

The North Saskatchewan River Valley and Ravine System and Development Below Top-of-Bank on Terrace Lands

Recommendation:

That the December 7, 2015, Sustainable Development report CR_2803, be received for information.

Report Summary

This report explains Edmonton's policy framework for the River Valley and Ravine System, which affects development within and immediately abutting this system. It also explains concerns from the development industry relative to the securing of lands within and abutting the river valley and ravines and outlines the basis of their concerns as well as the City's position on this matter.

Previous Council/Committee Action

At the November 2, 2015, Agenda Review Committee meeting, the Sustainable Development report CR_2803 was postponed to the December 7, 2015, Special Executive Committee meeting.

Report

The North Saskatchewan River Valley and associated Ravine System is widely considered by Edmonton area residents and visitors to be the city's most significant physical asset. As such it provides a range of recreational and social opportunities, and is a critical element regarding ecological outcomes.

For over 100 years City and provincial authorities have sought to preserve/conservate the North Saskatchewan River Valley to provide a park and natural system appropriate to a metropolitan area, and to protect urban development from natural hazards. In 1907, Edmonton City Council sought guidance on a park system for the city from Montreal landscape architect, Fredrick C. Todd. In part response, Todd recommended the river valley and ravine system be retained for open space purposes, and that a continuous "scenic drive" be developed along the top-of-bank for the river. In 1915, the year of Edmonton's great flood, the Provincial Government adopted Todd's recommendation to preserve the river valley for natural purposes - partly to provide a key element in an open space system for Edmontonians, and partly to preclude urban development in flood prone areas along the river. That same year the City incorporated the river valley park concept into its City Plan.

In the time since accepting Todd's advice Edmonton has progressively adopted and applied a number of policies, plans and bylaws to support the City's environmental

protection and open space goals for the River Valley and Ravine System (see Attachment 1). Also in this time Administration has developed a number of procedures, processes and protocols to implement these planning instruments, which have become embedded into a framework of practice in planning for, and acquiring lands within and along, the river valley and ravine system. Key objectives in this approach are to:

- restrict intensive urban development to the three river valley communities of Rosedale, Cloverdale and Riverdale
- review, prevent and/or mitigate impacts of public and private development within and adjacent the valley and ravine system
- acquire lands within the river valley and ravine system to best facilitate control over land use and programming.

In recent planning applications, the development industry has challenged the City's application of the *Municipal Government Act* and the taking of terrace lands within ravines as environmental reserve at the time of subdivision. Industry argues that these lands do not meet the definition of Environmental Reserve under the *Municipal Government Act* and are developable. Therefore these lands should not be subject to dedication as environmental reserve and should be acquired, either by purchase or by trade, at full market value based on highest and best urban use.

Terrace lands can be relatively flat. These areas may have been formed as part of a former flood plain or in some cases they were naturally created as "slumps" or landslides in the abutting river valley/ravine escarpment. Terraces may be wholly contained within a ravine or river valley and therefore may abut slopes that separate them from the table lands above the top-of-bank and other sloped lands that separate them from water courses or ravine bottoms. Some terraces are difficult to physically access and others are less so and in fact have been disturbed by past human activity (e.g., cultivated for agriculture, resource extraction). Attachment 2 depicts the formation of terraces and landslides.

The City's Policy and Implementation Framework – River Valley and Ravine Lands

The City's Policy Framework for River Valley and Ravine Lands is based on a municipality's authority to regulate land use under the *Municipal Government Act*. This includes the extent to which lands may be developed (i.e, development intensity). The use and intensity of use for land is guided by a number of statutory and non-statutory policy and regulatory instruments including the City's Municipal Development Plan (*The Way We Grow*), Council Policies, Area and Neighbourhood Structure Plans, Area Redevelopment Plans, and the Zoning Bylaw. Together these instruments affect the market value of lands across the city, including those in the river valley and ravine system, which are designated as open space and natural area and subject to acquisition as environmental reserve at the time of subdivision.

Municipal Government Act

Section 664 of the *Municipal Government Act* empowers municipalities to acquire environmental reserve lands, at the time of subdivision without compensation to the owner. The Act defines these lands as:

- a swamp, gully, ravine, coulee or natural drainage course;
- land that is subject to flooding or is, in the opinion of the subdivision authority, unstable; or
- a strip of land, not less than six metres in width, abutting the bed and shore of any lake, river, stream or other body of water for the purpose of
 - preventing pollution, or
 - providing public access to and beside the bed and shore.

Should the Subdivision Authority deem lands to meet one or more of these criteria, then the owner will be required to dedicate (without compensation) these lands to the City at the time of subdivision. For example, where a parent parcel being subdivided straddles table lands and a ravine, the lands in the ravine will be deemed environmental reserve and dedicated as a condition of subdivision to the City as a separately titled parcel. Disagreements between owners and the Subdivision Authority on the extent of environmental reserve acquired by the City may be resolved through an appeal process involving the Subdivision and Development Appeal Board and the courts.

Unlike the provisions for Municipal Reserve, the *Act* currently does not allow a municipality to defer the taking of environmental reserve – therefore it must be delineated and taken with the first subdivision. If it is not taken with the first subdivision, then a municipality may not be able to claim it in the future.

The Way We Grow, Municipal Development Plan – Bylaw 15100

The Municipal Development Plan guides the use and acquisition of lands within the river valley and ravine system through the following policies:

- 7.1.1.6, Act proactively to acquire ecologically sensitive and environmentally valuable land in the North Saskatchewan River Valley where necessary.
- 7.1.1.10 Utilize the full legislative entitlements of environmental reserve, in accordance with the *Municipal Government Act*, during the land development process.
- 7.3.2.1 Ensure that the North Saskatchewan River Valley and Ravine System remains primarily an area of unstructured, low intensity and passive recreation, while accommodating appropriate balance of recreation activity within park nodes as described in the Urban Parks Master Plan and the Ribbon of Green.
- 7.3.2.3 Ensure that the lands within the North Saskatchewan River Valley and Ravine System Area Redevelopment Plan boundary will be acquired for parks purposes and natural area protection.

- 7.3.3.2 Maintain adequate separation between new urban developments and the North Saskatchewan River Valley and Ravine System through the City's Top of Bank Policy, with viewsapes and public access, to the river valley preserved.

Together these policies guide the City's actions to actively pursue acquisition of environmentally sensitive land in the river valley, acquire these lands through environmental reserve dedication where possible, ensure these lands will be of low intensity use inclusive of parks and natural area protection, and ensure a separation is maintained between new urban development and the river valley and ravine system.

North Saskatchewan River Valley Area Redevelopment Plan - Bylaw 7188

The purpose of Bylaw 7188 is to protect the river valley and ravine system as part of Edmonton's open space heritage, and to manage public and private development such that it enhances and does not negatively impact the river valley and ravine system as an open space area. Bylaw 7188 applies to the river valley and its tributary ravines, much of which does include terraces of varying sizes and configurations. At the time the boundary of the Plan was applied, it was done so through photogrammetric methods. As the development process is applied to the lands along the top-of-bank, the Plan boundary is ground-truthed and adjusted as per Council Policy C542 (see below).

Key policies of Bylaw 7188 relevant to the above discussion are:

- 3.2.1 Natural Conservation Area – It is a policy of this Plan that those areas which have significant vegetation, potential wildlife and waterfowl habitat, or other unique natural physical features shall be managed as nature conservation areas and may be used for outdoor educational, interpretation or low intensity recreational activities.
- 3.2.7 Environmental Reserve Dedication – It is a policy of the Plan that the City may acquire through subdivision all lands lying below the geomorphic limit of the River Valley and Ravine System as environmental reserve, in accordance with the provisions of the *Planning Act*. At the discretion of the Subdivision Officer or the Municipal Planning Commission, the geographic top-of-the-bank may replace the geomorphic limit in this policy.
- 3.2.8 Use of Environmental Reserve – It is a policy of this Plan that all lands acquired by the City through the subdivision process as environmental reserve shall be managed as parks and open spaces.
- 3.3.4 Development on Environmentally Sensitive Lands – It is a policy of this Plan that when a development application is received, the Development Officer shall determine if the subject lands are environmentally sensitive to development, and may require additional information be provided. In determining whether a permit shall be issued and what conditions, if any, are required to eliminate or mitigate environmental damage, the Development Officer may consult with other civic departments and environmental agencies.

- 3.7.2 Prohibit Additional Residential Development - It is a policy of this Plan that additional residential lots will not be created, except in the Central Area (Rossdale, Cloverdale, Riverdale).

The above policies generally align with the direction of the Municipal Development Plan, including the understanding that the future prominent use of the river valley and ravine system (outside the three central valley communities) is that of its current natural state with some low intensity recreational opportunities.

Administration implements Policy 3.7.2 by refusing the subdivision of properties wholly contained in the river valley and ravine system that have the intent of creating additional lots from existing (legacy) lots wholly contained in the river valley and ravine system.

Policy C542 - Development Setbacks From River Valley/Ravine Crests

Approved in 2010 and superseding a previous Top-of-Bank Public Roadway Policy adopted in 1970, Policy C542 is intended to protect the river and ravine system while guiding development within and adjacent to the river valley and ravine system such that it too is protected. The purpose of the policy is to:

1. Ensure urban development is reasonably safe from environmental hazards, such as slope instability and failure, flooding or fire that may result in loss to persons and property.
2. Protect the River Valley and Ravine System from urban development that may compromise its integrity and long-term stability.
3. Maximize access for local residents and the general public to a continuous circulation system along the entire length of the Upland Area Abutting the River Valley and Ravine System. Public access is provided for circulation and amenity purposes, connection to the park system with the River Valley and Ravine System, slope repair and geo-technical monitoring, firefighting, emergency and public safety, drainage control, and for dealing with encroachment issues.
4. Ensure preservation of the River Valley and Ravine System as a significant visual and natural amenity feature, contributor to the ecological functionality of the City's natural areas system, and recreational opportunity for the citizen of Edmonton.

Policy C542 contains several figures to illustrate and define a number of concepts and terms (see Attachment 3). Together these figures provide the City's interpretation of the *Municipal Government Act* by identifying Environmental Reserve as being those lands within the river valley and ravine system. Specifically, Environmental Reserve is identified as including a public upland area, crest, bank/slope, terraces, and river or creek; and, being separated from developable table lands by an Urban Development Line.

While the Urban Development Line delineates Environmental Reserve, it is the top-of-bank line that is the basis upon which the area of application (boundary) for Bylaw 7188

is adjusted. In some cases the Urban Development Line is located through geo-technical studies that estimate the line of long term stability along the edge of a ravine by separating stable from unstable lands based on factors of safety. In other situations the Urban Development Line will be located via a minimum setback distance (10 metres) from the top-of-bank line or crest of the ravine after geo-technical studies confirm the risk of instability is low. In addition to delineating the “Urban Development Line/Long Term Line of Stability” geo-technical studies will also inform subdivision and development conditions to maintain slope stability (e.g., restrictions on irrigations systems on abutting private properties).

Policy C542 does provide that the City will work with property owners and developers of lands adjacent and within the river valley and ravine system to acquire these lands through other means when they are not subject to environmental reserve dedication. Administration interprets this direction to mean that it will pursue acquisition of those properties wholly contained within the river valley and ravine system and where the City does not expect the owner will seek subdivision that would trigger environmental reserve dedication.

Zoning Bylaw 12800

The Zoning Bylaw identifies use opportunities and the development parameters of those opportunities for all land in the city. All private land in the city is zoned to allow a development opportunity that enables the owner to either reside or conduct an activity on the property.

With the exception of several major utility facilities (e.g., water treatment plants), major activity/recreation nodes, (e.g., Fort Edmonton Park), and several legacy estate residential and industrial development lands, the majority of land in the river valley and ravine system is zoned either A (Metropolitan Recreation), or AG (Agricultural) (see Attachment 4 for an overview of applicable policy and zoning provisions).

The stated General Purpose of the A (Metropolitan Recreation) Zone is to:

“preserve natural areas and parkland along the river, creeks, ravines and other designated areas for active and passive recreational uses and environmental protection in conformance with the Municipal Development Plan and the North Saskatchewan River Valley Area Redevelopment Plan.”

Given this purpose, most A (Metropolitan Recreation) zoned lands are owned by the City, and many of the A (Metropolitan Recreation) Zone use opportunities are aligned with publicly oriented/operated activities (e.g., public park, cultural exhibits, protective and emergency services). The remainder of the A (Metropolitan Recreation) Zone use opportunities enable private owners to either reside (e.g., single detached dwelling) or conduct activities (e.g., farms, greenhouses, signs) on their property (to the extent they can obtain servicing, etc.). The A (Metropolitan Recreation) Zone predominates in those areas of the river valley and ravine system where the abutting top of bank areas have been developed for urban purposes reflecting the fact that these lands are re-zoned

(from Agriculture) and subdivided as part of the development process, inclusive of their acquisition by the City largely through environmental reserve dedication.

The General Purpose of the AG (Agricultural) Zone is to “conserve agricultural and rural land use activities.” As such the Zone contains a limited number of use opportunities to accommodate agricultural (e.g., farms, farm dwellings) and compatible related uses. The majority of the lands zoned AG (Agricultural) in the river valley and ravine system are privately owned and located abutting pre-development/developing table lands areas. As the development process is applied to the adjacent table lands, the river valley and ravine lands may be rezoned A (Metropolitan Recreation) in anticipation of their acquisition by the City through environmental reserve dedication under the subdivision process.

Private Development in the River Valley and Ravine System

Based on the above policy framework, all privately owned land within the river valley and ravine system may be developed with a maximum of one dwelling per titled lot. However, developing these properties must be to City standards and raises a number of potential issues including:

- obtaining planning approvals:
 - a single detached dwelling is a discretionary use opportunity under the AG Zone
 - development in the river valley and ravine system may require City acceptance of various studies on mitigating hazards (e.g., instability, flooding, wildfires) and addressing potential impacts on the ecological function of the river valley and ravine system
- obtaining legal access through another owner’s land, or the City’s land (i.e., environmental reserve lands)
- providing physical public / private vehicle access across slopes of variable steepness may require special engineering with additional costs
- providing utilities inclusive of potential drainage/sanitary pump/lift stations with significant capital, operating and maintenance costs;
- meeting potential emergency access requirements
- mitigating the impacts of climatic changes including risk of future wildfires and flooding.

Policy Framework Implementation

As noted above, acquisition of private land in the river valley and ravine system is fundamental to implementing the City’s policy framework. To acquire lands within the river valley and ravine system Administration will have the owner dedicate them as environmental reserve through the subdivision process, purchase them, or seek their donation as an eco-gift. These approaches are undertaken concurrently, but within two different contexts.

Eco-gifts and opportunity purchase are pursued where the properties are wholly contained within the river valley and ravine system and where the owner is not expected to subdivide and thereby trigger the potential for environmental reserve dedication. Offers to purchase are often based on the City's policy framework with the highest and best use being natural area and open space. Not surprisingly, some owners are not willing to accept such offers. Administration will be more aggressive in its offers where the risk of incompatible development is high, or the property is required for an imminent municipal need. Overall Administration will be conservative in the "rate" it offers for these lands and will be patient in concluding a purchase based on the understanding that the development opportunities of private owners are legally and physically constrained and that the City is among very few interested buyers. Even though the City's policy framework "designates" all lands in the river valley and ravine system for future open space uses, it is not compelled to acquire these properties on the basis that the affected private owners have some development rights under the Zoning Bylaw.

The acquisition of river valley and ravine lands through environmental reserve dedication occurs through the land development approvals process and begins at the Area Structure Plan stage when the boundary of the plan must be established. Establishing the plan boundary adjacent to the river valley and ravine system informs eventual adjustments to the boundary of the *North Saskatchewan River Valley Area Redevelopment Plan*. Ideally this step will ensure the boundaries of the two Plans are generally co-terminus (i.e., do not overlap) and thereby avoid conflicting policy direction between the Plans based on different goals and objectives. The two Plan boundaries will then be further reconciled at the Neighbourhood Structure Plan stage by identifying the Urban Development Line and the top-of-bank line. This in turn guides the future placement of zoning and subdivision lines demarcating developable private and public lands and lands subject to environmental reserve dedication. The above leads Administration to expect that all land within the boundary of the *North Saskatchewan River Valley Area Redevelopment Plan* (i.e., on the valley/ravine side of the Urban Development Line) will be dedicated as environmental reserve.

Municipal Government Act Interpretation

Industry Position

Recently, a number of land developers have challenged the above implementation model. Specifically, these owners interpret the *Municipal Government Act* such that it does not empower municipalities to acquire "developable terrace lands" within ravines as environmental reserve when those same lands can be proven to be geo-technically stable and not subject to 1:100 year flooding. This interpretation supports the following position:

- some terrace lands do not meet the definition of environmental reserve and may be developed for use opportunities identified under the Zoning Bylaw
- if the City wants these lands for parks and natural purposes, then the City must compensate owners at a monetary level reflecting the highest and best use of the terrace (i.e., estate residential) as provided for under the Zoning Bylaw

- the City may acquire these lands through purchase, trade or accept them as Municipal Reserve lands
- the City must either acquire these lands at the time the parent parcel is subdivided, or enter to an agreement with the owner(s) for their future acquisition.

The above also comes with the owner expectation that the City will not attempt to acquire these terraces as environmental reserve at subdivision stage and will permit owners to create a terrace as a single parcel suitable for estate residential development, or for trade/sale to the City for open space (with compensation).

Should the City not agree to these terms, then these owners indicate that they are prepared to seek a resolution through the Courts.

City Approach

Industry's interpretation of the *Municipal Government Act* is viewed as being too narrowly focused on the "hazard element" of the environmental reserve definition to the exclusion of other circumstances and situations identified under Section 664. The Act defines environmental reserve as needing to meet one, not necessarily all, of a number of conditions. In this case, while a terrace may be proven to be stable and not subject to flooding, it still meets the test of environmental reserve by being in a "ravine".

Both the development industry and the City have requested that Environmental Reserve be more clearly defined through the current review of the *Municipal Government Act*. The City is seeking clarification that Environmental Reserve includes not only "hazard lands", but also "natural areas" to recognize their ecological service value and benefit to urban populations. Industry is firmly opposed to expanding the criteria for environmental reserve.

Should industry be successful in obtaining a favourable interpretation/decision by the courts, or favourable changes to the *Municipal Government Act*, Administration observes that:

- the "developability" of terraces must be conclusive and consider the feasibility of their development relative to access, utility servicing, and ecological impacts on the abutting natural areas
- the rate of compensation for a terrace should reflect:
 - the City's policy framework for the river valley and ravine system, which generally identifies lands within ravines as being most appropriate as natural and open space
 - the cost to develop these lands for urban purposes
- estimating the legal and physical costs to develop a terrace should be the responsibility of the owner and the findings of this work should be appropriately evidenced and acceptable to the City

- private to private purchases of properties that straddle the top-of-bank typically include some discounting based on the legal and physical limitations assigned to those portions of the property in the river valley / ravine
- purchasing, trading or accepting terraces as credit Municipal Reserve lands at the time of subdivision, or at a later date, will negatively impact the City's ability to meet natural and open space needs on the abutting table lands and in other areas of the river valley and ravine system
- the difference in compensation rates based on estate residential versus natural area / open space is substantial (i.e., millions, or hundreds of thousands versus tens of thousands of dollars)
- purchasing terraces from land developers as part of the development approvals process at estate residential rates will drive higher asking prices for other privately owned lands within the river valley and ravine system
- approximately 38 percent of the river valley and ravine system is privately owned (see Attachment 5) – future annexations will significantly add to the amount of privately owned lands within ravines.

Administration would make these same observations to the Province as feedback to any potential unfavorable amendments to the definition of Environmental Reserve.

Key Questions

1. Can terraces scientifically proven to be stable and above the 1:100 flood line be developed?

Yes. A significant amount of land (including steep slopes) within a ravine or river valley can be physically developed with proper engineering. However, two general considerations should factor into building within a ravine:

- the cost to develop these lands (either sloped or relatively flat) inclusive of providing supporting studies, obtaining planning approvals, constructing road access and providing utility servicing may make their development impractical or unfeasible
- the cost to mitigate the impact to the environment and habitat inclusive of the long term risk to persons and property.

2. Can the City's policy framework and zoning regulations restrict development within the river valley and ravine system?

Yes. Municipalities have the authority, as part of their long range planning, to regulate development on private property based on the Plan designation so long as existing zoning for the affected land permits some private use of the land.

3. How is "highest and best use" defined?

The Appraisal Institute of Canada defines the term highest and best use as: "The reasonably probable and legal use of vacant land or improved property, which is

physically possible, appropriately supported, financially feasible, and that results in the highest value as at the effective date of appraisal.”

4. Does the City’s policy framework affect offers (rate of compensation) to acquire private lands (not likely to be subdivided) within the river valley and ravine system?

Yes. Administration will offer a rate based on the plan designation being parks, natural area and open space and the zoning being A (Metropolitan Recreation), or AG (Agricultural).

5. Does the City’s policy framework compel the City to acquire river valley and ravine lands at any time?

No. The City is not compelled to purchase private property in the river valley and ravine system so long as the private owner has some realistic opportunity to use the affected land under the Zoning Bylaw. Administration will monitor the availability of land for purchase and/or propose purchase for private lands to meet an imminent municipal need (e.g., to accommodate a trail alignment/connection as per an approved Plan).

6. How is a ravine defined, what lands are included in a ravine and what lands are excluded from ravine?

Webster’s New World College Dictionary (2010) identifies a ravine as “*a long, deep hollow in the earth’s surface, especially one worn by the action of a stream; large gully or small gorge*”.

Ravines are landforms created by running water that has eroded into soil. Ravines are typically larger in scale than gullies and smaller in scale than valleys. Together gullies, ravines and valleys may form a hierarchy where water from table lands flows in a gully (sometimes being dry), then flow into a ravine (sometimes being dry), and then flow into a watercourse within a valley. A characteristic of all of these landforms is that they will have side slopes of variable steepness, with variable potential for movement, and in the case of ravines and valleys will include terraces.

To guide interpretation of the *Municipal Government Act*, Edmonton’s policy framework identifies all lands on the ravine/valley side of an Urban Development Line as being environmental reserve. Administration will negotiate the location of the Urban Development Line depending on the topography of the interface between table lands and a ravine/valley.

7. When can Industry challenge the City on the taking of terraces within ravines as environmental reserve?

Typically, industry would challenge the City at the time of subdivision when the City seeks to acquire environmental reserve. It could first do so at the Subdivision and Development Appeal Board and then through the courts.

8. What is the status of the Municipal Government Act review?

On September 25, 2015, the Government of Alberta announced its intention to update the *Municipal Government Act* before the end of 2016 and made the following statement: "*The updated Municipal Government Act will address outstanding issues and aim to achieve the following for Alberta municipalities... further responsibility for land use and environmental conservation*". Despite this statement, in the past the Province has been reluctant to make any change to the Act where municipalities and industry did not agree on a change.

Next Steps

A number of proposed Neighbourhood Structure Plans are waiting to be advanced pending resolution of this issue. Industry is seeking assurance that the City will compensate valley/ravine terraces owners at an "estate residential" rate and in a timely manner. Industry would like this agreement on compensation to be ideally identified in the Plan document at the time of its adoption.

An industry challenge of a City Council approved Neighbourhood Structure Plan without such assurance would likely occur with the taking of environmental reserve at the time of subdivision. Depending on the proposed staging of the Plan area and the application of compliant land use zoning, subdivision is not expected to be imminent. The time between the approval of a Neighbourhood Structure Plan and a decision on a subdivision within the Plan area may be from six months to several years. However, there may be other affected subdivision applications that could challenge the City over the next several months.

Until the Province updates changes to the *Municipal Government Act*, the City practice of taking all land within a ravine as environmental reserve at the time of subdivision will continue. Relative to forthcoming Neighbourhood Structure Plans this would mean approving the Plan without including the assurance industry is seeking on the future disposition of terraces. Should the Province amend the Act in favour of industry, then the City will be compelled to amend its policy framework accordingly.

Policy

The Way We Grow, Edmonton's Municipal Development Plan

The Way We Green, Edmonton's Environmental Strategic Plan

North Saskatchewan River Valley Area Redevelopment Plan (Bylaw 7188)

City Policy C542 – Development Setbacks From River Valley/Ravine Crests

City Policy C531 – Natural Area Systems

Natural Connections Strategic Plan (2007)

Urban Parks Master Plan (2006)

Ribbon of Green Master Plan (1992)

Attachments

1. Overview of Plans, By-laws and Policy Initiatives to Protect the North Saskatchewan River Valley and Ravine System
2. Graphic Depiction of Terrace Land Development and Landslides
3. Urban Development Line and Long Term Line of Stability – Development Setbacks From River Valley/Ravine Crests Policy C542 and Other Applicable Figures
4. Applicable Policy from the Municipal Government Act, the North Saskatchewan River Valley Area Redevelopment Plan, and the Edmonton Zoning Bylaw
5. Public and Private Ownership Within the North Saskatchewan River Valley Area Redevelopment Plan

Others Reviewing this Report

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