restructuring the river at the Weaselhead and Clearwater Park crossing could result in increased sediment in the Elbow River, potentially increasing the costs of treating our drinking water. Potential decreases in water quality could also affect fish populations in the watercourses.

Natural watercourses and riparian areas in Calgary also help mitigate flood risks. Channeling the Elbow River and Fish Creek at these crossings may actually increase the risk of future erosion and floods by impacting natural functions. The recent Room for the River report, providing advice to the Government of Alberta, recommended that to mitigate flooding risk the province should "evaluate what changes can be made under the current agreement to widen the spans of the SWCRR Elbow River Bridge and the Fish Creek Bridge, and ensure that triple bottom line accounting is incorporated in any plan revisions" (Alberta Watersmart 2014). CPAWS SAB supports this recommendation.

Alignment with Municipal and Regional Plans

CPAWS SAB believes that the current bridge plans are contrary to regional and municipal plans and policies, for example:

- The *South Saskatchewan Regional Plan* states that appropriate flood management "includes improved development practices and use of flood management tools and infrastructure and by making better land-use decisions in headwater landscapes and flood hazard zones."
- The Government of Alberta report *Stepping Back from the Water: A Beneficial Management Practices Guide for New Development Near Water Bodies in Alberta's Settled Region* indicates that the most effective way to reduce flood risk (and costs) is to locate developments outside of the floodplain, or design structures in a way that allows for flooding and lateral channel migration to occur with minimal damage to property.
- *Calgary Metropolitan Plan* commits that "Member municipalities will work together to maintain and enhance landscape connectivity across the region to ensure the health and integrity of the ecological system" and that "Member municipalities will protect the ecological function of riparian lands within their jurisdiction and will recognize site-specific needs."

- The City of Calgary *Municipal Development Plan* includes specific guidelines to prioritize conservation of riparian areas in infrastructure and transportation planning (Section 2.6).
- The *Calgary Transportation Plan* indicates that “Bridge length should be established to allow proper conveyance of the probable maximum flood flow. The length of the bridge should be increased to eliminate the potential for scour of the abutments and piers, to provide access under the crossing for pedestrian paths, and to preserve wildlife migration corridors and riparian vegetation”
- The City of Calgary *Riparian Strategy* includes the goal that “Riparian areas and connectivity are sustained or restored”

CPAWS SAB believes that the Government of Alberta should respect these plans and policies in transportation plans, such as the ring road, that affect the City of Calgary.

The Weaselhead Natural Area, Clearwater Park and Fish Creek Provincial Park are special areas of urban nature that contribute to the city’s biodiversity and provide valuable ecosystem functions such as clean water and natural flood mitigation. These natural areas also provide quiet places for Calgaryans to experience wildlife and nature in an urban setting.

Calgary and our natural areas are part of the bigger landscape. Transportation planning decisions cannot be made without considering the role our park and natural areas play in connecting wildlife, watershed function and conserving landscapes on a larger scale. Transportation planning needs to include these values and construct a ring road that provides a safe and effective way to move people, goods, and services but does not put important riparian values at risk. CPAWS SAB believes that leaving the natural river course at the three crossings and constructing open-span bridges across Fish Creek and the Elbow River valleys are the most appropriate measures for the Calgary Ring Road.

We look forward to discussing our concerns with you.

Sincerely,



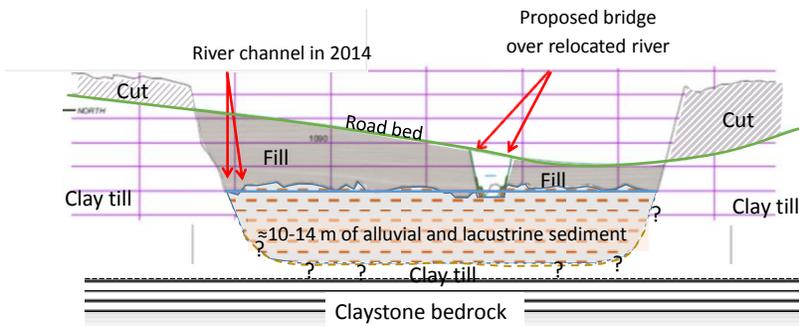
Katie Morrison
Conservation Director
Canadian Parks and Wilderness Society – Southern Alberta Chapter

Cc:

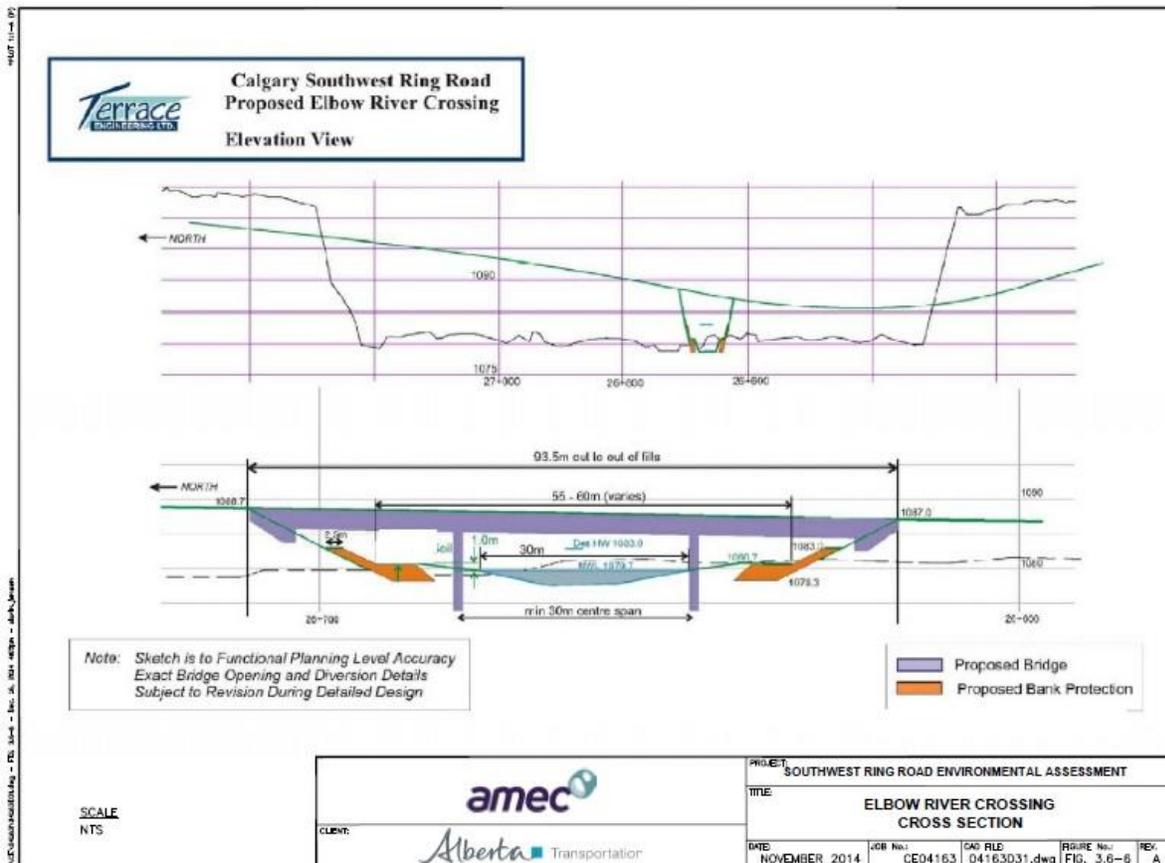
Mr. Andre Corbould, Deputy Minister of Transportation Andre.Corbould@gov.ab.ca
Minister Kyle Fawcett, Minister of Environment and Sustainable Resource Development, ESRD.minister@gov.ab.ca
Chris Menderson, Urban Conservation Lead, City of Calgary Chris.Manderson@calgary.ca

Elbow River Valley Crossing

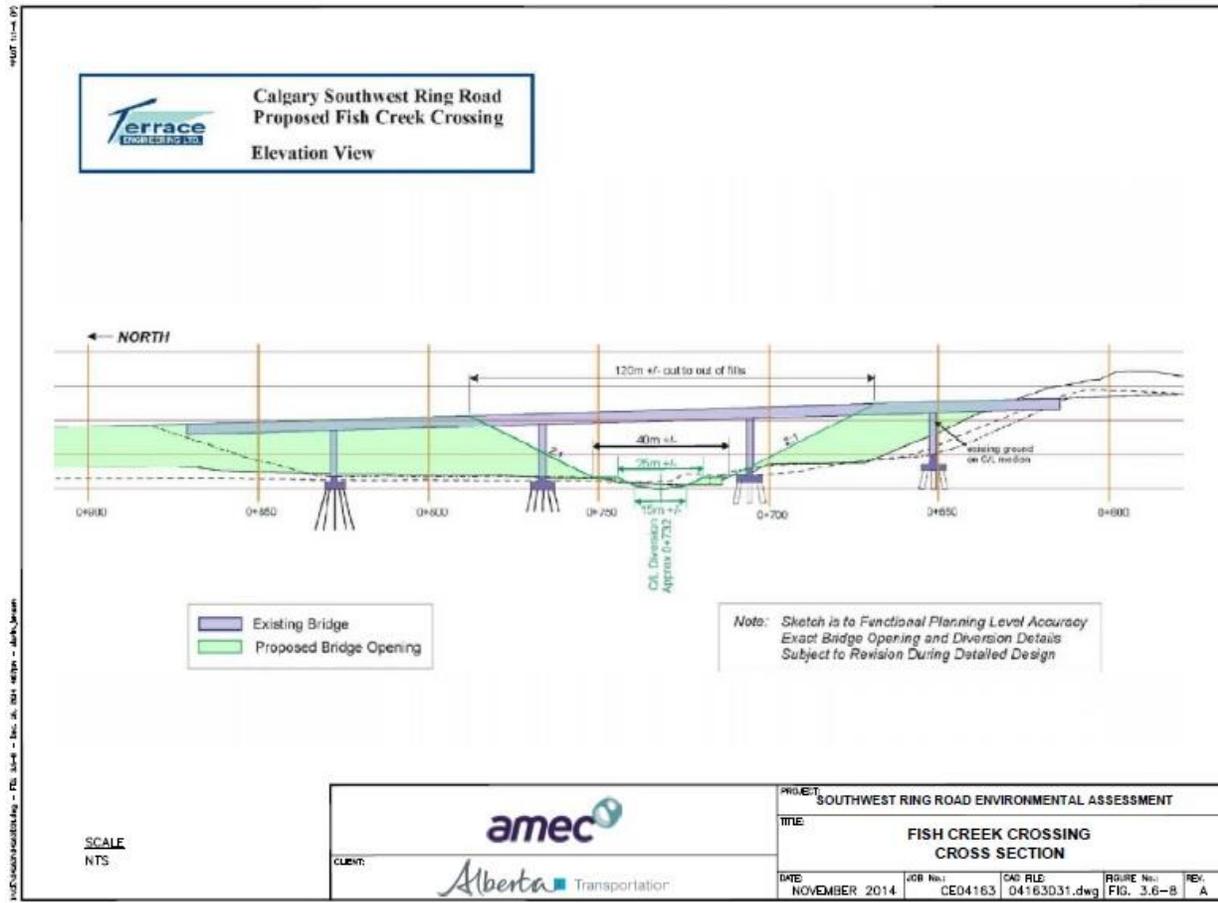
SW Calgary Ring Road



Source: Glenmore Weaselhead Preservation Society



Source: AMEC Environment and Infrastructure. 2014. Environmental Assessment for the Southwest Calgary Ring Road (Updated December 2014). Volume 1 of 2. Submitted to Alberta Transportation, Edmonton, AB.



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