



SPECIAL COUNCIL MEETING AGENDA

Date: Tuesday, March 2, 2021
Time: 9:00 AM
Location: <https://www.rockyview.ca/>

Pages

- A. CALL MEETING TO ORDER
- B. UPDATES/APPROVAL OF AGENDA
- C. APPROVAL OF MINUTES
- D. FINANCIAL REPORTS
- E. PUBLIC HEARINGS / APPOINTMENTS

The following public hearing was advertised on February 2, 2021 and February 9, 2021 on the Rocky View County website in accordance with the *Municipal Government Act* and *Public Notification Bylaw C-7860-2019*.

MORNING PUBLIC HEARINGS / APPOINTMENTS 9:00 AM

- 1. **Division 9 - Bylaw C-8051-2020 - Redesignation Item – Industrial Redesignation** 3
File: PL20200031 (06731002/4)

F. GENERAL BUSINESS

- 1. **Division 9 - Master Site Development Plan – Summit Pit** 328
File: PL20200034 (06731002/4)

G. BYLAWS

- 1. **All Divisions - Adoption of Proposed Bylaw C-8090-2020 (New Municipal Development Plan)** 418
File: 1013-136

Note: this item was tabled to this meeting at the February 16, 2021 special Council meeting

- H. UNFINISHED BUSINESS
- I. COUNCILLOR REPORTS
- J. MANAGEMENT REPORTS
- K. NOTICES OF MOTION
- L. PUBLIC PRESENTATIONS
- M. CLOSED SESSION

N. ADJOURN THE MEETING



PLANNING AND DEVELOPMENT SERVICES

TO: Council
DATE: March 2, 2021 **DIVISION:** 9
TIME: Morning Appointment
FILE: 06731002/4 **APPLICATION:** PL20200031
SUBJECT: Redesignation Item – Industrial Redesignation

Note: This application should be considered in conjunction with the Summit Pit Master Site Development Plan application PL20200034 (agenda item F-1).

APPLICATION: To redesignate the subject lands from Agricultural, General District to Direct Control to accommodate the Summit Pit Master Site Development Plan.

GENERAL LOCATION: Located at the southeast junction of Highway 567 and Range Road 40.

LAND USE DESIGNATION: Agricultural, General District

EXECUTIVE SUMMARY: Council gave first reading to Bylaw C-8051-2020 on June 9, 2020. On July 28, 2020, Council approved a new Land Use Bylaw (C-8000-2020), which came into effect on September 8, 2020. Administration has reviewed the district conversions and confirmed that the originally proposed Direct Control District is the appropriate district under Land Use Bylaw C-8000-2020, and the proposed bylaw has been amended accordingly. In accordance with the policies of the County Plan, a Master Site Development Plan (MSDP) has also been submitted along with the land use application (PL20200034).

The application is consistent with the relevant policies of the County Plan and the Land Use Bylaw:

- The proposal is consistent with the overall goal of the County Plan with respect to natural resource extraction;
- The application is consistent with the policies of Section 15 of the County Plan with respect to minimizing adverse impacts on adjacent lands, working collaboratively with the County and associated agencies, and use of identified haul routes;
- The application is consistent with the development review criteria provided in Section 29 of the County Plan through the accompanying MSDP; and
- The technical aspects of the proposal will be addressed at Development Permit stage.

ADMINISTRATION RECOMMENDATION: Administration recommends approval in accordance with Option #1.

OPTIONS:

- Option #1: Motion #1 THAT Bylaw C-8051-2020 be amended to insert Schedule 'A' and Schedule 'C' as presented in Attachment 'C'
- Motion #2 THAT Bylaw C-8051-2020 be amended as per Attachment 'C'
- Motion #3 THAT Bylaw C-8051-2020 be given second reading, as amended.
- Motion #4 THAT Bylaw C-8051-2020 be given third and final reading, as amended.
- Option #2: THAT application PL20200031 be refused.

Administration Resources

Jessica Anderson, Planning and Development Services



AIR PHOTO & DEVELOPMENT CONTEXT:



APPLICATION EVALUATION:

The application was evaluated based on the technical reports submitted with the application and the applicable policies and regulations.

APPLICABLE POLICY AND REGULATIONS:	TECHNICAL REPORTS SUBMITTED:
<ul style="list-style-type: none"> • <i>Municipal Government Act;</i> • Municipal Development Plan; • Land Use Bylaw; and • County Servicing Standards. 	<ul style="list-style-type: none"> • Air Quality Assessment, prepared by SLR Consulting (Canada) Ltd. dated May 21, 2020 • Acoustic Assessment Report prepared by SLR Consulting (Canada) Ltd. dated May 21, 2020 • Hydrogeological Assessment Report prepared by SLR Consulting (Canada) Ltd. dated January 14, 2020 • Summit Aggregate Pit TIA update prepared by Watt Consulting Group dated March 10, 2020 • Conceptual Stormwater Management Report prepared by SLR Global Environmental Solutions dated January 2020 • Biophysical Impact Assessment (BIA) prepared by SLR Global Environmental Solutions dated January 2020 • Wetland Assessment and Impact Report prepared by SLR global environmental solutions dated February 2020

POLICY ANALYSIS:

The subject lands are not located within the boundaries of an area structure plan; therefore, the proposal was assessed against the County Plan. This report focuses primarily on the compatibility with relevant statutory plans while the associated MSDP application focuses on the technical aspects of the proposal.



County Plan

Section 15.0 Natural Resources of the County Plan states that the County is responsible for approving land use and issuing development permits for all aggregate extractions. Additionally, aggregate pits of all sizes are subject to Provincial legislation.

The goal of the Natural Resource policies is to support the extraction of natural resources in a manner that balances the needs of residents, industry, and society, and to support environmentally responsible management.

15.1. *Minimize the adverse impact of aggregate resource extraction on existing residents, adjacent land uses, and the environment.*

The County currently does not have a comprehensive set of performance standards or spatial policies against which aggregate development can be assessed. However, the technical assessments provided and resulting policies presented in the MSDP effectively address how any adverse impact of aggregate extraction on existing residents, adjacent land uses, and the environment would be managed and mitigated to an acceptable level. The MSDP provides specific policies to address potential offsite impacts of the operation including hours of operation, dust control, noise mitigation, and access improvements. In addition, policies are provided to require continuous monitoring of site conditions and response strategies should the operations exceed the agreed upon limitations.

15.2. *Encourage collaboration between the County, the aggregate extraction industry, and affected residents to develop mutually agreeable solutions to mitigate impacts of extraction activities.*

The Applicant worked with stakeholders to develop policies to effectively address the concerns of adjacent landowners. The Applicant submitted their proposal in accordance with the County's requirements and the mutually agreed upon solutions with respect to access and highway improvements. At Council's direction, the proponent is a member of the Big Hill Springs Aggregate Producers Group who have developed a set of joint operating standards to mitigate cumulative impacts of extraction activities.

15.4. *Direct all aggregate related traffic to identified major haul routes that are monitored and appropriately maintained.*

The Applicant has proposed two haul routes both of which utilize highway infrastructure on routes that are currently classified as major haul routes for traffic.

15.6. *Until such time as a County aggregate extraction policy is prepared, applications for aggregate extraction shall prepare a master site development plan that addresses the development review criteria identified in section 29.*

The supporting MSDP application addresses each of the development review criteria in section 29 and includes an overview of the development proposal, operation details, community consultation and mitigation measures with support of technical reports to address specific items including traffic, water quality, stormwater, vibration, noise, and air quality, etc.

Land Use Bylaw

The Direct Control District is the appropriate land use for the intended operations. A Development Permit is required to approve the use, design, and servicing for the aggregate operations. Several additional uses have been proposed in the district which are not included in the existing Special, Natural Resource District (Natural Resource Industrial District per Bylaw C-4841-97) such as Home Based Business, (Type I & II), Kennels, Office, and Outdoor Storage. The intent of these additional uses is to provide flexibility to the Applicant/Owner in the use of the lands as aggregate extraction develops in phases over time. The intent is to provide for these uses in proximity to the existing dwelling with limitations on size to ensure these uses remain accessory to the primary gravel extraction use. Each of the uses will require a Development Permit



to be considered by the Municipal Planning Commission; therefore, Administration has no concerns with the additional uses proposed.

ADDITIONAL CONSIDERATIONS:

Both of the two quarters proposed for development are currently developed with a dwelling and associated servicing infrastructure provided by way of a well and private sewage treatment system. The remainder of the quarters are currently used for pasture. Access is provided by way of an existing approach from Highway 567 and Range Road 40. The lands are located in an area of the County that is primarily agricultural in nature; however, there is an existing gravel operation less than 1/2 mile to the west. As well, 10 acres were recently redesignated to Industrial, Heavy District to the southwest to accommodate a Volker Steven highway maintenance yard.

The topography in the project area is undulating. The high point is located in the upper northeast portions of the subject lands. The subject lands slope towards the south and east. The majority of the northern portion of the site is relatively flat with a slight southwest facing aspect.

PROVINCAL APPROVALS REQUIRED:

Alberta Transportation

A Roadside Development Permit would be required from Alberta Transportation as the proposed development is within 800 m of a Provincial Highway; the Applicant/Owner would prepare and submit this application subsequent to the approval of the MSDP and land use. The Transportation Impact Assessment has also been submitted to Alberta Transportation for their review and the location and type of intersection upgrades have been prepared in discussions with Alberta Transportation.

Alberta Environment and Parks (Code of Practice for Pits)

All pits greater than five (5) hectares on private land require approval from Alberta Environment through the Code of Practice for Pits. The Code of Practice addresses a number of items including pit operations, reclamation, and environmental monitoring. The Applicant has completed their application for Alberta Environment and Parks to be submitted upon approval of the land use and MSDP.

Alberta Culture Historic Resources

Historic Resource Act Clearance from Alberta Culture is required prior to development on the site. This approval was granted on September 16, 2014.

MASTER SITE DEVELOPMENT PLAN:

The primary intent of the MSDP is to provide a document for Council to review and approve. It provides a policy framework that will directly influence future Development Permit applications on the subject lands. The MSDP is intended to be adopted by Council by resolution, and is intended to be considered concurrently with the redesignation application.

Respectfully submitted,

Concurrence,

“Theresa Cochran”

“Al Hoggan”

Executive Director
Community Development Services

Chief Administrative Officer

JA/lt



ATTACHMENTS:

ATTACHMENT 'A': Application Information

ATTACHMENT 'B': Application Referrals

ATTACHMENT 'C': Bylaw C-8051-2020 and Schedule A, B and C

ATTACHMENT 'D': Map Set

ATTACHMENT 'E': Public Submissions



ATTACHMENT 'A': APPLICATION INFORMATION

<p>APPLICANT: B & A Planning Group (Ken Venner)</p>	<p>OWNERS: 1410266 Alberta Ltd.</p>
<p>DATE APPLICATION RECEIVED: March 10, 2020</p>	<p>DATE DEEMED COMPLETE: March 10, 2020</p>
<p>GROSS AREA: ± 130.69 hectares (± 322.95 acres)</p>	<p>LEGAL DESCRIPTION: NW/SW-31-26-03-W05M</p>
<p>SOILS (C.L.I. from A.R.C.): 4H, F, P, W, T - Severe limitations to cereal crop production due to temperature limiting factors, excessive wetness/poor drainage, low natural fertility, adverse topography (steep and/or long uniform slopes) and excessive surface stoniness.</p>	
<p>HISTORY:</p> <p>September 16, 2019 The Court of Queen’s Bench of Alberta issued a decision setting aside the bylaw providing for redesignation to Natural Resource Industrial District (PL20170184).</p> <p>April 24, 2018 Council approved an application to amend the Summit Master Site Development Plan (PL20170145).</p> <p>April 24, 2018 Council approved an application to redesignate a portion of the lands (136 acres) from Ranch and Farm District to Natural Resource Industrial District (PL20170184).</p> <p>September 26, 2017 Council approved an application to adopt the Summit Master Site Development Plan (PL20150100).</p> <p>July 11, 2017 Council approved an application to redesignate a portion of the lands (25 acres) from Ranch and Farm District to Natural Resource Industrial District (PL20150101).</p>	
<p>PUBLIC & AGENCY SUBMISSIONS:</p> <p>The application was circulated to 48 adjacent landowners; nine (9) letters in support and eighty three (83) in opposition were received in response. The responses have been included in Attachment 'E.'</p> <p>The application was also circulated to a number of internal and external agencies, as depicted in Attachment 'B'; relevant comments are addressed within 'Additional Considerations' above if applicable.</p>	



ATTACHMENT B: APPLICATION REFERRALS

AGENCY	COMMENTS
Province of Alberta	
Alberta Environment and Parks	Summit's hydrological assessment is the best I've seen for all the proposals in the area. It provides useful modelling calculations on the impacts on Big Hill Spring (increase of: .4 L/s to .7 L/s). Also mentioned in the email is our desire to know the impacts of increased flow on the tufa in the park (geological significant feature for Alberta). It would be great if a cumulative impact assessment could evaluate the potential increase in flow from all the proposals and the resulting potential impact on tufa.
Alberta Health Services	<p>Thanks for referring the application to Alberta Health Services (AHS) for review. It's our understanding that this application is for the Summit Aggregate Pit located at W 1/2 31-26-3 W5M. The supporting document AHS has reviewed the provided Summit Pit Master Site Development Plan (MSDP) (dated March 2020) and verifies it is an amendment to the original MSDP (dated September 25 2015), and the subsequent relevant applications, including PL20150100-MSDP PL20150101-Redesignation (dated January 2016), PL 20170145 – Redesignation (dated September 2017) and PL20170184 (dated December 2017).</p> <p>AHS has no concern with the information provided in the MSDP and has no additional comments to those communicated to you before.</p>
Alberta Transportation	<p>In reviewing the application, the proposed development falls within the control distance of a provincial highway as outlined in the Highways Development and Protection Act / Regulation, and will require a roadside development permit from Alberta Transportation.</p> <p>The application form and instructions can be obtained from the department's website at https://www.alberta.ca/roadside-development-permits.aspx.</p> <p>The department has the following additional comments on the referral:</p> <ol style="list-style-type: none"> <li data-bbox="537 1346 1495 1514">1. Ownership of sand and gravel resources is subject to Section 58 of the Land and Property Act, Chapter L-7 RSA 2000. Prior to extraction of these resources beneath a statutory road allowance or road plan, these roads must be closed and disposed of as outlined in Section 22 of the <i>Municipal Government Act</i>, Chapter M-26 RSA 2000. <li data-bbox="537 1535 1479 1724">2. A Traffic Impact Assessment (TIA) shall be prepared by a qualified transportation professional, and reviewed by Alberta Transportation. The TIA must provide information regarding the traffic that could be generated by the proposed development, review safety impacts of the additional traffic, and will identify any necessary upgrades to the Highway intersection. <li data-bbox="537 1745 1446 1877">3. Design and construction of highway improvements to support the proposed development is to be completed at no cost to Alberta Transportation, and to the satisfaction of Alberta Transportation and Rocky View County.



AGENCY	COMMENTS
<p>Internal Departments</p> <p>Planning and Development Services - Engineering</p>	<p>Alberta Transportation has reviewed and accepted the TIA and supplemental information, and will require construction of the Type IV intersection treatment as a condition of development permit approval.</p> <p>General</p> <ul style="list-style-type: none"> • The review of this file is based upon the application submitted. These conditions/recommendations may be subject to change to ensure best practices and procedures. • As the application is for aggregate mining, prior to issuance of future DP, the applicant is to provide payment of the Community Aggregate Payment Levy in accordance with Bylaw C-7748-2018, as amended, in the amount of \$0.40 per ton of aggregate extracted and removed. • At the DP Stage, the applicant is required to provide a Construction Management Plan for the construction of the Type IVa intersection at Range Road 40 and Highway 567 and the paving of Range Road 40 in accordance with County's servicing standards. • At the DP Stage, the applicant will be required to provide a detailed reclamation plan for the Phase I area in accordance with the MSDP and the requirements under the Code of Practice for Gravel Pits published by AEP. The plan shall address: <ul style="list-style-type: none"> ○ the progressive reclamation of the pit in terms of operating and un-reclaimed areas compared to reclaimed areas to ensure a maximum open pit area of 40 acres at any given time; ○ the reclamation monitoring and maintenance plan to ensure the success of the reclamation activities; ○ Implementation of the recommendations of the slope stability assessment prepared in support of reclamation activities. • At the DP stage, the applicant is required to provide a comprehensive landscaping plan, prepared by a qualified Landscape architect, for the Phase I area showing the landscaping elements that are to be incorporated into the berm, setback and entrance areas. • The applicant provided an updated Air Quality Assessment, prepared by SLR Consulting (Canada) Ltd., dated May 21, 2020. The assessment was done to provide an air quality assessment of emissions associated with the activities and operations of the proposed aggregate development. The assessment concluded that the proposed mining operation is not expected to exceed Alberta Ambient Air Quality objectives beyond the subject lands and have limited impact to nearby residences. Some operating best-practice options were recommended to reduce dust emissions such as the application of Calcium Chloride to unpaved roads for dust suppression, adding shrouds to conveyor drops and the application of watering on mine surfaces. The report further recommends crushing equipment(s) should be located at least 190 m from the easterly boundary and 140 m from all other site boundaries.



AGENCY	COMMENTS
	<ul style="list-style-type: none"> • The applicant provided an Acoustic Assessment Report, prepared by SLR Consulting (Canada) Ltd., dated May 21, 2020. The acoustic Assessment was done to assess the potential sound egress from the site operations in relation to the nearest noise sensitive receptors. The assessment concluded that the Summit operations should not exceed the sound level criterion at any noise sensitive receptors, with the inclusion of the proposed acoustic mitigation measures. The mitigation measures are incorporated as policies in Section 17 of MSDP. <p>Geotechnical:</p> <ul style="list-style-type: none"> • The applicant provided a Hydrogeological Assessment Report prepared by SLR Consulting (Canada) Ltd. dated January 14, 2020. The report concludes that the mining of the aggregate resources will be extracted to a maximum of 1.0 m above the maximum level of the groundwater table. No adverse net impact of development at the site on surface water or groundwater users in the vicinity is expected. • At the DP Stage, the applicant will be required to implement a groundwater measurement program and provide the County with new groundwater readings at the boundaries of the Phase I area. The record should provide information on the fluctuations in groundwater levels to ensure gravel extraction activities remain a minimum of 1.0 m above the highest recorded groundwater reading at all times. • At the DP Stage, the applicant is required to implement a groundwater measurement program for which the applicant is to install piezometers within the open pit area to take monthly readings of the groundwater levels to ensure mining activities remain a minimum of 1.0 m above the recorded groundwater levels at all times. The applicant will be required to keep a log to record the readings and be able to provide the County with the log upon request and include the log in the Annual Operations Report. • At the DP Stage, the applicant may be required to provide a Geotechnical Assessment which provides slope stability recommendations for Phase I of the gravel pit. The assessment is to provide recommendations for slope design and setbacks in the active pit areas as well as for final reclaimed conditions. • At the DP Stage, the applicant is required to provide a geotechnical report, prepared by a qualified geotechnical professional, providing a pavement structure design for the Type IVa intersectional improvement at Range Road 40 and Highway 567 and for the pavement structure of Range Road 40 to the satisfaction of AT and the County. <p>Transportation:</p> <ul style="list-style-type: none"> • Access to the site will be via Range Road 40. • The applicant provided an updated TIA, prepared by Watt Consulting Group, dated March 10, 2020. The TIA provided an update to the analysis completed in 2014 for intersection of Highway 567 and Range Road 40. As per the updated TIA, a Type II intersection would be required upon opening



AGENCY	COMMENTS
	<p>day, a Type III intersection at the 10-year horizon and a Type IVa intersection at the 20-year horizon.</p> <ul style="list-style-type: none"> • As per the MSDP, Mountain Ash Limited Partnership intend to construct a Type IVa intersection at Highway 567 and Range Road 40 at the initial Stage 1 of the extraction operation to satisfy the ultimate 20-year horizon. • At the DP Stage, the applicant will be required to enter into a Development Agreement with the County for: <ul style="list-style-type: none"> ○ The upgrade of Range Road 40 to an industrial paved standard (400.6) from Highway 567 to the site access (approximately 400 m); ○ Upgrade of the intersection of Range Road 40 and Highway 567 to a Type IVa standard including all signage and any other roadside indicators to the satisfaction of AT; ○ Implementation of the recommendations of the geotechnical report and pavement structure design; ○ Implementation of the recommendations of the Construction Management Plan; and ○ Implementation of the recommendations of the illumination and climbing lane warrants as required. • At the DP stage, the applicant is required to provide an intersection illumination warrant analysis, prepared by a qualified professional, to determine if any illumination is warranted at the Type IVa intersection of Range Road 40 and Highway 567. • At the DP stage, the applicant is required to provide a climbing lane warrant, prepared by a qualified professional, to determine if there is a need for a climbing lane to allow for the safe entrance of truck traffic onto the highway from the intersection of Range Road 40 and Highway 567. Should a climbing lane is warranted, the construction of climbing lane is required to be done through a Development Agreement. • It was noted in the MSDP, Phase 5 of the operation proposes to excavate and mine under the Road Allowance at Range Road 40, which currently provides access to multiple properties. The applicant will be required to close and consolidate road allowance and obtain appropriate approvals to mine within the Road Allowance. • At the DP stage, the applicant will be required to provide a Traffic Management Plan in accordance with Joint Operating Standards which shall address: <ul style="list-style-type: none"> ○ measures to control driving behavior of aggregate haulers; ○ use and monitoring of in-vehicle monitoring systems; ○ turning movements onto the Highway to provide recommendations to optimize safety of Highway users; and ○ measures to be implemented to prevent the transfer of aggregate and other detritus materials onto the Highway and local road network.



AGENCY	COMMENTS
	<p>At the DP stage, the applicant will be required to provide payment of the Transportation Offsite Levy, in accordance with the current levy for the total gross acreage of the gravel pit and areas associated with gravel extraction activities.</p> <p>Sanitary/Waste Water:</p> <ul style="list-style-type: none"> As per the MSDP, the sanitary servicing will be provided by portable facilities. Engineering has no concerns at this time. <p>Water Supply And Waterworks:</p> <ul style="list-style-type: none"> As per the MSDP, the water servicing will be provided by portable facilities. Engineering has no concerns at this time. <p>Stormwater Management:</p> <ul style="list-style-type: none"> The applicant provided a Conceptual Stormwater Management Report prepared by SLR Global Environmental Solutions dated January 2020, which provides the overall stormwater management concept for the gravel pit. The stormwater management strategy will be implemented over six phases as the site develops. The surface water management measures for each stage include perimeter and interception ditches, settlement ponds and discharge sumps. At the DP stage, the applicant will be required to provide a detailed stormwater management plan for the Phase I pit area, which follows the stormwater management concepts outlined in the SLR Global Environmental Solutions Report dated January 2020 and meets the requirements of the County Servicing Standards. It's to be noted that stormwater ponds are required to be lined to avoid contamination of groundwater and risk mobilizing existing contaminants in the soil or groundwater. As the concept relies on the discharge of stormwater via groundwater discharge sumps, the applicant will be required to provide confirmation of AEP approval for the implementation of the discharge sumps for any release to the environment. At the DP stage, the applicant will be required to provide an Erosion & Sedimentation Control Plan (ESC) prepared by a qualified professional, providing the ESC measures to be implemented onsite during the operation of the pit in accordance with the MSDP and the requirements of the County Servicing Standards. At the DP Stage, the applicant will be required to provide an Erosion & Sedimentation Control (ESC) Plan prepared by a qualified professional, providing the ESC measures to be implemented for the construction of the Type IVa intersectional at Range Road 40 and Highway 560 and the paving of Range Road 40. <p>Environmental:</p> <ul style="list-style-type: none"> The applicant provided a Biophysical Impact Assessment (BIA) prepared by SLR Global Environmental Solutions dated January 2020.



AGENCY	COMMENTS
Transportation Services	<ul style="list-style-type: none"> • Following are the findings of BIA <ul style="list-style-type: none"> ○ Soil: The on-site soils have low wind erosion risk and moderate water erosion risk; no sensitive soils were observed within the Project area during the field investigation. ○ Vegetation: Vegetation in the project area has been heavily modified by agricultural land use. No rare plants were found in the Project area. No prohibited or noxious weeds listed under the Weed Control Act were observed. ○ Wildlife: Provincially sensitive species and federally listed species have the potential to be present within the Project area. The Project area consists of primarily disturbed habitat and the area surrounding the Project consists of a similar intensive agricultural land use. The Project is expected to result in minimal loss of wildlife habitat, and no interaction with or disturbance to species at risk. ○ Wetland: 20 wetlands are present within the project area and close vicinity. Based on the conceptual footprint for the Project, the two larger wetlands in the northwest corner of the Project area and 4 wetlands in the sensitive SW corner of the Project area will be avoided. The other 14 wetlands will be removed to accommodate planned development phases through AEP approval. ○ Water Resources: No mapped watercourses were identified in the Project area during the desktop review, and no obvious drainages were observed during the field assessment. • It was noted in the BIA through a hydrological assessment that the groundwater beneath the Project area eventually discharges at the Big Hill Springs. It is proposed that the excavation will be operated “dry” (i.e., above the water table, with no dewatering needed). The study determined that the wetlands are all surface water fed, with no permanent groundwater source. • As per the BIA, the area has a high potential to contain a historic resource of archeological concern. Prior to issuance of future DP, the applicant will be required to obtain clearance under the Historical Resources Act prior to commencing with mining activities. • The applicant provided a Wetland Assessment and Impact Report, prepared by SLR global environmental solutions, dated February 2020. As per the Wetland assessment and impact report, no mapped watercourses are identified within the project area. A total of 20 wetlands were identified for the project area and assesses in the field. Submission under the Water Act and the Public Lands Act will be required for the disturbance to these wetlands. • At the DP stage, the applicant will be required to obtain all permits and approvals under the Water Act and public lands act for any wetlands that may be impacted due to the gravel extraction activities. <p>For gravel pit operations applicant to be reminded to adhere to the conditions within the County’s Community Aggregate Payment (CAP) Levy Bylaw.</p>



AGENCY	COMMENTS
Agricultural & Environmental Services	<p>Applicant to be reminded to adhere to the conditions identified within the County Noise Bylaw.</p> <p>Application involves Development along Alberta Transportation Road Allowance. Therefore recommend applications to be circulated to Alberta Transportation for review and comments.</p> <p>It may be of benefit to the applicant to create a Weed Management Plan and have a contractor available (or be personally prepared) to control any regulated weeds. The applicant will need to ensure compliance with the Alberta Weed Control Act.</p>

Circulation Period: (April 7, 2020 to April 30, 2020)

Agencies that did not respond, expressed no concerns, or were not required for distribution, are not listed.



BYLAW C-8051-2020

A Bylaw of Rocky View County to amend *Land Use Bylaw C-4841-97* ~~C-8000-2020~~

The Council of Rocky View County enacts as follows:

~~PART 1 – Title~~

1 This Bylaw shall be known as Bylaw C-8051-2020.

~~PART 2 – Definitions~~

2 Words in this Bylaw have the same meaning as those set out in the Land Use Bylaw and Municipal Government Act except for the definitions provided below:

- (1) “Council” means the duly elected Council of Rocky View County;
- (2) “Land Use Bylaw” means Rocky View County Bylaw C-8000-2020, being the Land Use Bylaw, as amended or replaced from time to time;
- (3) “Municipal Government Act” means the Municipal Government Act, RSA 2000, c M-26, as amended or replaced from time to time; and
- (4) “Rocky View County” means Rocky View County as a municipal corporation and the geographical area within its jurisdictional boundaries, as the context requires.

~~In this Bylaw the definitions and terms shall have the meanings given to them in Land Use Bylaw C-8051-2020 C-8000-2020 and the Municipal Government Act.~~

~~PART 3 – Effect OF BYLAW~~

3 THAT Schedule B, Land Use Maps, ~~Part 5, Land Use Map No. 67~~ of Bylaw C-8051-2020 ~~C-8000-2020~~ be amended by redesignating NW/SW-31-26-03-W05M from ~~Ranch and Farm(RF)~~ **Agriculture, General District (A-GEN)** to Direct Control District (DC) as shown on the attached Schedule 'B' forming part of this Bylaw.

4 THAT NW/SW-31-26-03-W05M is hereby redesignated to Direct Control District (DC) as shown on the attached Schedules 'A', 'B' and 'C' forming part of this Bylaw.

~~PART 4 – TRANSITIONAL Effective Date~~

5 Bylaw C-8051-2020 is passed and comes into full force and effect when it receives third reading and is signed in accordance with the Municipal Government Act. ~~by the Reeve/Deputy Reeve and the Municipal Clerk, as per Section 189 of the Municipal Government Act.~~

Division: 9
File: 06731002/4/ PL20200031



ROCKY VIEW COUNTY

READ A FIRST TIME this _____ day of _____, 20__

PUBLIC HEARING HELD this _____ day of _____, 20__

READ A SECOND TIME this _____ day of _____, 20__

READ A THIRD AND FINAL TIME this _____ day of _____, 20__

Reeve

Chief Administrative Officer or Designate

Date Bylaw Signed



SCHEDULE 'A'

FORMING PART OF BYLAW C-8051-2020

A Direct Control District affecting the NW/SW-31-26-03-W05M, consisting of a total of ± 322.95 acres of land.

1.0.0 GENERAL REGULATIONS

- 1.1.0 The policies of the Mountain Ash Summit Pit Master Site Development Plan shall be applied in all applications for Development Permit.
- 1.2.0 Parts 1, 2, 3, 4, 5 and 8 of the Land Use Bylaw C-8000-2020 shall apply to all uses contemplated by this Bylaw except where noted as otherwise in this Bylaw.
- 1.3.0 All regulations applicable to the Special, Natural Resources (S-NAT) shall apply to this Bylaw, unless otherwise stated.
- 1.4.0 The Development Authority shall be responsible for the issuance of Development Permits for the Lands subject to this Bylaw.
- 1.5.0 All development upon the Lands shall be in accordance with all licenses, permits and approvals pertaining to the Lands required from Alberta Environment and any other Provincial Agencies.
- 1.6.0 No Development Permit shall be issued for any purpose until the applicable Development Regulations in Section 3.0.0 of this Bylaw have been met.

2.0.0 LAND USE REGULATIONS

2.1.0 Purpose and Intent

To accommodate a comprehensively planned Natural Resource Extraction/Processing operation to be implemented in accordance with a program of staged mining & excavation phases associated with a corresponding series of Development Permit approvals as contemplated by the Mountain Ash Summit Aggregate Pit Master Site Development Plan. Portions of the site not being actively used to support resource extraction activities may accommodate general agriculture and other uses that do not detract from the principal uses within the site.

2.2.0 Uses

- 2.2.1 Accessory Buildings > 250 m² (2,690.98 ft²)
- 2.2.2 Agriculture (General)
- 2.2.3 Communications Facilities (Types A, B & C)
- 2.2.4 Dwelling Unit, Accessory to Principal Use
- 2.2.5 Natural Gas Plant
- 2.2.6 Home Based Business (Type I & II)
- 2.2.7 Kennel
- 2.2.8 Natural Resource Extraction/Processing



2.2.9 Outdoor Storage

2.3.0 Minimum and Maximum Requirements

- 2.3.1 Minimum parcel size: **64.35 ha (159 ac)**
- 2.3.2 Maximum building height (*Principal Buildings*): 10.0 m (32.81 ft)
- 2.3.3 Maximum building height (*Accessory Building*): 5.5 m (18.04 ft)
- 2.3.4 Maximum building area (*Accessory Building*): 400 m² (5,381.95 ft)
- 2.3.5 Maximum number of Accessory Buildings: 3
- 2.3.6 Maximum parcel coverage (*All Buildings*): 35%
- 2.3.7 Maximum total area of ancillary uses (Outdoor Storage and Kennel): 8.09 ha (20.0 ac)

2.4.0 Required Setbacks

2.4.1 **Minimum Yard, Front:**

- a) 60.0 m (196.85 ft) from any Road, Highway
- b) 30.0 m (98.43 ft) from any Road, County or Road, Internal Subdivision
- c) 15.0 m (49.21 ft) all others

2.4.2 **Minimum Yard, Side:**

- a) 60.0 m (196.85 ft) from any Road, Highway
- b) 30.0 m (98.43 ft) from any Road, County or Road, Internal Subdivision
- c) 15.0 m (49.21 ft) all others
- d) Zero setbacks may be permitted between parcels subject to the Mountain Ash Summit Master Site Development Plan.

2.4.3 **Minimum Yard, Rear:**

- a) 60.0 m (196.85 ft) from any Road, Highway
- b) 30.0 m (98.43 ft) from any Road, County or Road, Internal Subdivision
- c) 15.0 m (49.21 ft) all others

3.0.0 DEVELOPMENT REGULATIONS

3.1.0 Development Permit Application Requirements

- 3.1.1 Development Permit applications for each phase of Natural Resource Extraction/Processing shall include the following:
 - a) Site Development Plan
 - b) Operations & Management Plan



- c) Site-Specific Stormwater Management Plan
 - d) Groundwater Monitoring Plan
 - e) Traffic Impact Assessment and Transportation Infrastructure Improvement Plan
 - f) Truck Haul Route Plan
 - g) Mining and Excavation Plan
 - h) Stripping and Grading Plan
 - i) Landscaping and Visual Screening Plan
 - j) Dust Control Plan
 - k) Air Quality Monitoring Plan
 - l) Noise Impact Assessment
 - m) Noise Monitoring Plan
 - n) Biophysical Impact Assessment
 - o) Construction Management Plan
 - p) Sediment and Erosion Control Plan
 - q) Weed Management Plan
 - r) Post-Mining Reclamation Plan
 - s) Good Neighbour Action Plan
- 3.1.2 Development Permit applications for each ancillary use including Home-Based Business, Kennel and Outdoor Storage shall include the following:
- a) An updated Traffic Impact Assessment
 - b) An access management plan
 - c) A compatibility and transitions plan to demonstrate how the proposed uses do not detract from the principle uses on the site.
- 3.2.0 Hours of operations for Natural Resource Extraction/Processing activities shall be:
- a) Mondays to Fridays from 7 AM to 7 PM
 - b) Saturdays from 7 AM to 5 PM
 - c) No Natural Resource Extraction/Processing uses on Sundays and/or Statutory Holidays
- 3.3.0 Natural Resource Extraction/Processing uses may only occur within the area generally illustrated on Schedule "B", attached to and forming part of this Bylaw.
- 3.4.0 Approved Development Permits for Natural Resource Extraction/Processing uses shall be subject to a five (5) year renewal period.



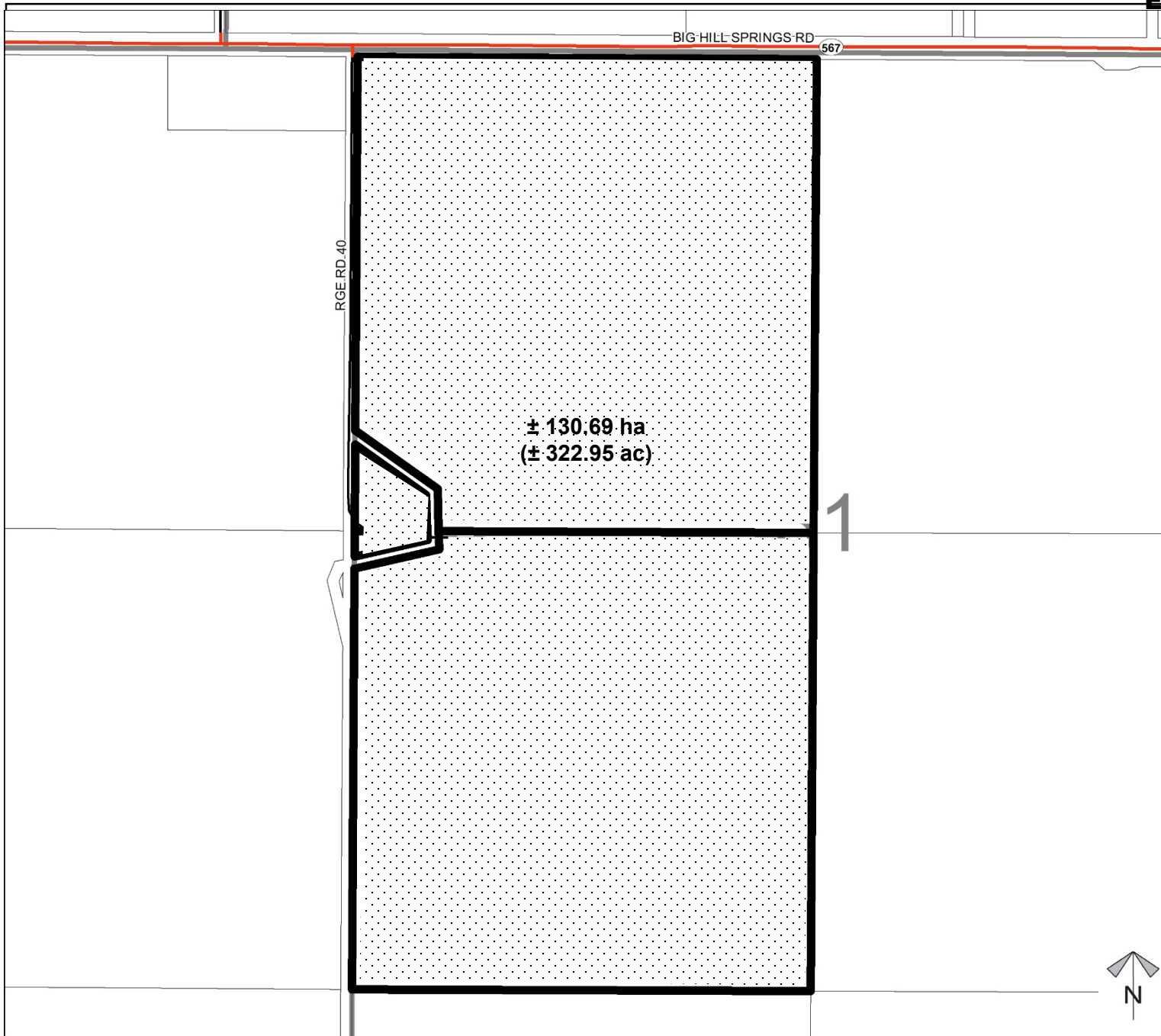
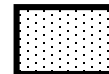
- 3.5.0 A *Dwelling Unit, Accessory to Principal Use* shall not be located within 150 m of the extent of an active phase of the Natural Resource Extraction/Processing operation. Measures to mitigate potential adverse impacts *shall* be assessed by the *Development Authority* when issuing a permit for a *Dwelling Unit, Accessory to Principal Use*.
- 3.6.0 No Natural Resource Extraction/Processing uses shall occur within the MSDP area without an approval from Alberta Environment and Parks (AEP) in accordance with the requirements of the *Code of Practice for Pits*.
- 3.7.0 With the exception of Agriculture (General), all uses contemplated by this Bylaw shall be considered secondary to the principal use and shall not be permitted to occur without an approved development permit for Natural Resource Extraction/Processing.
- 3.8.0 Development permits for all uses contemplated by this Bylaw must be supported by a rationale that describes how the proposed development can operate within the site without being negatively affected by and/or limiting the continued viability of Natural Resource Extraction/Processing.

Schedule 'B'

Bylaw
C-8051-2020

Amendment

FROM
Agricultural, General District
Ranch and Farm District
TO
Direct Control
District



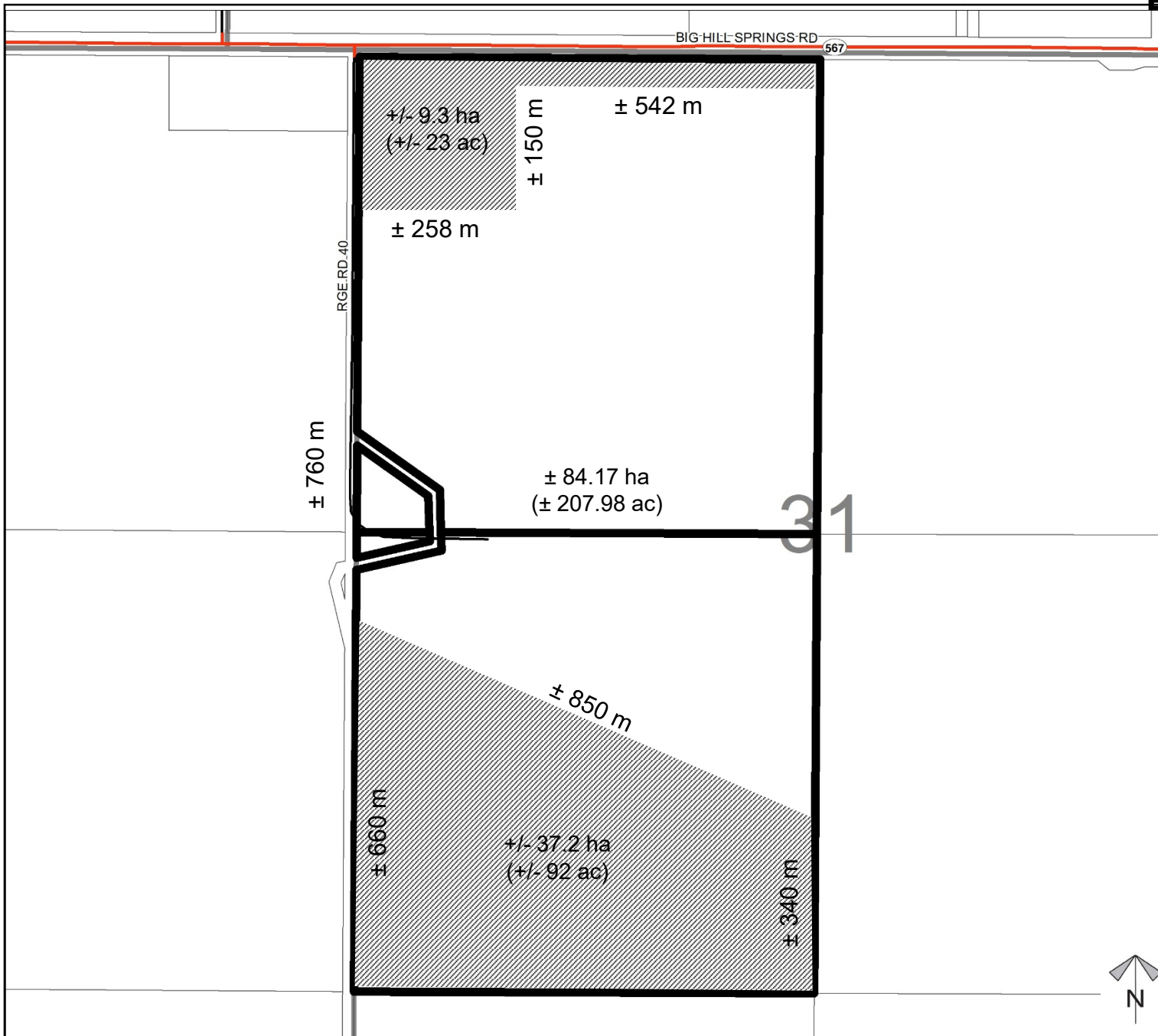
Schedule 'C'

Bylaw
C-8051-2020

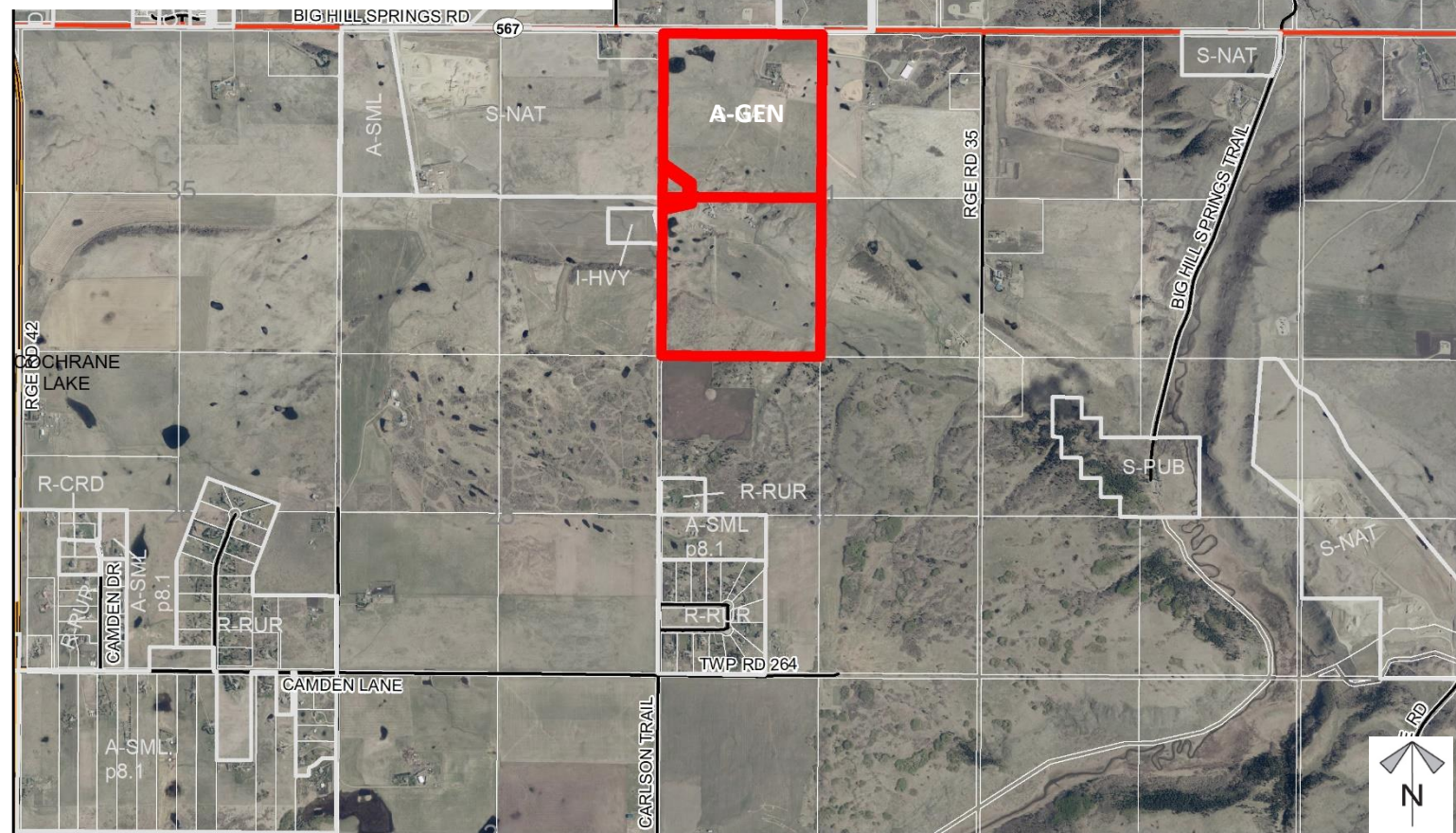
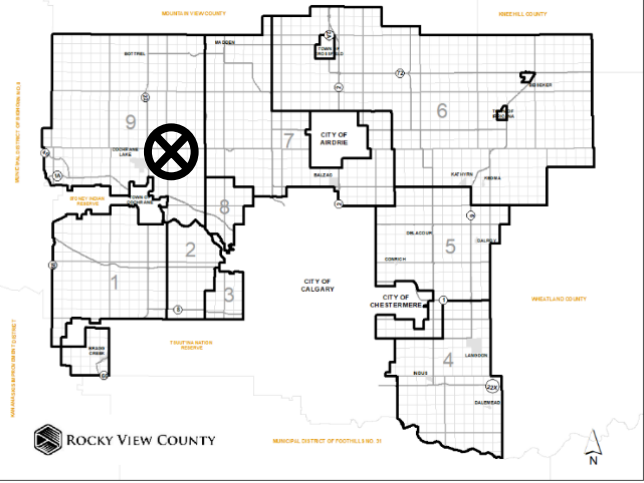
Mining & Excavation
Activities Not Permitted



Mining & Excavation
Activities Permitted



Location
& Context





Development Proposal:

To redesignate the subject lands from Agricultural, General District to Direct Control District to accommodate aggregate extraction.

Division: 9
Roll: 06731002/1004
File: PL20200031
Printed: November 3, 2020
Legal: SW/NW-31-26-03-
Page 25 of 726

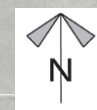
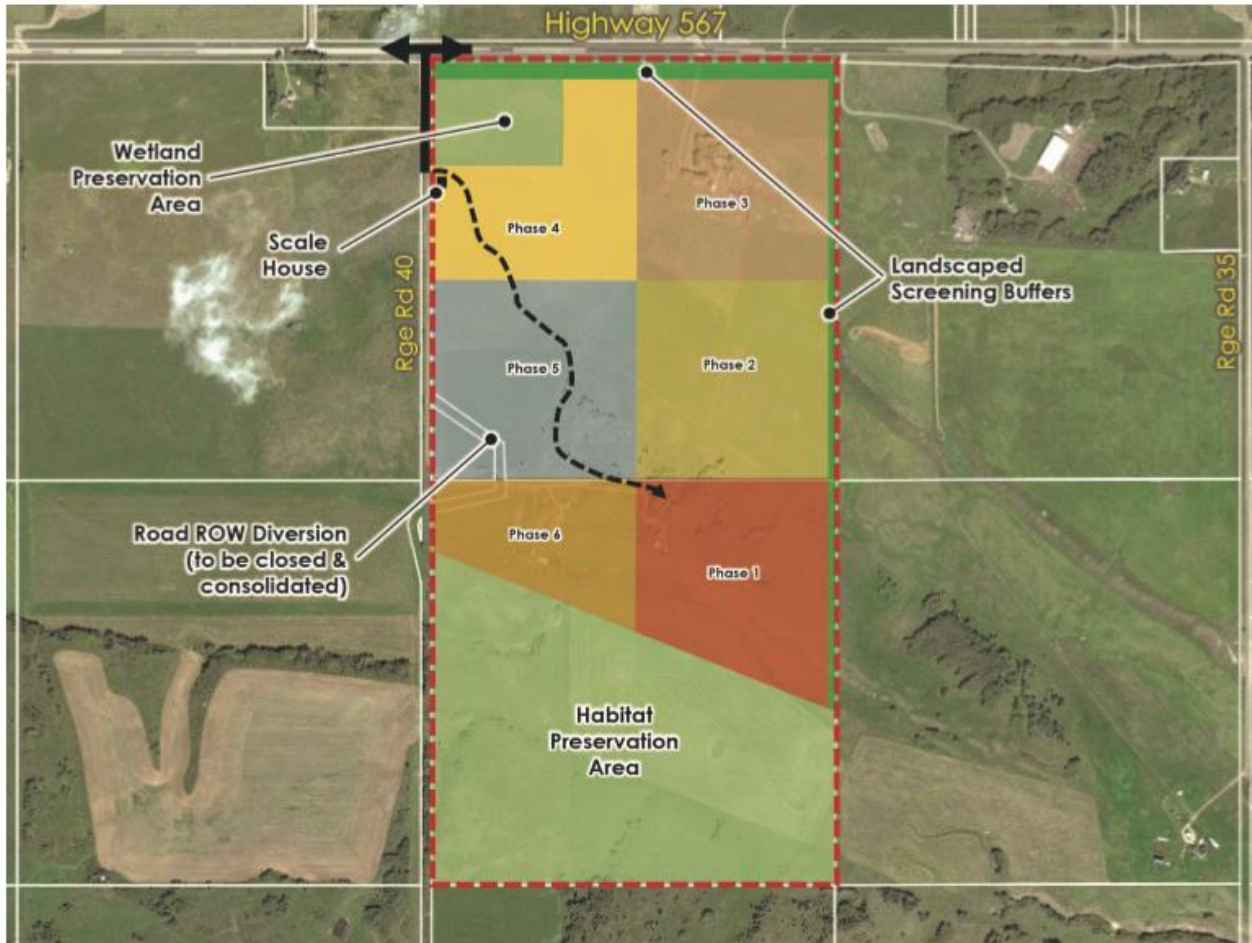


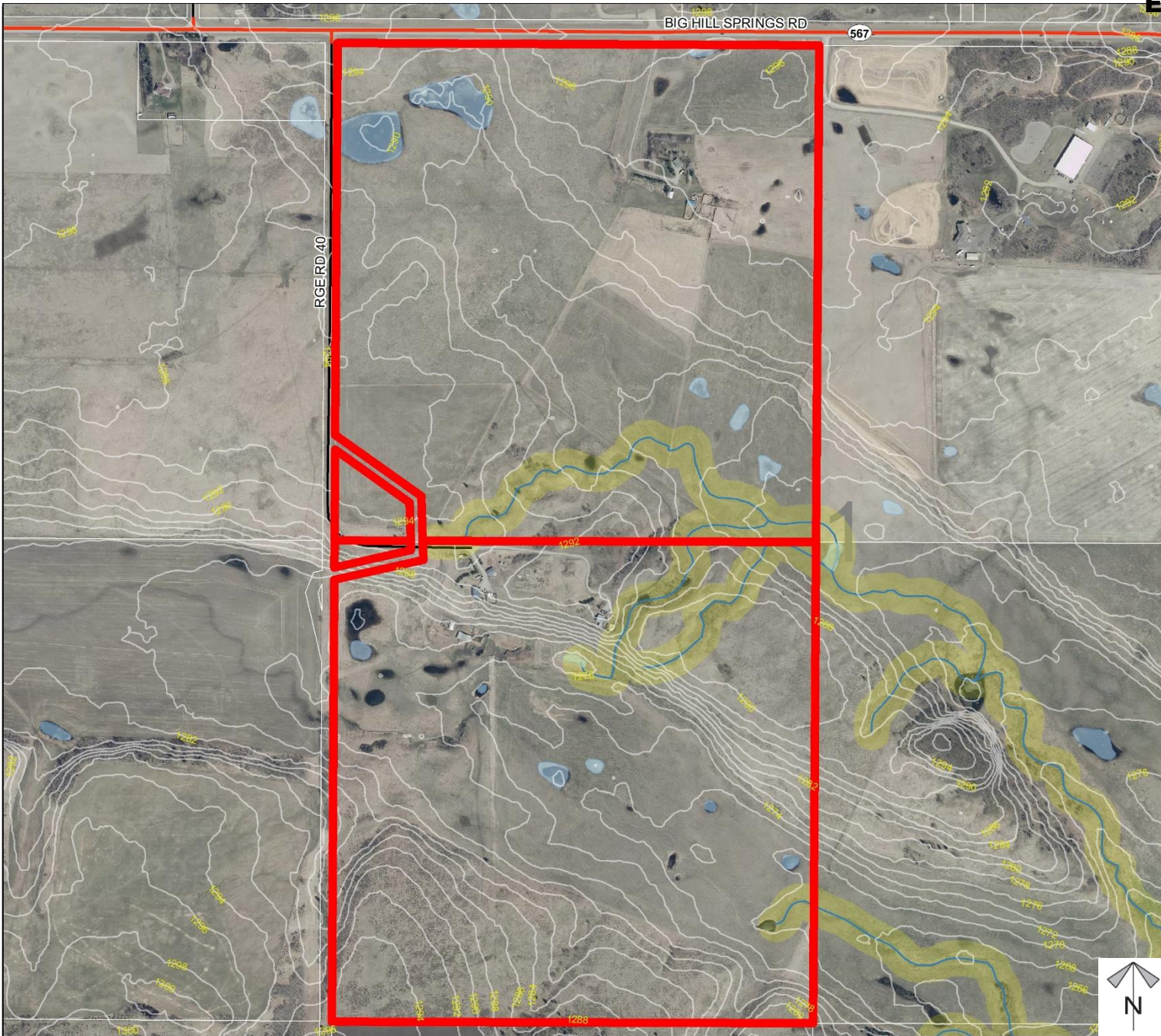
Figure 7: Development Concept



MSDP Proposal:
To adopt the Summit Pit
Master Site
Development Report to
provide for aggregate
extraction on the site.



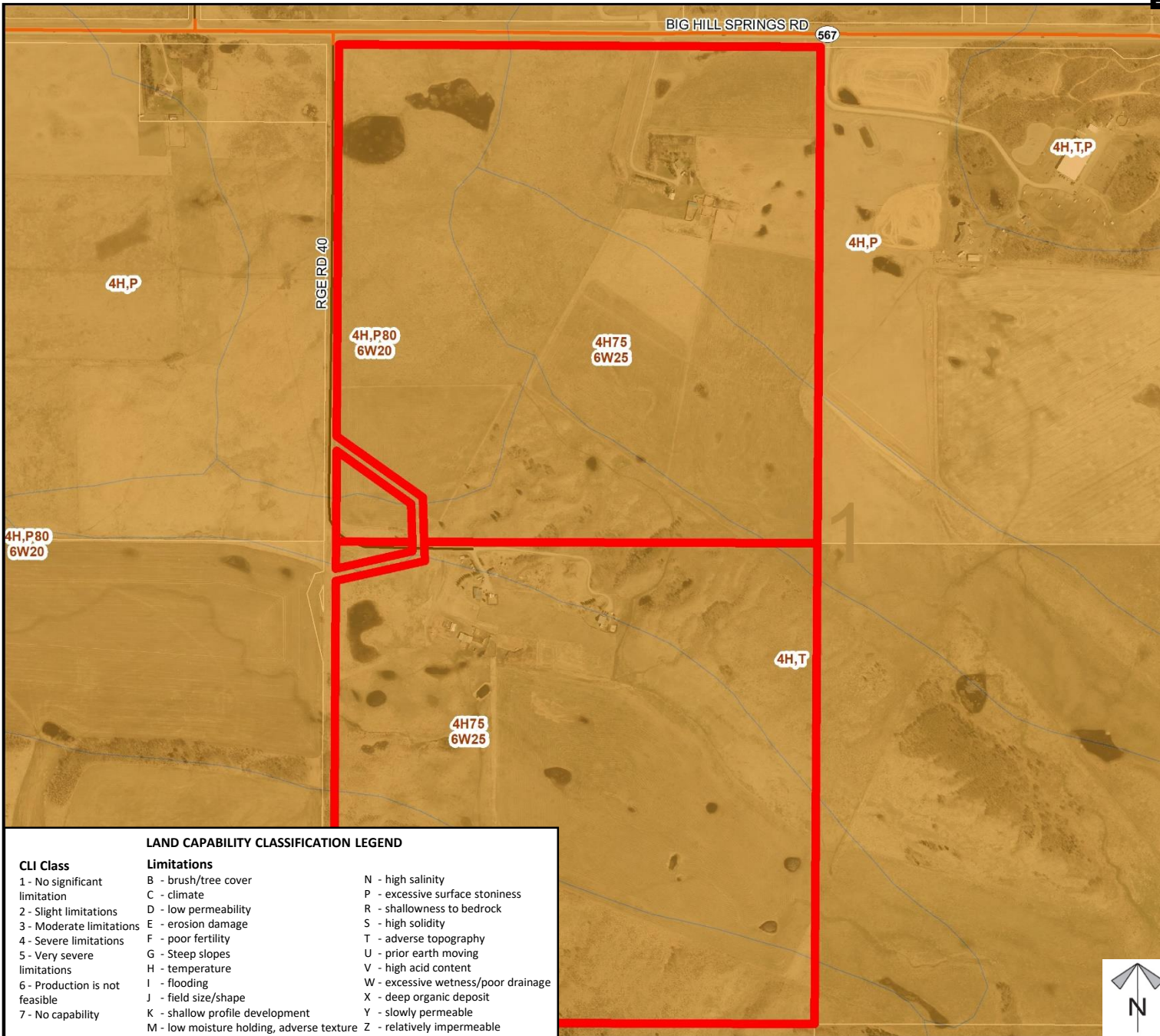
Environmental



-  Subject Lands
-  Contour - 2 meters
-  Riparian Setbacks
-  Alberta Wetland Inventory
-  Surface Water

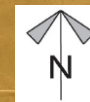
Division: 9
 Roll: 06731002/1004
 File: PL20200031
 Printed: November 3, 2020
 Legal: SW/NW-31-26-03-
 W9a Page 27 of 726

Soil Classifications

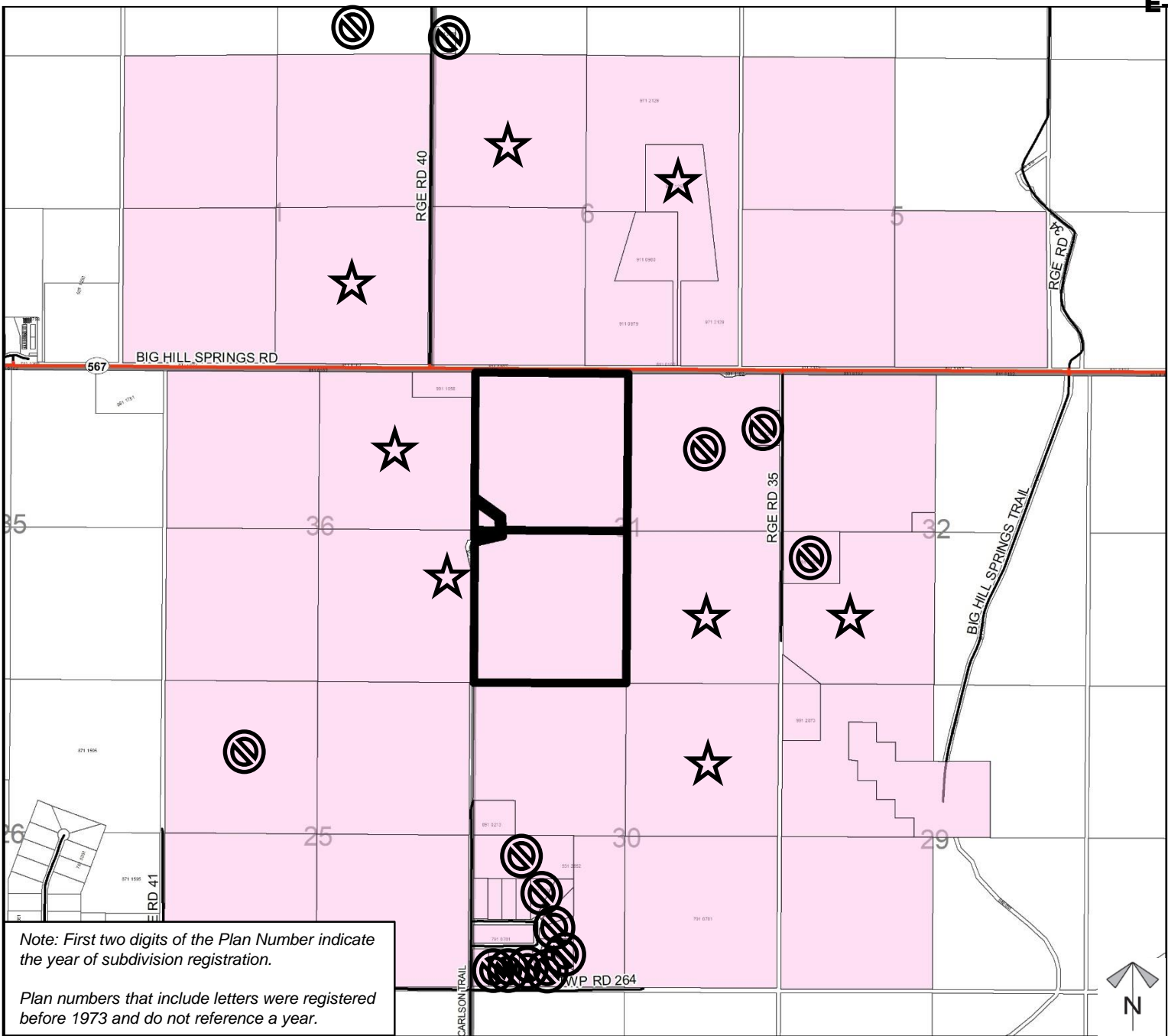


LAND CAPABILITY CLASSIFICATION LEGEND



CLI Class	Limitations	
1 - No significant limitation	B - brush/tree cover	N - high salinity
2 - Slight limitations	C - climate	P - excessive surface stoniness
3 - Moderate limitations	D - low permeability	R - shallowness to bedrock
4 - Severe limitations	E - erosion damage	S - high solidity
5 - Very severe limitations	F - poor fertility	T - adverse topography
6 - Production is not feasible	G - Steep slopes	U - prior earth moving
7 - No capability	H - temperature	V - high acid content
	I - flooding	W - excessive wetness/poor drainage
	J - field size/shape	X - deep organic deposit
	K - shallow profile development	Y - slowly permeable
	M - low moisture holding, adverse texture	Z - relatively impermeable



Landowner Circulation Area



Legend

- Support 
- Opposition 

Note: First two digits of the Plan Number indicate the year of subdivision registration.

Plan numbers that include letters were registered before 1973 and do not reference a year.

From: [Dominic Kazmierczak](#)
To: [Jessica Anderson](#)
Subject: FW: [EXTERNAL] - Bylaw C-8090-2020 AND C-89051- 2020 (Mountain Ash Application PL 2020-0103). Gravel pits
Date: January 27, 2021 2:52:44 PM

Submission for Mountain Ash public hearing below.

DOMINIC KAZMIERCZAK
Manager | Planning Policy

ROCKY VIEW COUNTY
262075 Rocky View Point | Rocky View County | AB | T4A 0X2
Phone: 403-520-6291
DKazmierczak@rockyview.ca | www.rockyview.ca

-
This e-mail, including any attachments, may contain information that is privileged and confidential. If you are not the intended recipient, any dissemination, distribution or copying of this information is prohibited and unlawful. If you received this communication in error, please reply immediately to let me know and then delete this e-mail. Thank you.

From: Michelle Mitton <MMitton@rockyview.ca>
Sent: January 27, 2021 2:16 PM
To: Dominic Kazmierczak <DKazmierczak@rockyview.ca>
Subject: FW: [EXTERNAL] - Bylaw C-8090-2020 AND C-89051- 2020 (Mountain Ash Application PL 2020-0103). Gravel pits

MICHELLE MITTON, M.Sc
Legislative Coordinator – Legislative Services

ROCKY VIEW COUNTY
262075 Rocky View Point | Rocky View County | AB | T4A 0X2
Phone: 403-520- 1290 |
MMitton@rockyview.ca | www.rockyview.ca

From: D Reid [REDACTED]
Sent: Tuesday, January 26, 2021 9:33 PM
To: Legislative Services Shared <LegislativeServices@rockyview.ca>
Subject: [EXTERNAL] - Bylaw C-8090-2020 AND C-89051- 2020 (Mountain Ash Application PL 2020-0103). Gravel pits

Do not open links or attachments unless sender and content are known.

Dear Rocky View Council:

I am writing to you in regards to the various plans to open more gravel pit mines in RVC (for example Bylaw C-8090-2020 AND C-8051- 2020 Mountain Ash Application PL

2020-0103).

I am particularly concerned with two aspects:-

- in general, the idea of operating more gravel pits near existing and well established residential is an appalling action to take.
- more specifically, the plans to start a number of new gravel operations nearby, and just northwest of, the Big Hill Springs Provincial Park is a serious mistake.

RVC should not be allowing industrial and mining operations that will significantly interfere with well established residential communities due to noise and dust pollution, constant heavy truck traffic, road congestion, road damage, serious harm to wildlife, the overall detrimental environmental effects, visual pollution, and of course the lowering of house and property value.

Furthermore, once one industrial operation is allowed this will encourage yet more industry. If a single mine is opened it is inevitable that more will be allowed. I do not see any examination of the **cumulative effects of a number of mining operations**. Has anyone examined the cumulative effects? This must be done before any new mine operations are started.

The income that RVC gains from gravel pit operations will not cover the costs of environmental remediation, road repair and construction.

Reclamation to the original conditions before the start of mining is difficult and in my experience is never achieved. The mining and oil industry in Alberta has an appallingly poor record of environmental remediation. Just look at the numerous orphaned oil wells all over Alberta, the utter shambles of the unsuccessful attempts to remediate oil sands, and all the old abandoned open pit coal mines.

If the aquifer source of the Big Hill Springs is negatively impacted by gravel mining, the Big Hill Creek (and its various fish species) will of course also be harmed. It seems highly probable that the aquifer will be affected by the mining operations. It is impossible to repair the subsequent damage to an area of unique geological, biological and ecological interest. Damaging this special and much loved place is foolish and shortsighted.

I have read the engineering reports produced for the gravel pit companies that purport demonstrate these the mining operation will not cause environmental harm. Here I speak as a research biologist with 50 years of experience and I am most unimpressed by their scientific quality or depth of these reports. In my estimation it seems likely that the aquifer will be negatively affected by the gravel operations.

Sincerely,
David M. Reid
Professor of Biology (Emeritus).

20 Poplar Hill Place, Calgary AB T3R 1C7 (This is in the north end of the Bearspaw district)



Michelle Mitton

From: Aaron Hamilton [REDACTED]
Sent: Friday, February 5, 2021 5:00 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C8051-2020

Follow Up Flag: Follow up
Flag Status: Completed

Do not open links or attachments unless sender and content are known.

Dear Rocky View County Council,

Please do NOT allow an open gravel pit anywhere near the Big Hill Springs Provincial park. This area is very environmentally sensitive. Not only will it destroy the park but the dig will also contaminat the Big Hill Creek.

This is a beautiful and special area enjoyed by thousands of Albertans all year round. We love the area!♥

I do not support this!!!!
PLEASE STOP THE GRAVEL PIT!!!

Aaron Hamilton
175 Jumping Pound TC
Cochrane Ab

Michelle Mitton

From: Alan Welch [REDACTED]
Sent: Friday, February 5, 2021 10:15 AM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C8051-2020

Follow Up Flag: Follow up
Flag Status: Completed

Do not open links or attachments unless sender and content are known.

Dear Sir or Madam,

I strongly **oppose** the new project called the summit pit!

I am not affiliated with any of the concerning parties, but I am a passionate Albertan who enjoys the beauty of Alberta. It saddens me immensely that beautiful areas that have been designated as parks, all of a sudden have land just outside that boundary, repurposed and in this instance to what can only be described, as a noisy, irritating eyesore and an environmental catastrophe. Not to mention the potential for harmful carcinogens being released by the dust that these pits ultimately produce.

Please do not grant this excavation your approval.

Kind regards
Alan Welch

Resident of Cochrane, Alberta

Michelle Mitton

From: Christyann Olson <colson@abwild.ca>
Sent: Sunday, February 14, 2021 11:55 AM
To: Legislative Services Shared
Subject: [EXTERNAL] - AWA Submission to Rocky View Country Aggregate Operations Land Redesignation Hearing
Attachments: 20210214_It_awa_rocky view_county_bylaw C-80521-202 redesignation_aggregate_operations__.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

Dear Reeve Daniel Henn,
Please find Alberta Wilderness Association's (AWA) letter of submission for consideration at the Rock View County Hearing on the matter of redesignation of agricultural land to allow aggregate operations on lands immediately adjacent to Big Hill Springs Provincial Park.

AWA respectfully requests that the application to redesignate the land from Agricultural, General District to Direct Control District to facilitate aggregate operations be denied

Sincere best regards,
Christyann

Christyann Olson
Executive Director

Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

455-12 St NW Calgary, AB T2N 1Y9

403.283.2025 www.AlbertaWilderness.ca

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ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

Rocky View County Reeve Daniel Henn
legislativeservices@rockyview.ca

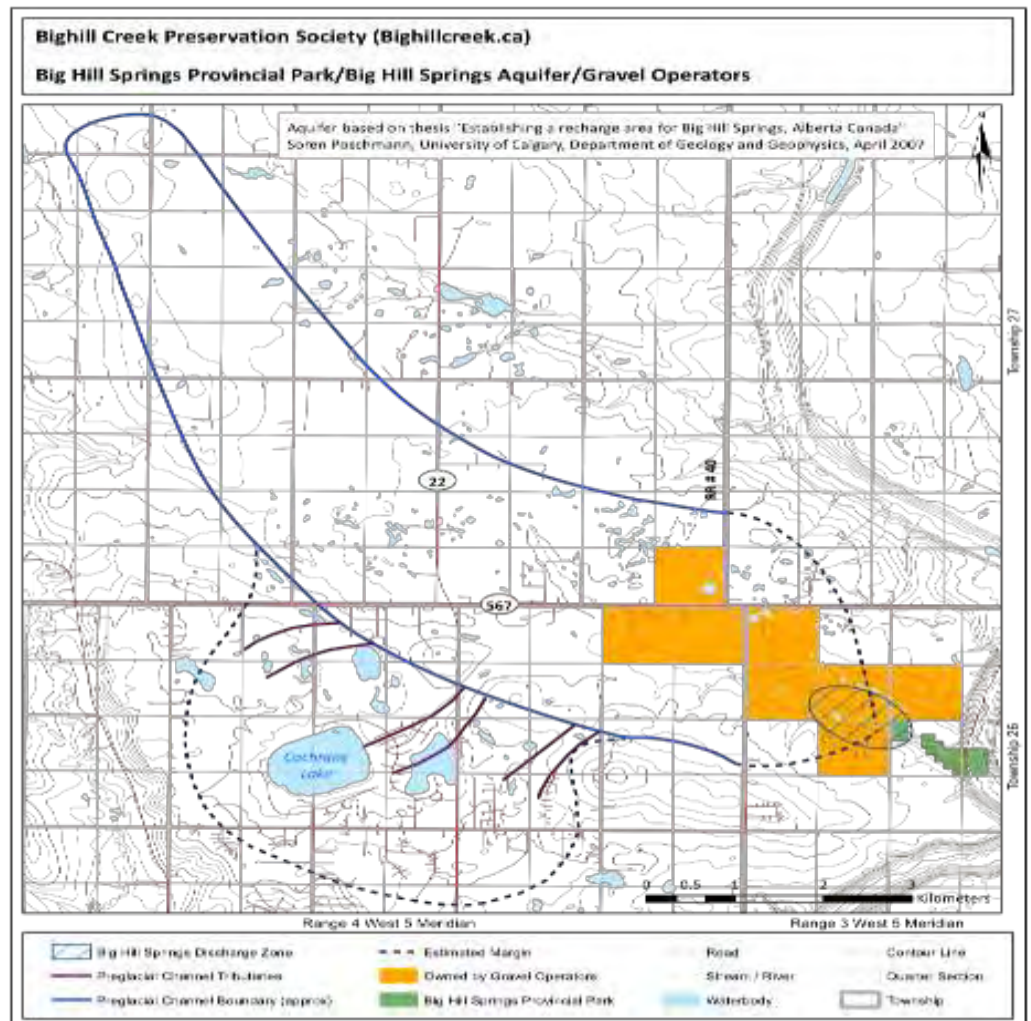
February 15, 2021

AWA Submission to Rocky View Country Aggregate Operations Land Redesignation Hearing,
Bylaw C8051-2020, PL20200031, Mt. Ash LP.

Alberta Wilderness Association (AWA), founded in 1965, works throughout Alberta towards more representative and connected protection of the unique and vital landscapes that are the source of our clean water, clean air and wildlife habitat. With more than 7,000 members and supporters AWA remains committed to ensuring protection of wildlife and wild places in Alberta for all Canadians.

It has come to our attention that Rocky View County (RVC) will consider an application for redesignation of agricultural land at a public hearing March 2, 2021, that would allow the first of four aggregate operations immediately northwest of Big Hill Springs Provincial Park.

The proposed aggregate operations would be developed on lands above the aquifer that feed the unique springs that are vital to the functioning and vitally important natural features of the park. The map on the right provided by the Bighill Creek Preservation Society clearly shows the Big Hill springs aquifer and proposed gravel operations.



Big Hill Springs Provincial Park is small in size at only 70 acres, but stands out as one of the first parks established in Alberta because of features that have drawn visitors for more than a hundred years. Its beauty is based on a variety of nationally and provincially significant features of ever greater value to a recreating public. The park is well known and used today, with at least 250,000 annual visitors. In recent years, AWA provided interpretive opportunities at the park that saw children examine the waterfall, learn how to do kick samples and examine under microscopes pond insects all helping them learn how important this welcoming little stream and waterfall area could be for them and for wildlife.



It is the unique and intriguing springs that will be in jeopardy if gravel mining is allowed on their aquifer. Surprisingly to some, Big Hill's springs are ranked in a 1984 Parks Canada survey of springs, conducted by S.J. Houseknecht, as being *"one of the top four mineral springs found in Canada,"* and yet, they have been poorly recognized or properly protected. This past year the province closed the park for a full year so work could be done to help protect the increasingly popular park and its unique and appealing water features and landscapes.

These mineral springs are truly unique in that they produce at the rate of 84 litres/second and maintain an almost constant flow and temperature throughout the year. And, over thousands of years, they have also deposited the mineral calcium onto vegetation and debris, forming an unusual rock called tufa. The tufa has built into a series of formations that the creek attractively tumbles over to the delight of visitors. These springs features are recognized as provincially and nationally significant. The springs also supply 50% of the flow in Big Hill Creek that enters the Bow River at Cochrane, bringing reliable amounts of high quality water. Such water is increasingly precious as the effects of climate change become more threatening.

The fact that the federal Department of Fisheries and Oceans have recognized the waters of Big Hill Creek around the Provincial Park and springs as critical habitat for threatened bull trout is also significant and indicates the absolute importance of maintaining the aquifer, springs, and the temperature and flow rates of water in the creek.

The park and natural landscapes in the vicinity, including the deeply incised meltwater coulee that leads downstream from the park to Cochrane, are recognized as ecologically significant in that this is one of the few existing areas protecting the Foothills-Parkland Subregion of Alberta. Today less than 2% of this subregion has any provincial protection; losing any of the protection currently afforded this natural region threatens our native biodiversity and the health of our environment. The province has made a commitment to protect 17% of our province, underrepresented natural regions like the one here need to be increased dramatically.

Equally important is the protection of connectivity. Because the park and surrounding lands remain in a relatively natural state, a wide range of wildlife is supported and allows movement through travel corridors to the Bow River Valley and Glenbow Ranch Provincial Park, as well as north to Dog Pound Creek, west to Horse Creek and beyond to Grand Valley and east through routes into the Nose Creek basin. Big Hill's valley functions as an oasis for species from the Grasslands, Parklands and Foothills ecological regions that includes an amazing blue heron colony known to be more than 100 years old and nest sites for peregrine and prairie falcons. Even sharp tail grouse leks are known in the vicinity. Other animals include moose, elk and two deer species, both black and grizzly bear and wolves have been seen in the valley in recent years. Cougar are regular residents, along with coyotes, foxes, mink, weasels, bob cats, porcupine, ground and red squirrels, garter snakes, and chorus frogs are abundant and leopard frogs are known. At least 126 species of plants are found in the area, not including mosses, fungi, lichens or liverworts, along with 132 species of birds.

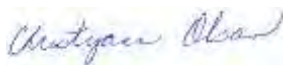
It is extremely important that the natural features of Big Hill's Valley, Park and Creek be maintained as lands surrounding it are increasingly developed. It is also critical to maintain the connecting corridors integral to the area that allow for the continued flow of biodiversity and recognizes the importance of a network of connected protected areas.

Because of the many unique and fragile features of Big Hill's ancient aquifer, its springs, the rare tufa formations and the array of ecological and wildlife values the area supports, AWA respectfully submits that it would be wise to increase protection for these values and help gravel developers move operations to other less sensitive sites.

Indeed, increasing the size of Big Hill Springs Park, as has long been requested both officially and by citizens, could provide a great service to those living in the area and far beyond. The site has the possibility of becoming a valuable interpretive park that would be an important tourist attraction with lasting economic value. A value that could well exceed that of a gravel operation.

AWA respectfully requests that the application to redesignate the land from Agricultural, General District to Direct Control District to facilitate aggregate operations be denied.

Sincerely
ALBERTA WILDERNESS ASSOCIATION



Christyann Olson
Executive Director



Gerald Bietz
President, Bighill Creek Preservation Society
Box 31, Site 13, RR #2
Cochrane, AB, T4C 1A2
August 21, 2020

Reeve Greg Boehlke
Rocky View Council
262075 Rocky View Point
Rocky View County
T4A 0X2

Dear Mr. Boehlke:

Regarding: Mountain Ash/ Summit Gravel Extraction Proposal and Risk to Big Hill Springs Provincial Park and Bighill Creek

Commented [1]:

Bighill Creek Preservation Society was registered as an Alberta Society in 2015. We are the stewards of the municipal lands within the Bighill Creek drainage. Our overarching objective is the preservation of the unique natural and historic attributes of entire Bighill Creek watershed. To this end we have worked to develop a Watershed Plan for the entire basin. We have raised funds and carried out studies of water and sediment quality, fish populations and habitat, riparian health, terrestrial and aquatic insects, and eDNA. We have installed continuous water temperature monitoring at 12 sites. In 2020, with the University of Calgary we commenced a broader evaluation of the numerous springs which support this regionally extraordinary habitat. Due to COVID restrictions, this work has been postponed.

Big Hill Springs Provincial Park, a significant regional asset is located in the Bighill Creek drainage. In 2019 it is estimated to have received 175,000 visitors. Due to over use the Park is currently under renovation.

Studies by the University of Calgary have determined that the source waters for the Park and about 50% of the flow into Bighill Creek emanate from an aquifer which extends generally north and west of the Park. The proposed mine would be located on the aquifer and immediately adjacent the main springs which sustain the Park. Mining would remove the protective over burden, exposing the aquifer to contamination. Breaching the aquifer would require dewatering the pit, thus diminishing flows to the Park and Creek, placing in jeopardy a much loved Park, a diverse ecological system and; as the Creek flows through Cochrane, a valuable recreational/ecological asset of the town.

Earlier, when this and two other open pit gravel mines were proposed, adjacent to each other just west and north of the springs and Park. BCPS registered its concerns with RVC Council. Now, BCPS asks that RVC reject any consideration of the Mountain Ash/Summit Pit proposal due to the significant risk of damage to the aquifer underlying these mines and therefore the viability of the Park and drainage. There is possibly no more environmentally sensitive development proposal in all of RVC. To put this artifact in jeopardy for common gravel would be a travesty. In our region, gravel is virtually everywhere. It can be sourced from a less sensitive place.

As more people move into RVC the demand for parks and recreation trails such as those associated with Big Hill Springs Park and our Creek will only increase. We ask that RVC consider equally the value of the springs, the Park and area recreation when it makes any decision regarding the Mountain Ash/Summit Pit proposal or the other proposed pits.

Yours sincerely,

Gerald Bietz,
President, Bighill Creek Preservation Society
cc RVC Councillors and Jessica Anderson, RVC Planner

Michelle Mitton

From: Prez BHCE <prez4bhce@gmail.com>
Sent: Tuesday, February 16, 2021 10:21 AM
To: Legislative Services Shared
Subject: [EXTERNAL] - Fwd: for submission

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

Dear Council;

Big Hill Creek Estates water coop is the water cooperative that services the 15 homes located in Big Hill Creek Estates and as such is an interested party in the above noted Application. We are concerned about the possibility of an aggregate operation on land adjacent to the well we manage.

As you are aware, the Water Act and Environmental Protection & Enhancement Act in Alberta prohibit the siltation and erosion and releases that may degrade water quality. We are not satisfied that the information provided by the applicant demonstrates the appropriate due diligence in determining that an aggregate operation would not degrade the water quality of a well on adjacent land. In fact, a comprehensive study out of Finland produced by the National Board of Waters and Environment (no such study could be found for Canada though the geological states are similar) states conclusively that an aggregate operation would degrade the water quality and we have reproduced the conclusion below:

Gravel extraction causes changes in seepwater and groundwater quality as well as in the elevation of the groundwater table and its variation. Acid rain flushes the soil, increasing the quantity of dissolved salts and seepwater and groundwater quality variations. The composition of water in groundwater ponds varies in the same way as that of surface water, seasonally. The great variations in the quality of pond water increase the variations in groundwater quality. Gravel extraction increases the pollution risk of groundwater and may cause difficulties in the treatment of the water abstracted from a groundwater intake.1

If you would like a complete copy of the study, we are happy to provide as this study has been reviewed by many municipalities in Canada contemplating aggregate extraction applications. Assuming that the groundwater in the vicinity of the aggregate operation will be negatively impacted, the well managed by Big Hill Creek Community Association will obviously be impacted. As we are only a water coop supplying 15 residences. our financial ability to manage a problem with our water supply are limited and without a good source of water our properties are worthless. To what degree can we hold the gravel pit operators responsible and what degree would RVC be responsible. Who would step up and help out our community. Would the gravel pit owners and/or RVC be prepared to put up a assurance bond payable to BHCE water coop in the event our water supply is contaminated. In Alberta a reportable fuel spill is anything 200l and above. to put this in perspective one l of gasoline can contaminate one million litres of water (Government of Canada n.d.)

there is the potential for this to occur. with the ground cover removed contaminants could easily contaminate our water supply and the Paskapoo aquifer from which many Albertans including our community draw our water.

RVC please remember this
You can live without food for three weeks
You can only live without water for three days
You can live without gravel forever

The bad news is water is running out ... water is our most valuable resource
the one thing humans CANNOT survive without and
its becoming harder and harder to find

Wall street has begun trading water as a commodity,like gold and oil. The first water market launched on the Chicago Mercantile exchange
and there were 1.1 billion in contracts tied to water prices in California

is gravel really the thing RVC really needs. Certainly the vast majority of the gravel
will be sent to final destinations outside of RVC so are you really helping the residents of RVC?

1

Future Groundwater Resources at Risk (Proceedings of the Helsinki Conference, June 1994) IAHS Pub. No 222, 1994

At no point in this notification process was Big Hill Creek Estates water coop approached by the applicant or anyone representing the applicant to discuss the application or the proposed project and any potential impacts to the well we manage. We feel this was an egregious oversight and does not demonstrate good faith in creating a positive working relationship going forward. The application should be denied.

Sincerely,

Big Hill Creek Estates Water Coop

Michelle Mitton

From: Ken Stevenson [REDACTED]
Sent: February 16, 2021 12:28 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Summit Pit concerns: Ken Stevenson
Attachments: Rocky View Council15 February 2021 -Trout work.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

Dear Rocky View Council,

I am attaching an email submission of a signed formal letter being sent to you today (15 February 2021) with regards to the Application PL 2020031 By-Law: C-8051-2020 for the Proposal by Mountain Ash Partnership for a Gravel Extraction on what is know as their SUMMIT PIT. The gravel removal is located on the surface above the known under-ground aquifer water source of the Bighill Springs Creek in the Bighill Springs Provincial Park.

Thank you for consideration of this letter.

Yours respectfully,

Ken Stevenson
Board Member: Bighill Creek Preservation Society
148- Gleneagles View
Cochrane T4C 1W1
[REDACTED]

Rocky View Council
262075 - Rocky View Point
ROCKY VIEW COUNTY
Alberta, T4A 0X2

15 February 2021

Bighill Creek Preservation Society
c/o 148 – Gleneagles View
COCHRANE, T4C 1W1
Alberta

Dear Rocky View Council,

Summit Mine-Mountain Ash Partnership
Application PL 2020031, By-Law C-8051-2020
Concern for Water Quality in Bighill Springs Creek

The Bighill Creek Preservation Society was formed in 2015 by local citizens as a non-profit Society. During the past five years this Society has completed and published quality environmental studies on the creek water and the watershed. These studies have been Phase I and Phase II of detailed water/sediment studies at six sites in the creek and at two springs – one being the Bighill Springs in the Provincial Park, Aquatic Insect studies at five sites along with an eDNA profile of the creek waters, Riparian studies at three sites within the watershed, Electro-fishing through Trout Unlimited – Calgary at three sites and, recently in 2020, using temperature loggers at eleven sites to obtain vital temperature profiles of the creek.

One of the future endeavours on the Bighill Creek Preservation Society is to work with the Federal Department of Fisheries and Oceans and our Alberta Environment – Fisheries Department to assess the spawning habitat of the creek and consider the re-introduction of native Westslope Cutthroat Trout and Bull Trout. Up to the 1960's, the creek waters from the Provincial Park to the confluence of the Bow River had good numbers of these native trout. Beavers have been, and are currently active, in the Reserve Lands (County of Rocky View), the St. Franciscan Retreat Lands and the Town of Cochrane.

The Bighill Springs Creek and watershed currently is classified as very environmentally intact and of high quality. These features are very much enjoyed by visitors to the Provincial Park and through walking trails in the Reserve, the Retreat and the Town of Cochrane.

The proposed Summit Mine is located on top of the known Aquifer of the Springs which arise within the Bighill Springs Provincial Park. This proposal must not be permitted due to the real risk of severely altering the Spring waters within the Provincial Park and downstream to the Bow River.

Yours sincerely,

Ken Stevenson, Board: Bighill Creek Preservation Society

Michelle Mitton

From: Blake Johnson [REDACTED]
Sent: Friday, January 29, 2021 11:24 AM
To: Legislative Services Shared
Subject: [EXTERNAL] - C8051-2020

Follow Up Flag: Follow up
Flag Status: Completed

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I Blake Johnson write in OPPOSITION, to the Mountain Ash Limited Partnership application for an open pit gravel mine. I frequent Big Hill Springs and Creek, and it is an area far too sensitive ecological. It is unacceptable that a an open pit gravel mine like this is even being considered as it is in such close proximity to a precious water resource and a provincial park, used by thousands every year. A large crater from a mine like this would cause a recharge of springs, there fore drastically reducing a protective layer that would eventually carry mining contaminates into Big Hill Creek.

Sent from my iPhone

Michelle Mitton

From: Charlene Gale [REDACTED]
Sent: February 17, 2021 2:17 PM
To: Legislative Services Shared
Cc: [REDACTED]; Division 9, Crystal Kissel
Subject: [EXTERNAL] - Bylaw C-8051-2020
Attachments: Summit Pit Feb 2021.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

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Letter in opposition to Bylaw C-8051-2020 to redesignate W 1/2 -31-26-03-W05M from Agricultural, General District to Direct Control District (DC) in order to facilitate an aggregate operation.

Sincerely,
Charlene Gale

Sent from [Mail](#) for Windows 10

Gale Force Ranch

270012 Range Road 40, Rocky View County, AB, CANADA T4C 3A2
403-932-5992

February 17, 2021

Rocky View County,
Legislative Services,
262075 Rocky View Point,
Rocky View County, AB
T4A 0X2

RE: Bylaw C-8051-2020, File: PL20200031 (06731002/4)

Hello, I am Charlene Gale, Gale Force Ranch. I live on SW ¼ Section 6, Twp 27, Range 3 West of the Fifth Meridian which is directly north of the proposed Aggregate Mine on W ½ Section 31, Twp 26, Range 3, West of the Fifth Meridian.

I oppose the proposed redesignation of W ½ 31-26-03-W05M from Agriculture, General District to Direct Control District to facilitate an aggregate operation.

My Father and Grandfather bought this quarter in the 1960's, my husband and I moved here in 1984, and the land was transferred into my name a few years ago.

When we moved here, Highway 567 was an oiled road, the speed limit was 80 km/hr, but you could not drive that fast without damaging your vehicle in the many potholes. Now that it is widened and paved, the speed limit is 100 km/hr but very few drivers go that slow. Highway 567 has become a popular bypass around the city of Calgary and the traffic is often nonstop in the daytime and there is traffic throughout the night as well.

In general, I believe a landowner has the right to use his or her land however they choose, if the impact on the neighboring community is not overly detrimental. Several years ago, the company making this application

came around asking people to support, or at least to not object to this proposed gravel pit. At that time, the pit now called Hillstone (formerly called Airth Pit and Big Hill Springs pit) on NW ¼ section 36, Twp 26, Range 3, West of the 5th Meridian, was smaller and the impact on my enjoyment and use of my property was tolerable. There was dust when the wind blew from the west, noise from trucks passing by or gravel crushing and occasionally gravel dropped on the road. At that time, I was more in favour of people being allowed to use their property as they saw fit than I was against gravel pits and did sign their petition.

Since then, Hillstone has grown and the impact is much greater. The Hillstone pit is ½ mile (800 meters) away from my house. In spite of the large trees around my yard and the big berms around the pit, the dust has become more than a minor nuisance, coating our property in a brown film and probably doing much the same to our lungs and those of our livestock.

The number of trucks passing our house was almost constant between 7:30 am and 5:30 pm, 5-6 days a week this summer. Some of those trucks have either been “enhanced” to make them louder, or the drivers do not know when to shift gears! A few are so consistently loud we can identify them from inside our house with the windows and doors closed.

My opinion of gravel pits near my home has changed and I no longer feel that gravel pits are good neighbours who take the health and well being of the nearby community as seriously as they should. I therefore withdraw my former support of gravel pits. I do realize that gravel is a necessity though and so I will not object to having one pit in my area at a time, although I do wish they were better neighbours.

The proposal for the Summit pit does not say how many trucks they expect to be coming and going from the pit on a daily basis, but 100% of those trucks will be leaving and entering the pit less than 300 feet (90 meters) from my house. They will be braking and gearing down, and then getting up to speed, both loaded going out and empty coming back in. The noise and dust from this traffic will be a huge impact on our lives.

Since Highway 567 is a Correction Line, the entry to the proposed pit, at Range Road 40 on the South side of 567 is only offset from Range Road 40 on the north side of 567 by about 600 feet (180 meters), meaning there will be two intersections very close together. This will make entering or leaving Highway 567 even more difficult and dangerous than it is now. How do they intend to deal with the noise, dust and danger at the entrance to the pit on Highway 567?

The company plans to create berms along highway 567. The elevation of my yard averages about 30 feet (10 meters) higher in elevation than NW $\frac{1}{4}$ 31 and more than twice that for the SW $\frac{1}{4}$ 31, so the berms will not make much difference from my house and yard. The berms at Hillstone are very large and yet we still get the dust and noise half a mile away. At one point, I was assured that the Summit pit would also build large berms and plant trees on them on my side of 567 to stop the noise and dust from entering my property. I do not see any mention of that in the current proposal.

My well is 132 feet (37.5 meters) deep and is an incredibly good well, lots of water, although high in minerals. We use it to water livestock as well as for household use. The proposal says they will not go closer than 1 meter to the water table. Since I am higher in elevation than the pit site (30-60 feet or 10-20 meters higher), by the time they remove the topsoil and overburden and begin removing the gravel, they may be near or below the level of my well. Can they assure me that their work will not impact my well? If it does impact the quality or quantity of my water, what do they propose to fix that?

Big Hill Springs Provincial Park is really an Alberta jewel and the impact of having such a large aggregate extraction mine so close to the headwaters of the creek is alarming. The beauty and the presence of historic and prehistoric artifacts in the Park needs to be protected so future generations can also enjoy them. The water flowing through the Park continues on and enters the Bow River. Will the silt and runoff from the pit be controlled, even in heavy rain and wet years so as to not affect the Spring and creek? The proposal says the mine will not go any closer than 800 meters (1/2 mile) from the Park. Hillstone Aggregate is 800 meters

(1/2 mile) from my house and we feel the effects of that pit, how do they think the Park will not be affected at the same distance?

Large equipment and trucks, even when very well maintained, do occasionally leak toxic fluids while working or parked. How is this company planning to deal with this so that the fluids do not end up in the water table or the Big Hill Springs creek?

Although I realize that we do need gravel and the income from such industries benefits Rocky View County and the residents of the County, it does sadden me to see so much agricultural land being redesignated and opening it up for development other than agricultural use. Not only is agriculture an essential service for everyone, but agricultural areas also allow indigenous wildlife to share the area and continue to be a part of this County. Pastureland supports the grasses and herbs that have been growing here for centuries. I read recently that there is a study now being conducted to measure the amount of atmospheric carbon grasslands remove and sequester. The reclamation of the site will not restore the contours of the land or the plants and wildlife that are there now.

In conclusion, I do not support the proposed Bylaw C-8051-2020 redesignating the West ½ of Section 31, Township 26, Range 3, West of the 5th Meridian from Agricultural General to Direct Control District in order to facilitate an aggregate operation. In the future, when the Hillstone Aggregate pit is finished and has been reclaimed, I might be willing to support a new pit in this area.

Respectfully yours,

Charlene Gale,
Gale Force Ranch
270012 Range Road 40,
Rocky View County, AB
T4C 2A3
CC: B & A Planning, Crystal Kissel

Michelle Mitton

From: CINDY MANN [REDACTED]
Sent: Wednesday, February 10, 2021 2:09 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C-8051-2020

Follow Up Flag: Follow up
Flag Status: Completed

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I don't know exactly where this pit will be, but rest assured that if it is within residential areas there will be push back. I live in Church Ranches and we are pulling our hair out over the Leigh High area. Honestly WTF? Where is the fairness to all of this? Surely these gravel pit people have known there is gravel there years before residential areas are allowed to be built. Why and Who is responsible for allowing this to happen? Why are residential areas allowed to be built where industrial plants are allowed. Surely there must be someone to hold responsible for this. This is extremely stressing to everyone involved. Quit allowing developers to develop residential communities in these industrial areas. This must be what is happening here!

It seems this is just a game!!!

As per Leigh High:

Key concerns with this application include:

- Serious risks to the aquifer that feeds Big Hill Springs and Creek – thereby threatening Big Hill Springs Provincial Park
 - The Park, which sees 250,000 visitors per year, is a unique ecological and recreational asset in west Rocky View.
 - It is also of cultural significance for the aboriginal community and of historic significance as the site of the area's first creamery and fish hatchery.
- Threatens wildlife habitat since it is in a well-used wildlife corridor featuring grizzly bears, moose, cougars, golden eagles, peregrine falcons – to name a few.
 - Big Hill Springs and Creek also provide fish habitat for endangered bull trout and is one of the only trout spawning locations in the region.
- Traffic safety issues on Hwy 567 from additional gravel trucks.
 - Hwy 567 is a narrow 2-lane highway with minimal shoulders. Combining that with its curving hills, there are many areas with restricted visibility – made far more dangerous as gravel truck traffic increases.
- This is Summit Pit's second application. It is to pre-designate the quarter section immediately south of its first application and is proposing an MSDP to cover both quarter sections.
 - Their initial application is currently part of the County's appeal of the successful court challenge of three gravel pits approved along Hwy 567 by the last council. Those pits were successfully challenged because they failed to adequately address cumulative impacts.
 - If the residents successfully defend against the County's appeal, the approvals of those three gravel pits will be thrown out, leaving this pit in the environmentally worst location of all those pits.
 - If the County wins its appeal – there will be four open pit gravel mines adjacent to the Provincial Park. This application expands Summit's original application.

While we fully acknowledge that our economy needs gravel, Rocky View has extremely generous aggregate reserves. As a result, it is not clear why gravel extraction should be permitted in such environmentally sensitive areas as the Summit Pit location.

Do we have to keep doing this???

Michelle Mitton

From: Cornell Wynnobel [REDACTED]
Sent: February 17, 2021 2:27 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C-8051-2020 PL202000031 (06731002/4)

Follow Up Flag: Follow up
Flag Status: Flagged

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We, Cornell and Muriel Wynnobel, 19 Big Hill Creek Estates, Rocky View County, vehemently oppose the above-noted bylaw to redesignate this property from Agricultural to allow for aggregate extraction. We oppose it on two fronts, the damage it will do to both our residential community and to the Big Hill Creek Provincial Park.

Although several of the issues are pertinent to both our residential area and the provincial park we will address them separately beginning with the park.

Of utmost importance is the probability of damage to the source of the spring water which is the reason the park was designated a provincial park in the first place. The aquifer which supplies the park's springs lies directly below the proposed sites for gravel extraction. Over centuries the land which protects the aquifer has developed to filter contaminants and maintain the water temperature which keeps the springs clean, flowing and at a fairly constant temperature. The removal of this protective layer of soil and gravel will destroy the filtration system and thus damage or indeed totally ruin the springs, the life blood of the park. The Paskapoo formation which is the same source as the Bears paw pit provides the water to our area. According to a peer review document submitted by Ailsa Le May, P. Geo on January 19, 2021, the science which the aggregate company submitted, the hydrogeological study put forth with it's proposal was unworthy of credit and reliance. RVC needs to commission a peer review of the hydrogeological study before even considering this application.

This park is a sanctuary for a multitude of types of wildlife, from fish and birds to small and large mammals. It is a source of food, shelter and water for these creatures. It is one of the rare spawning grounds for the endangered Bull Trout. Remove the constant source of water or contaminate it and the park will be rendered useless. The springs feed the Big Hill Creek which ultimately runs into the Bow River.

The county has expressed its opinion that recreation is of significant importance for the residents as evidenced by asking for feedback on what is needed and desired for recreational purposes. Walking trails have shown to be of ultimate importance. This park supplies unique and exquisite walking trails with the benefit of nature, a canopy of shade, fresh water and waterfalls and historic significance.

Covid 19 should have taught us the value of natural spaces to the physical and mental health of people. Why would we ruin an existing source of this type of recreation for more gravel which exists in a multitude of places in Rocky View? How would it enhance a person's physical and mental health to walk the trails to the sounds of heavy industrial equipment and toxic silica dust rather than fresh air and the calming sounds of nature?

The access to the park is from Highway 567. How dangerous will it be trying to enter the highway with a multitude of gravel trucks speeding along the highway. I would be surprised if any one of the residents or councillors has not experienced problems with gravel trucks: speed, lack of courtesy, spreading gravel onto the roads and sending gravel into windshields. The tarps required by law are not adequate to prevent the gravel from escaping and are often nothing but shredded rags covering mere fractions of the load in many cases. The proposing company states about 30 - 50

trucks a day for one pit. What about the cumulative effects of 4 to 6 pits. That equals at least 200 to 300 gravel trucks. How many trips does each gravel truck make a day? Highway 567 is a two-lane highway with no significant shoulders, large, steep hills and hidden intersections, a disaster waiting to happen.

Now, on to the residential community in which we live. The objectionable qualities of this proposal are physical and mental health risks posed by dust, noise, reduced property values, probability of water contamination and just plain worry about contamination or even the loss of water supply or value of property.

Silica dust is known to be carcinogenic and travels well beyond the gravel extraction sites. The most dangerous PM2.5 (2.5 micron) particles can travel over 14 km in a 20 km/hr wind and PM10 (10 micron) particles can travel 3.7 km in the same 20 km/hr. wind. Since the winds are most frequently from the north or the west and very often well above the 20 km/hr. range, both our residential area immediately south of the proposed gravel pit and the park immediately east of the pit would be subjected to this dangerous, toxic dust on a regular basis. As the Town of Cochrane develops further north, even the residents of Sunset Ridge would be exposed to the silica dust. An Alberta Occupational Health and Safety Bulletin states "exposure to crystalline silica can cause a number of health problems including silicosis, lung cancer, chronic obstructive pulmonary disease and emphysema, as well as pulmonary tuberculosis." If you live anywhere in Rocky View, you will have witnessed top soil, snow and even roofing flying through the air on numerous occasions. This risk of illness should be considered of extreme importance in approving the application.

The noise level of the existing aggregate extraction site is already evident in our community and it is considerably farther away than the proposed site. The operation of heavy equipment and constant movement of gravel trucks will be a constant source of annoyance and stress for all residents. This has proven to be harmful to both and physical and mental health. Given the location of the sites the sound will travel up to our area. It is even possible to hear concerts in Mitford Park from up here so how much more noise is generated by the gravel extraction process. Because we are significantly above the proposed extraction site no berm will reduce the noise level for our community nor will it block the view into the heavy industrial area, or moonscaped landscape which is presently a scenic and bucolic setting. It will remain an eyesore till long after the present residents have left or died.

The effects on our water supply is of huge concern. As mentioned above, gravel mines would remove the protective filter of the aquifer allowing contaminants to seep into the aquifer. With so much heavy industry and industrial equipment right above our aquifer, there is certainly a reasonable chance of affecting our well. Our only source of water is the common well the residents of Big Hill Creek Estates share. Any contamination or depletion of volume would leave us without the vital source of clean, potable water. This is the most valuable commodity of all to humans and animals.

Our property values will be very negatively affected. We, the residents, and prospective buyers purchase acreages to enjoy the peace and tranquility of rural life including the scenes from our windows and wildlife passing through. With heavy industry looming within our sight lines and the noise and dust, who would be motivated to buy in this location?

The cumulative effect of the proposed wells including the already functioning well needs to be taken into consideration in all aspects mentioned above: water contamination, dust, noise, traffic, etc. Each well individually has an impact, but taken together they pose a huge risk to the ability to enjoy our homes and lives.

The company claims to have taken residents' concerns into consideration, but we have not seen, nor heard a word from them.

The traffic Impact assessment submitted with the proposal did not take into account the steep grades, the narrow road, the varied users, including school buses, on Highway 567.

We believe that approval of this proposal would be a failure of the Council to carry out it's responsibility to Rocky View voters and residents. A full Area Structure Plan needs to be completed before any proposals of this nature are even

considered. Such a plan must take into its analysis data, reports and scrutiny from independent experts not supported by applicants with vested interests. To not utilize independent sources would be negligent on council's part.

The pros and cons: Many significant cons have been listed above. The pros seem to be few and only benefit B & A Planning Group as there are already plenty of other gravel sources.

Do you as a council wish your legacy to be the destruction of a natural jewel, the Big Hill Springs Park and the waters it contains or the death or injury of a schoolbus load of children. When a gravel truck collides with a school bus, it will be death.

Please take these concerns carefully into consideration when you make a decision on the proposed gravel extraction operations.

Respectfully,

Cornell and Muriel Wynnobel

Michelle Mitton

From: Brooke Kapeller <bkapeller@cpaws.org>
Sent: February 17, 2021 2:06 PM
To: Legislative Services Shared
Cc: Katie Morrison
Subject: [EXTERNAL] - Bylaw C-8051-2020, PL 20200031, Application by Mt. Ash LP to Redesignate Land from Agricultural to Industrial
Attachments: RVC_Bylaw C-8051-2020_CPAWS_17Feb2021.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

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Hi there,

Please find the attached letter from CPAWS Southern Alberta regarding Bylaw C-8051-2020, to be heard on 2 March 2021.

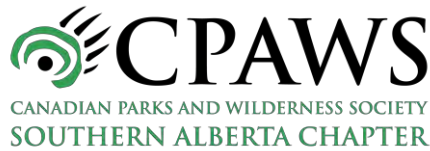
Thanks,

--

Brooke Kapeller (she/her/hers)
Conservation Program Coordinator
CPAWS Southern Alberta
bkapeller@cpaws.org
403-232-6686

Advocating for Southern Alberta's parks and wild spaces since 1967. Help us fight for nature by [donating today!](#)

CPAWS Southern Alberta acknowledges that they work in the traditional territories of the Siksikaitsitapi (Blackfoot Confederacy), comprised of the Siksika, Kainai, Piikani, and Amskapi Piikani First Nations; the Tsuut'ina First Nation; the Stoney Nakoda, including the Chiniki, Bearspaw, and Wesley First Nations; the Ktunaxa Nation; and the Métis Nation of Alberta. Today, southern Alberta is home to Indigenous people from all over North America.



CPAWS Southern Alberta
88 Canada Olympic Way SW
Calgary, AB, T3B 5R5
Phone: (403) 232-6686

17 February 2021

Legislative Services, Rocky View County
legislativeservices@rockyview.ca
Rocky View County Hall
262075 Rocky View Point,
Rocky View County, AB, T4A 0X2

RE: Bylaw C-8051-2020, PL 20200031, Application by Mt. Ash LP to Redesignate Land from Agricultural to Industrial

To whom it may concern,

I am writing you today on behalf of the Canadian Parks and Wilderness Society, Southern Alberta Chapter (CPAWS). We appreciate the opportunity to provide input into the re-designation of land under the Rocky View Land Use Bylaw C-8051-2020 to allow for industrial gravel mining. CPAWS does not support this re-designation for the reasons outlined below.

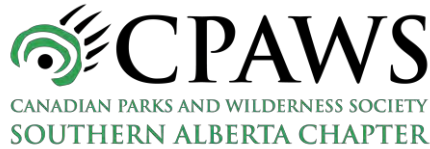
For over 50 years CPAWS Southern Alberta has worked with governments, communities, recreation groups and conservation partners to improve our provincial park system, so that it prioritizes nature and protects a diversity of ecosystems. We advocate for creating and managing parks that preserve critical wildlife habitat and the movement corridors that link them, while maintaining the important ecosystem services, such as water, and ensuring quality outdoor experiences for Albertans.

As you know, the proposed site of this gravel pit is directly upstream and adjacent to Big Hill Springs Provincial Park, one of Alberta's first Provincial Parks. Industrial activity associated with gravel mining is extremely disruptive to both people and the ecological system. A large gravel pit adjacent to the Park will significantly hinder Albertans' use and enjoyment of this Park. Albertans have made it clear in the last year that they love Alberta's Parks. In the midst of the COVID-19 pandemic, Albertans flocked to these places, and when they were put at risk, Albertans stood up for our Parks. This situation is no different. The application to re-designate land to allow for an industrial development of this scale is simply unacceptable.

Gravel mining is extremely disruptive to the ecosystem, and this proposed project would be particularly disruptive. It is located on the Big Hill Springs aquifer, posing significant risk for groundwater contamination and downstream water quality^{1,2}. The area that the project and the Big Hill Springs Provincial Park are located within is also important for wildlife movement and connectivity in the area. Industrial disturbances such as gravel extraction have been found to impact wildlife movements in

¹ Hatva, Tuomo. "Effect of gravel extraction on groundwater." IAHS Publications-Series of Proceedings and Reports-Intern Assoc Hydrological Sciences 222 (1994): 427-434.

² Bayram, Adem, and Hızır Önsöy. "Sand and gravel mining impact on the surface water quality: a case study from the city of Tirebolu (Giresun Province, NE Turkey)." Environmental earth sciences 73.5 (2015): 1997-2011.



CPAWS Southern Alberta
88 Canada Olympic Way SW
Calgary, AB, T3B 5R5
Phone: (403) 232-6686

different contexts; impacts such as noise³, reduction in water quality, and loss of wildlife habitat are likely to affect both terrestrial and aquatic wildlife connectivity and use of the area. Finally, this area is in close proximity to federally designated Critical Habitat for Westslope Cutthroat Trout and areas in which Critical Habitat for Bull Trout may be found⁴. The region may well have at-risk native trout present.

Given the social and ecological value of this area, directly adjacent and upstream from a Provincial Park, in an ecologically sensitive area, is not the place for such industrial development. A full cumulative effects assessment of the region needs to be undertaken before any additional industrial proposals are considered.

Thank you for your consideration.

Sincerely,

Katie Morrison, M.E.Des., P.Biol.
Conservation Director
CPAWS Southern Alberta

³ Kunc, Hansjoerg P., et al. "Anthropogenic noise affects behavior across sensory modalities." *The American Naturalist* 184.4 (2014): E93-E100.

⁴ DFO Aquatic Species at Risk Map: <https://www.dfo-mpo.gc.ca/species-especes/sara-lep/map-carte/index-eng.html>

Michelle Mitton

From: Dale Seidlitz [REDACTED]
Sent: Sunday, February 7, 2021 10:11 AM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C8051-2020 Summit Pit

Follow Up Flag: Follow up
Flag Status: Completed

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Good Day

We wish to communicate our opposition to the development of the Summit Pit proposed by Mountain Ash Limited Partnership, Bylaw C8051-2020.

The Big Hill Springs Provincial Park is a very unique feature in this area and it is essential that it be protected for future generations to enjoy. Proposing new gravel operations in the watershed for the creek running through this park, or in such close proximity to this park, should not even be considered. Regardless of regulations that are put in place by the government or the monitoring efforts that are implemented, if the gravel operation does negatively impact the park, the damage cannot be undone. While we understand that the gravel beds that make a water shed what it is are attractive for mining, they do have a far greater value to our society by remaining what they are, a source of clean uncontaminated water. We should not squander this resource for the benefit of the owners of a gravel pit.

Much is currently being proposed by governments of all levels and by the citizens they represent to preserve our land, air and water and to limit the impact of climate change. Let's do our part in Rocky View County to keep the good environment that we have.

Respectfully submitted
Dale and Sandra Seidlitz
69 Green Valley Estates
Rocky View County, AB T4C 2X9
[REDACTED]

Michelle Mitton

From: [REDACTED]
Sent: February 17, 2021 8:28 AM
To: Legislative Services Shared
Subject: [EXTERNAL] - Fwd: Bylaw C-8051-2020 - OPPOSED
Attachments: Summit Pit Opposition.docx

Follow Up Flag: Follow up
Flag Status: Flagged

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Rocky View Council,

In response to the Notice of Public Hearing regarding application number PL202000031 (06731002/4), our household is **OPPOSED**.

Please find attached a letter outlining the reasons for our opposition to the above noted Bylaw for inclusion in the agenda package for the Public Hearing.

Thank you for your time and consideration,

Dale, Allison and Kathryn Palmer

43 Big Hill Creek Estates

Rocky View County, T4C 2X6

To: legislativeservices@rockyview.ca

Subject: BYLAW C-8051-2020File: PL20200031 (06731002/4)

We, Dale, Allison and Kathryn Palmer of 43 Big Hill Creek Estates, Rockyview County, are in strong opposition to the consideration of BylawC-8051-2020 to redesignate NW/SW-31-26-03-W05M from Agricultural, General District to Direct Control District (DC) in order to facilitate an aggregate operation.

We are in opposition based on the following:

1. Lack of Area Structure Plan

- a. There are a variety of stakeholders in the area – residential, commercial, industrial, and a valuable Provincial Park
- b. An over-arching framework is needed to shape future development of this growing area and provide clarity and certainty to stakeholders when making investment decisions.
- c. With aggregate operations, there are many projects in the area operating or under consideration. An effective ASP would shape the approval process for these operations providing more certainty to both residents and extraction companies.
- d. There is a unique Provincial Park in the area that could be greatly affected by further extraction activities and an ASP would ensure that the area be protected.

2. Lack of Consultation

- a. The applicant determined that direct consultation would include properties within a 1.6km radius. This is bordering our community of 15 property owners who have a definite stake in the approval of this operation.
- b. The applicant has committed to the guidelines of the Big Hill Springs Aggregate Producers Group. That Group has a Joint Communication Plan of consulting and partnering with residents within a 1.5-mile radius. Why was this distance not followed in the consultation?
- c. The county was contacted about the cancellation of the initial date of the hearing and we were assured that we would be notified of the revised date. No notification was passed on leaving residents with very little time to express their opinions on the application.

3. Proximity to Residential Neighbourhoods

- a. It is a known fact that proximity to gravel extraction sites has an adverse effect on property values. While it is said that those values return to normal once extraction is complete and remediation is in place, this pit has a 40+ year lifespan. It is unacceptable that residents face these reduced property values, especially when the area around was zoned Agricultural – it's what we expected when we purchased our properties – not noisy, industrial activity that is accompanied by health risks.
- b. Fine dust particulate is a proven health risk. Our properties are within 1600m of the proposed operations and it has been shown that hazardous concentrations of fine particulate can travel within this range and beyond. The most dangerous PM_{2.5} (2.5micron) particles can travel over 14km in a 20km/h wind. PM₁₀(10 micron) particles can travel 3.7km in the same 20km/h wind.
- c. Noise pollution is a fact with aggregate extraction. While berms can mitigate this to some extent, the elevation difference between the proposed operation and our residences will likely render these ineffective. This will be a 6 day a week operation (no crushing on Saturdays but other operations will continue). The applicant states that sound levels will be below 65 decibels at the property line but at our location this will still be audible and disrupt the enjoyment of the peace and quiet that we purchased our properties for. Sounds like backup alarms from equipment will carry for significant distance.
- d. Potential contamination of groundwater would be disastrous. The extraction plan calls for excavation to within one metre of the water table. At this depth there is little to no protection of the aquifer from contaminants such as chemical runoff or hazardous spills. While monitoring is required, once a problem is detected irreparable damage is already done. A very large number of residences rely water from this aquifer and any reduction in water quality would have far reaching effects. Once the water is affected, it's permanent and will render our properties valueless and uninhabitable without unacceptable costs in re-sourcing our water.

4. Proximity to Big Hill Springs Provincial Park

- a. Big Hill Springs and Big Hill Creek are a valuable resource to the area. The pit is located within the watershed and aquifer that feeds the spring and creek.
 - b. The spring is unique in that the water flow and temperature remain nearly constant. With gravel extraction to within one metre of ground water this could greatly affect these conditions.
 - c. Unique and fragile mineral deposits have accumulated at the spring over thousands of years. Removal of the protective layers of soil and aggregate in the area will have an affect on water chemistry and can upset this delicate balance.
 - d. There is a vast diversity of wildlife in the area of the park and development will have a negative affect on habitat and movement in the area.
 - e. There are currently eight quarter sections of land in the immediate vicinity of the park that are owned by aggregate extraction companies. The cumulative effects of all of these operations have not been adequately considered. While these pits may be presented as having a reduced impact on the area individually, the collective result is significantly worse (noise/dust/traffic/implications on water and the protected environment). It is not possible to have intensive gravel operations in this area without resulting in negative affects on the park and spring.
 - f. The extraction site is within 850m of the park. There will be noise and dust pollution at the park. Rather than listening to the sounds of nature as people experience the park, they will hear the sounds of rock crushing and industrial equipment. Rather than breathing the fresh air, their lungs will be subjected to the dust contaminates from the pit. It would be impossible for there to be no negative impact to the wildlife and flora in the area. This was designated a provincial park for a reason and over a quarter million people visit it each year. Approving these gravel pits will render this park undesirable and a danger to the animals and plants that rely on the ecosystem.
5. Traffic
- a. It is anticipated that there will be 50 loaded trucks leaving the operation daily – this equates to 100 trips (loaded and unloaded)

entering and exiting the facility on HWY 567. This road is inadequate in its acceleration and deceleration lanes as well as the lack of passing lanes on the large hills. This traffic, combined with the truck traffic from existing pits is excessive on this road without major improvements and will cause congestive and potentially dangerous conditions. Further to the earlier point about the cumulative effect of multiple extraction operations in this area, this problem will be exacerbated as time goes on and approval of this rezoning sets a precedent for future operation as well.

The Summit Pit applicant isn't the only aggregate extraction operation up for consideration in the area. It is imperative that all of these proposed operations be considered on a consolidated basis regarding the noise/dust/traffic/impact on the environment and Provincial Park and on the water table. The cumulative impacts of the consolidated operation must be evaluated. It would be irresponsible to only evaluate each pit individually, when they will clearly eventually be one huge operation, regardless whether they are owned and operated by different companies. Once one is approved individually, precedent is set and others will surely be approved on similar basis. This will be disastrous for our neighbourhood.

Respectfully,

Dale, Allison and Kathryn Palmer

Michelle Mitton

From: Dan Brown [REDACTED]
Sent: Monday, February 15, 2021 11:18 AM
To: Legislative Services Shared
Subject: [EXTERNAL] - RE: Bylaw C-8051-2020
Attachments: Mountain Ash Gravel Pit Letter Feb. 2021.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

Dear Sir/Madam,

Please see attached my comments on the Mountain Ash Summit Pit proposal being considered under Bylaw C-8051-2000.

Kindly include these concerns and recommendations in your consideration of this proposal.

Sincerely,

D.R. Brown, B.Sc. (Geology), M.Sc.(Geology and Hydrology)
[REDACTED]

Sent from [Mail](#) for Windows 10

County of Rocky View Legislative Services
Rocky View County,
262075 Rocky View Point,
Rocky View County, AB, T4A 0X2

Feb. 15, 2021

Dear Sir/Madam,

Re: BYLAW C-8051-2020

I am a hydrogeologist, a resident of Cochrane and a member of the Big Hill Creek Preservation Society. Over the last 20 years, my wife and I have hiked many times along Big Hill Creek and at Big Hill Springs. As a practicing hydrogeologist for over 40 years, working with both a large consulting engineering firm and a provincial environmental regulator, I have great respect for Big Hill Springs Provincial Park and the importance of a feature like the Springs. It is both an important source of water in the area and a valuable natural teaching resource for our youth and adults alike. I have worked both in physical hydrogeology, evaluating and developing groundwater resources in both Eastern and Western Canada, and in contaminant hydrogeology, investigating and restoring instances of groundwater contamination and developing groundwater management and protection plans for critical groundwater supplies.

Based on my appreciation and respect for the importance of Big Hill Springs, I recognized the potential for significant impacts from the proposed nearby Mountain Ash Summit gravel pit and, as a result, I have carefully reviewed the following documents:

- Hydrogeological Assessment Report
Mountain Ash Limited Partnership Aggregate Operation
NW and SW 31-26-03 W5M, Rocky View County, Alberta
SLR global environmental solutions
January, 2020
- The Summit Pit Project Website
<https://www.summitpit.com/>

The Executive Summary of the SLR hydrogeological report states:

"Under the current excavation scheme the overall risk of any significant negative impacts on water resources as a result of the development are negligible. This is based on the fact that the aggregate resource will not be mined into the water table and therefore no anticipated changes are possible to the groundwater regime."
(underlining mine)

The above summary statement is grossly misleading in my opinion. As even the SLR authors and the project web site indicate themselves:

- There are significant risks of direct groundwater impacts from manmade contaminants such as fuels, solvents (and dust suppressant chemicals) to be stored and handled daily on the site;
- Potentially contaminated stormwater collected from within the pits will be discharged directly from the operation to on-site groundwater infiltration pits; and
- The creation of a hydraulic sink at each of the phased pits, together with other nearby gravel pits, have the potential to significantly increase groundwater flow to Big Hill Springs by up to 10 percent on an annual average.

These potential impacts put great emphasis on **the importance of a detailed operation plan** for the pit that includes enforceable details of how and where hazardous materials would be stored and handled on the site. In my opinion, The Alberta *Code of Practice for Pits* is too general for this type of operation. The report does say that fuel storage would take place in a clay till covered area, but with no operations plan, one can't confirm the suitability of such placement. Does clay till, for example, include the completed pit areas that will be covered with some of the excavated till overburden? In addition, will ongoing re-fueling operations take place in the 5m thick till area, or directly within the pit at the excavation face where the equipment is operating?

With respect to the capture of stormwater runoff from the site and its discharge directly into the gravel aquifer, this raises a similar water quality concern and also puts an emphasis on **the importance of detailed water quality monitoring both before discharge, and in the down-gradient groundwater** (although that may be too late).

Finally, as noted above and in the SLR report, there is a **potential impact on Big Hill Springs and Big Hill Creek from a cumulative increase in flow** (up to 10% as calculated by SLR). The calculation was based on annual average flow, but did not consider short term impacts following heavy periods of rainfall and/or snowmelt? Is there a significant chance of increased flooding downstream?

In conclusion, recognizing the potential for both groundwater quality and groundwater quality impacts from the proposed Mountain Ash pit puts much more emphasis on **the importance of an assessment of the cumulative effects of the four planned gravel pits**. If the County of Rocky View has ignored this need, it is a serious dereliction of responsibility in my opinion.

I appreciate the opportunity to provide input to this process as a neighbour, a frequent recreational user of the Big Hill Springs Provincial Park and Big Hill Creek area, and a member of Big Hill Creek Preservation Society. I would be happy to discuss these concerns in more detail, should you wish.



D.R. Brown, B.Sc. (Geology), M.Sc. (Geology and Hydrology)
#114-1000 Glenhaven Way, Cochrane, AB T4C 1Y9

CC: Big Hill Creek Preservation Society
Attention: G. Bietz, President

Michelle Mitton

From: Darrin Durda [REDACTED]
Sent: Tuesday, February 16, 2021 8:55 AM
To: Legislative Services Shared
Cc: Division 8, Samanntha Wright
Subject: [EXTERNAL] - Bylaw C-8051-2020. Objection

Follow Up Flag: Follow up
Flag Status: Flagged

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Hello Administration / Council I am writing to you today to express our objection to this gravel pit application. Some of the reasons we are against it are as follows:

Very concerned about the cumulative effects of increased heavy traffic on these roads. In particular these heavy haulers are taking shortcuts through Bears paw in particular on Bears paw road. This is of deep concern as our family lives along this road. These roads are not meant for sustained heavy traffic. A good number of these haulers are speeding and cannot react in time to avoid bicycles, children, cars entering the roadway and the occasional dog. I have witnessed a number of near misses over the years. There have been a number of serious accidents with these haulers rolling over and failing to stop.

The roads in Bears paw and this end of the county were never engineered or built to support this kind of traffic. We just spent millions of dollars to rehab Bears paw road and we can all see the problems that happen to the pavement in a short period of time. The net benefit to the county is no where near enough to repair these roads.

The intersections and approaches to these pits need to be re-developed to accommodate this heavy traffic. Who is going to pay for that ? There needs to be road bans on these county roads to force the heavy haulers onto provincial roadways.

We ae also quite concerned with the increased concentration and cumulative effects of yet another gravel pit on Big Hill Springs Provincial park, we need to protect these resources.

Sincerely,

Darrin Durda
31 Big Sky close

Michelle Mitton

From: Errol B [REDACTED]
Sent: February 17, 2021 8:38 AM
To: Legislative Services Shared; edmonton.goldbar@assembly.ab.ca
<edmonton.goldbar@assembly.ab.ca>
Subject: [EXTERNAL] - Mountain Ash Application PL 20200031

Follow Up Flag: Follow up
Flag Status: Flagged

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To whom it may concern,

As an Albertan, I am passionate about job creation. I care deeply about our fiscal well being. I'm also very aware that fresh water is painfully finite. As we look towards a future, we need to balance mining with adequate protection of fresh water. I would encourage you to consider this in your analysis. I would also beg you to consider the needs of the people who are dependent upon freshwater

If you would like to discuss more fulsomely, please don't hesitate to reach out.

Errol Barrie
Life long Albertan

Jessica Anderson

From: Michelle Mitton
Sent: August 10, 2020 11:09 AM
To: Jessica Anderson; Oksana Newmen
Cc: Sean MacLean; Legislative Services Shared
Subject: FW: [EXTERNAL] - Gravel Pit Developments

Follow Up Flag: Follow up
Flag Status: Completed

MICHELLE MITTON, M.Sc

Legislative Coordinator | Municipal Clerk's Office

ROCKY VIEW COUNTY

262075 Rocky View Point | Rocky View County | AB | T4A 0X2

Phone: 403-520- 1290 |

MMitton@rockyview.ca | www.rockyview.ca

This e-mail, including any attachments, may contain information that is privileged and confidential. If you are not the intended recipient, any dissemination, distribution or copying of this information is prohibited and unlawful. If you received this communication in error, please reply immediately to let me know and then delete this e-mail. Thank you.

From: Foss, Tom [REDACTED]
Sent: August 10, 2020 10:37 AM
To: Legislative Services Shared <LegislativeServices@rockyview.ca>; Division 1, Mark Kamachi <MKamachi@rockyview.ca>; Division 2, Kim McKylor <KMckylor@rockyview.ca>; Division 3, Kevin Hanson <Kevin.Hanson@rockyview.ca>; Division 4, Al Schule <ASchule@rockyview.ca>; Division 5, Jerry Gautreau <JGautreau@rockyview.ca>; Division 6, Greg Boehlke <GBoehlke@rockyview.ca>; Division 7, Daniel Henn <DHenn@rockyview.ca>; Division 8, Samantha Wright <SWright@rockyview.ca>; Division 9, Crystal Kissel <CKissel@rockyview.ca>
Cc: Rocky View Gravel Watch <rockyviewgravelwatch@gmail.com>; [REDACTED]; Harry [REDACTED]; Linda Kostecky [REDACTED]
Subject: [EXTERNAL] - Gravel Pit Developments

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Attention Councilors and Administration

I wanted to follow up with this email so that no one takes any silence or the lack of being able to attend meetings, open houses etc., as support for current or future gravel pit applications. Our quarter section is in the middle of this gravel zone and I have been approached several times to have this property mined. I do not think this is a good idea nor appropriate at this time. In the past I have written and spoken to council to express my opposition and everyone is aware of the long length of reasons why allowing new gravel pit applications is a terrible idea.

Simply put, your team is doing a great job keeping a lid on taxes, developing business and growth at a very measured and careful and safe pace. There is no shortage of gravel, there is less demand and with COVID even less. Finish with the current pits and then consider the wisdom of opening new ones as needed. This is the only way residents will ever stomach these developments.

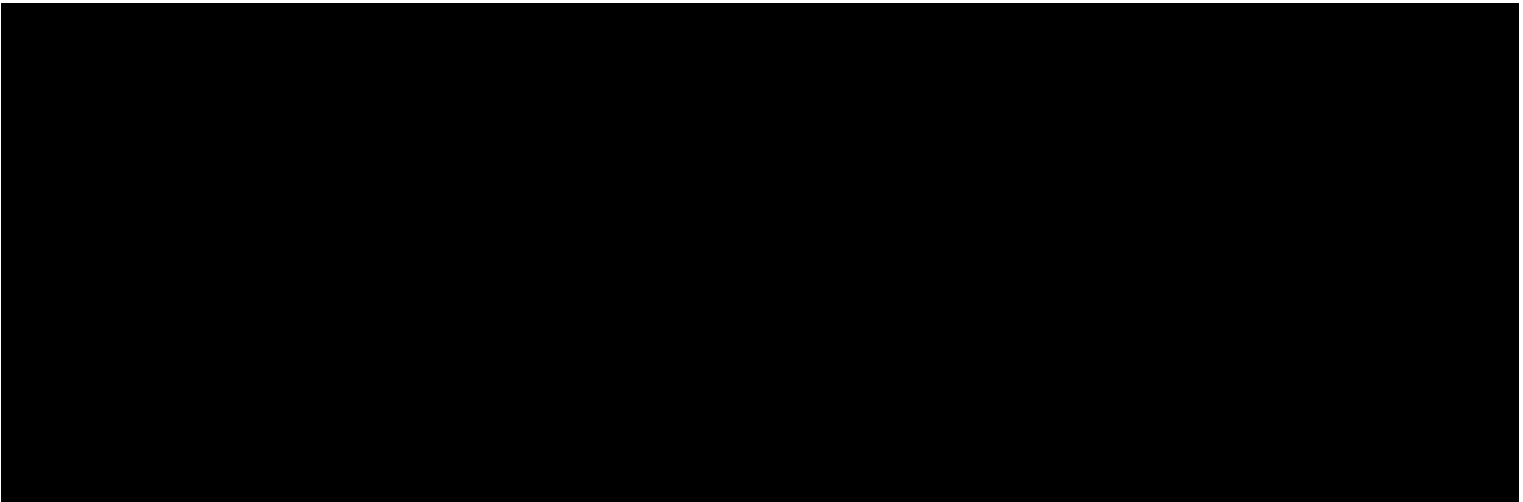
I hope you all stay safe and please register my opposition to additional, future, current or potential gravel pit applications unless those in operation have found the end to their life and have been safely reclaimed and returned to an environmentally sound state.

Traffic grows on highway 567 and just west of the road into the Bill Hill Springs was a record number of deer and moose and coyotes killed this past year. I know as I find their carcasses on our land. Two weeks ago there was a near fatal crash on RR #35 and Highway 567 and this was turning into a road that sees at best a handful of trucks each day. The danger of allowing a gravel pit down RR #35, even with the upgrade of an intersection as required by Alberta Transportation would make this a further death zone. Traffic grows impatient as they climb the big hill and routinely slingshot into the south lane in attempt to dangerously pass. If you wish to approve gravel pits in this area, at the very least is should come with taking the hills out of Highway 567 and setting up adequate intersections and perhaps even traffic lights. Maybe the gravel pit companies would be happy to upgrade those highways and pay their fair share to the costs the residents pay when a pit is approved in close proximity to their homes.

Also, I stand opposed to the current Summit Pit Application as the cumulative effect of all these pits has not been adequately studied by Rocky View, the Alberta Government and their Health Services department.

Thanks for your time and attention to this matter. As always feel free to reach out to me should you have any further questions.

Tom



Michelle Mitton

From: Garrett L [REDACTED]
Sent: February 17, 2021 1:05 AM
To: Legislative Services Shared
Subject: [EXTERNAL] - NO TO MINES

Follow Up Flag: Follow up
Flag Status: Flagged

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Please do not let another company ruin our ecologically sensitive areas near Bighill Springs. Use the area to promote healthy environmental responsibility and protection. Run a trail from Bighill Springs to Cochrane along the Ranche RD route.

Thanks

Garrett Leggott

Michelle Mitton

From: Gary Walsh [REDACTED]
Sent: Saturday, February 6, 2021 9:07 AM
To: Legislative Services Shared
Cc: Crystal Kissel; Gary J Walsh; Division 9, Crystal Kissel
Subject: [EXTERNAL] - Bylaw C8051-2020 - Gravel Pit - Big Hills

Follow Up Flag: Follow up
Flag Status: Completed

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To whom it may Concern:

As a resident of Rocky View County that resides in the Monterra Development at Cochrane Lakes, I "STRONGLY DISAPPROVE" on the expansion or development of another gravel bit in this area.

The noise, pollution, environmental impact is too great to permit this development. Beyond the Monterra Development, the Cochrane North Development and other rural residents would be greatly impacted.

As someone who drives Secondary Rd 567, the current gravel pit in this area impacts this signal lane, no shoulder road and in the last 12 months I have windshield damages from gravel trucks that race in and out to get their next load.

Beyond the environmental , noise, air pollution, the current pit shouldn't even be re-licence thus creating another pit would negatively impact this area.

Gravel pits should never be within area's where this is current and future residential developments, which this area is with 2-3 Kms of.

This is is my total opposition of permitting this gravel pit and I strong oppose bylaw C8051-2020

Regards,

Ratepayer

Gary & Carol Walsh
38 Monterra Link
Rocky View County, AB

T4C- 0G7
[REDACTED]

264130 Range Road 41
Rocky View County AB T4C 2X5

Rocky View County

Dear Rocky View County,

Bylaw C8051-2020
Application Number PL 202000031 (06731002/4

We want it to be aware that the drainage from this location flows into the head water of Big Hill Creek , Big Hill Provincial Park and to the Bow River.

At this time highway 567 cannot handle any extra heavy traffic.

We are adjacent land owners of this property and depend on water for our ranching operation.

Ian & Donna Airth

Michelle Mitton

From: Jacquelyn Gray [REDACTED]
Sent: Monday, February 15, 2021 8:24 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C8051-2020

Follow Up Flag: Follow up
Flag Status: Flagged

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Re Gravel Pit

I am sure you don't need all the reasons why We are against this pit & bylaw

However, please mark our family as dead set against this proposal and any future pits in the vicinity of Blg Hills
SPring Park

Thanks, J Gray

Michelle Mitton

From: Jacquie Brezovski [REDACTED]
Sent: Tuesday, February 9, 2021 2:07 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C-8051-2020

Follow Up Flag: Follow up
Flag Status: Completed

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Dear Council,

I am opposed to the Summit Pit Application.

I am concerned with the Summit Pit Application and its proximity to Big Hill Springs Provincial Park and the increased traffic on Hwy 567.

Big Hill Springs Provincial Park is a precious ecosystem that is of environmental and historical value. According to Mountain Ash's map of wetlands, there are many natural wetlands located on their proposed Summit Pit site. I understand that Mountain Ash Limited Partnership plans to remove the majority of these wetlands and replace them with drainage ponds. These wetlands serve the purpose of filtration for the groundwater that in time drains to Big Hill Springs Creek. Mountain Ash's proposed drainage ponds are insufficient environmental compensation for the destruction of the wetlands. I own 40 acres with a wetland and I would not be arrogant enough to believe if I destroyed it, I could have an even better system with a manmade construct. I believe Alberta Environment and Protection would agree since they charged a neighbour \$10,000 for digging into a wetland for irrigation purposes. Why then would a company be allowed to do that?

Not only will wetlands be destroyed close to an environmentally sensitive park but the mining process adds increased quantities of metals, herbicides and machinery fluids. Increased toxins plus the destruction of the wetlands filtration (even with manmade alternates) leads to an increased risk of watershed and environmental contamination. Environmental contamination is often not noticed until remediation is difficult and bodies of waters are so contaminated that people and animals become ill. As has been seen historically, companies who cause this type of contamination deny all culpability and who suffers are the people, the animals and the environment.

This is not an appropriate area for a gravel pit as it is too close to an environmentally sensitive area that is used by thousands of people a year and home to a rich diversity of wildlife and plant species. They also should NOT be allowed to destroy wetlands. Their replacement with drainage ponds while adding contaminants shows a disregard for this area.

The other significant concern is the increase in traffic. Hwy 567 is a single lane 2 way road with a small shoulder and no median. There is already a gravel pit close by which has increased the traffic on this road. According to the Mountain Ash application, 90% of their traffic will be going east. This road direction has multiple blind spot areas, huge hills and curves and is inappropriate for this heavy amount of traffic. According to the draft Rocky View County MDP, transportation is a consideration for these economic projects. This road was NOT made to accommodate so much large truck traffic especially when it is also a heavily used route for residential county traffic and school buses.

I am strongly opposed to the Summit Pit application by Mountain Ash Limited Partnerships and strongly encourage council to reject this proposal.

Thank you for your consideration.

Sincerely,
Jacquie Brezovski
272188 Range Road 42
Rocky View County, Ab
T4C3A4

Michelle Mitton

From: James Schmitt [REDACTED]
Sent: Tuesday, February 16, 2021 11:18 AM
To: Legislative Services Shared
Subject: [EXTERNAL] - BYLAW C-8051-2020

Follow Up Flag: Follow up
Flag Status: Flagged

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To: The Municipal Clerk's Office
Re: BYLAW
From: James and Jill Schmitt
35 Big Hill Creek Estates, Rocky View County, AB T4C2X6

Purpose: To **OPPOSE** BYLAW C-8051-2020
Application Number: PL202000031 (06731002/4)

Reasoning: As long-time members of Big Hill Creek Estates, we object to BYLAW C-8051-2020, which is the application by B & A Planning Group on behalf of 1410266 Alberta Ltd.. This is on the property of NW/SW-31-26-03-W05M, and commonly known as the Summit Gravel Pit.

Our reasons for opposing this is as follows:

1. This gravel pit will cause negative environmental impacts to our water system, wetland habitats and wildlife survival. Along with this it will negatively impact the Big Hill provincial park in these same ways, which neighbors our community
2. The gravel pit will cause negative health impacts from the dust containing silica. This by product is known to cause irreparable pulmonary issues such as COPD and asthma. It is my view that the County of Rocky View will be liable should BYLAW C-8051-2020 be approved.
3. This gravel pit is not necessary as not all gravel will be for the residents of Rocky View County.
4. The gravel pit is counter productive to the intended residential plan set forth for the Big Hill Creek Estates area as a RESIDENTIAL community.
5. The huge negative impacts of this gravel pits will drive property values downward. During these economically challenging times, why would Rocky View County push through this application for the sole benefit of 1410266 Alberta Ltd., while at the same time hurting the long-term prosperity of the Big Hill Creek Estates residents?
6. Traffic will interfere with the well-established community due constant heavy traffic, road congestion, road damage, and serious harm to wildlife.
7. Income that Rocky View County gains from this gravel pit will not cover the costs of environmental remediation, road repair, nor replacing healthy water for many residents that depend on this water source. This will all lead to higher taxes while dropping our property values. It is doubly detrimental.

Sincerely,
James and Jill Schmitt

Michelle Mitton

From: [REDACTED]
Sent: Sunday, February 14, 2021 12:38 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C-8051-2020

Follow Up Flag: Follow up
Flag Status: Flagged

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The proposed Summit Pit at Range Road 40 is a serious risk to the integrity and history of the Big Hill Springs Provincial Park. Protect Alberta Parks!
There are already too many gravel pit applications in Rocky View County, especially along Big Hill Springs Road.

Please note for the record: I am totally opposed to the Master Site Development Plan for this operation.

Janet Jones
SW 31 25 2W5 144 006 377

Michelle Mitton

From: Joanne Leskow [REDACTED]
Sent: February 17, 2021 1:07 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Big Hill Springs grace pit opposition

Follow Up Flag: Follow up
Flag Status: Flagged

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I am against ANY and ALL gravel pit development or presence in, near, adjacent or impacting the Big Hill Springs Park (BHSP) area and designation.

Big gravel got tossed from Bearspaw by rich landowners and they must not be allowed to set up shop here either.

Joanne

30 year resident of Rockyview and BHSP user.

Sent from my iPhone

Michelle Mitton

From: Marg or John MORCK [REDACTED]
Sent: Saturday, February 13, 2021 5:13 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Reference: Bylaw C-8051-2020 (Mountain Ash Application PL 20200031)

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

To Whom it May Concern in Rocky View County Council:

I just heard about the recent application to the Rocky View County from Mountain Ash Limited Partnership for an open pit gravel mine immediately northwest of the Big Hill Springs Provincial Park.

PLEASE, PLEASE, do NOT approve this application! Having such a large open gravel mine so close to the Big Hill Springs Provincial Park would have a huge negative impact on this park. We frequent this park a great deal and enjoy it every time we visit. It has great trails for walking and picnic tables for enjoying after our hike. We love its close proximity to Calgary. The Province values this park a great deal, which is evidenced by the fact that it has been closed this past summer for upgrading. We have missed it this past summer, but were confident the improvements planned would be worthwhile when it re-opened.

We, along with other members of our hiking club, the Calgary Weekend Hikers have also frequently enjoyed hiking along the Bighill Creek, south of the Park closer to Cochrane, so would hate to see any of this valuable waterway and valley damaged in any way.

When we heard about the possibility of a huge open gravel pit so close, we could hardly believe such a thing was even being considered. So PLEASE, PLEASE, do NOT approve this application!

John and Margaret Morck
123 Silver Valley Blvd NW
Calgary, AB T3B 4B7
[REDACTED]

Michelle Mitton

From: [REDACTED]
Sent: February 17, 2021 8:50 AM
To: Legislative Services Shared
Subject: [EXTERNAL] - BYLAW C-8051-2020
Attachments: FBHSPP_JF submission_Feb 12_2021 Rev1.pdf

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

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Dear Council Members;

My name is Dr. Jon Fennell and I am a professional hydrogeologist and geochemist in good standing the Association of Professional Engineers and Geoscientists of Alberta (APEGA). I am also a resident of Rocky View County and user of Big Hill Springs Provincial Parks. I have been supporting a group, Friends of Big Hill Creek Provincial Park, with their opposition of the Mountain Ash Limited Partnership (MALP) application to establish a gravel pit (the Summit Pit) in close proximity to the Park. I share a number of concerns that the "Friends" do regarding this development. I will not belabour them, as I am sure they are very similar to concerns expressed by others, but they basically boil down to the following:

Background facts:

- Big Hill Springs Provincial Park is a unique ecological setting of significant value for people and wildlife.
- The springs that form the headwaters of this park provide cool, clear water of relatively stable temperature that flows from an extensive sand and gravel aquifer system trending off towards the northwest.
- The water that flows from the springs forms Big Hill Springs Creek, which eventually flows into the Bighill Creek system supporting up to 50% of the flow in that water course.
- The temperature regulation provided by Big Hill Springs Creek is responsible for the development of unique aquatic habitat in Bighill Creek
- Bighill Creek is identified on Fisheries and Oceans Species At Risk website as being protected for Bull Trout populations.
- There is habitat restoration potential in Bighill Creek for other cold water fish, like the West Slope Cutthroat Trout.

Issues related to MALP and other gravel mining developments:

- The MALP property is located in the sensitive headwater area of the Big Hill Springs complex, and is located at the downstream end of the large sand and gravel complex.
- MALP proposes to mine the sand and gravel from this headwater area to a depth of 1 m above the water table.
- The removal of up 20-30 m of this gravel will significantly reduce the ability of the aquifer to filter out natural and/or introduced contaminants that will occur as part of this development.
- The exposure of the sand and gravel will increase its ability to weather and release harmful trace elements into the groundwater, such as arsenic, cadmium, chromium, selenium, and others.
- Baseline investigation of the local groundwater by MALP indicates that these trace elements are already in the water, which increases the risk of further contamination during and following pit development.

- Contaminants released into the groundwater (natural or development-related, like fuels or chemicals) will flow through a significantly reduced gravel layer and into the fractured bedrock where they will move the springs and discharge with minimal attenuation.
- Once in Big Hill Springs Creek they will move down into the Bighill Creek and impact sensitive and protected the aquatic habitat, possibly triggering a Fisheries Act violation.
- Remediation of any contamination will be extremely difficult and may inadvertently impact the springs further by intercepting groundwater that would otherwise report to them.
- MALP has not assess **any** of this risk, and instead is insisting that their development will not cause harm. This insistence is unsubstantiated with any proof or modelling results and it is left up to faith. This is not a balanced of comprehensive communication to the Council members by MALP.
- This is not the only gravel development that may happen in this sensitive headwater area, as there are other gravel leases even closer to the park boundary and the springs that threaten their viability and support of Bighill Creek (i.e. cumulative effects risk)

The proposal:

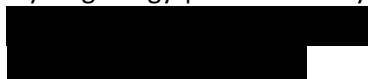
- To ensure prudent and sustainable gravel mining in the area, establish a development setback around the Park and springs complex to preserve the ecological integrity and recreational value of the area.
- The proposed setback is 1.6 km around Big Hill Springs Provincial Park, where no gravel development would be allowed. This would be followed by an additional 1.6 km of gravel mining restriction to limit the excavation to within 4 m of the water table (as opposed to the usual 1 m) to ensure proper contaminant filtration capability and attenuation.
- The proposed setback distances are based on works of other that have documented impacts from sand and gravel extraction occurring around such developments.

I have attached a rather lengthy technical document to support my position, and that of the “Friends”. Much of it is personal credentials, but the front material is there to provide you with the basis to make an informed decision on the MALP application (and any others that threatened the Park and the springs). Unfortunately, what has been presented by MALP does not even begin to explore the issues of their proposed development and the related risks to the environment. **If you are not inclined to read my full report, I ask that you at least read the Executive Summary** where I have outlined the main issues and recommendations (it is only 2 pages).

The recent decision made by the RVC Council to deny the Scott Pit in Bearspaw was a good and prudent decision protecting the rights of the people over profit. The use of that land for gravel extraction is clearly incompatible with the country residential setting. Denying the MALP application, and any others that want to establish in the headwater area of Big Hill Springs Provincial Park, would be an equally good and prudent decision in favour of the environment, while still allowing gravel development occur in less sensitive and important areas. To truly be sustainable, one needs to balance the economic considerations against the needs of the people and the environment, and by establishing a suitable development setback around the Park this will be achieved.

Respectfully,

Jon Fennell, M.Sc., Ph.D., P.Geol.
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Mountain Ash Limited Partnership

Summit Gravel Pit

Review of hydrogeology, geochemistry, fish and aquatics, and climate change

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On behalf of:

Friends of Big Hill Springs Provincial Park
and
Bighill Creek Preservation Society

For:

Rocky View County Council
Re: Bylaw C-8051-2020

February 2021



Water flows over lumpy deposits of tufa at Big Hill Springs Provincial Park

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Executive Summary

Mountain Ash Limited Partnership (MALP) is applying to develop an open pit gravel mine in the headwaters area of Big Hill Springs Provincial Park. This is one of many aggregate developments likely to come forward in the future given the land ownership in this area. The sand and gravel is being extracted from a buried channel system that is already being mined by Hillstone Aggregates 800 m to the west.

Big Hill Springs Provincial Park, and the spring complex that feeds water down into the fish-bearing Bighill Creek, is located roughly 800 m southeast of the MALP property. This creek is currently listed on the Fisheries and Oceans Canada "Aquatic species at risk map" possibly having bull trout (i.e. a protected species). Big Hill Springs Provincial Park (the Park) was established back in 1957 and is a cherished and unique ecological enclave located in a prairie farmland setting that receives over 250,000 visitors each year. It is so popular that upgrades are currently underway to ensure that Park's visitors continue to enjoy its redeeming qualities.

The flow of water from the springs originates from groundwater that discharges from a buried sand and gravel-filled channel system and the underlying fractured Paskapoo Formation bedrock. The MALP site is located on top of the south-west section of the aquifer that supplies the springs. The almost constant temperature and quality of the groundwater that sustains these springs year-round is responsible for the development of unique fish habitat in Bighill Creek. Therefore any impacts to that water threaten the aquatic ecology in the local area. Similarly, local residents rely on the local groundwater for their daily consumptive needs. This will be placed at risk if subsurface development activities lead to contamination of their water wells.

MALP's proposal to the Rocky View County Council is to mine the sand and gravel from beneath their property to within 1 metre of the water table. This will remove the vast majority of the filter that protects this important aquifer system in the headwater area of the Big Hill Springs complex. In doing so this places the remaining aquifer and groundwater discharging at the springs at risk of contamination during open pit operations and post-reclamation.

The proposal submitted by MALP is lacking in critical detail and is conceptual at best. The potential issues regarding impacts to Big Hill Springs and Bighill Creek have not been sufficiently explored or communicated. This includes no evaluation of how removal of a substantial part of this aquifer might affect the local aquatic environment (and terrestrial wildlife habitat).

Despite MALP's contention that the "above water table" gravel mining operations will not adversely affect local groundwater conditions, evidence from elsewhere indicates the opposite. Studies have found increased water table elevations and notable changes to groundwater quality due to the reduced filtration from overlying sediments. It is noteworthy that the pre-mining groundwater quality reported by MALP

indicates the presence of contaminants like **arsenic, cadmium, chromium, and selenium** at concentrations above those listed for the protection of freshwater aquatic life.

Mining of the sand and gravel will expose the aquifer to atmospheric oxygen and enhanced weathering processes. This will also increase flushing of the remaining sand and gravel deposits with infiltrating waters. The removal of this essential filter will increase the risk of mobilizing fine particles, harmful trace elements like the ones already noted, and other contaminants like spilled fuels or process chemicals, into the local groundwater. Once mobilized, these contaminants will be difficult to recover before they reach fish-bearing waters and may eventually result in provincial and/or federal violations under the *Environmental Protection and Enhancement Act*, the *Fisheries Act*, or the *Species at Risk Act*.

Unfortunately, MALP has not addressed any of these critical environmental issues in their 2020 Master Site Development Plan or Hydrogeological Assessment Report (SLR 2020). As a result, the Rocky View County Council does not have enough information to make an informed decision regarding this application (including any potential future liability that could result from its approval).

There are plenty of other less environmentally-sensitive sand and gravel deposits throughout Rocky View County. Because of this, the responsible and sustainable response to MALP's application is to protect Big Hill Springs Provincial Park and the Bighill Creek system by establishing a suitable development buffer around these features.

A setback distance of at least 1.6 kilometers is therefore recommended. Also, to further protect groundwater quality in this important headwater area, sand and gravel extraction within and additional 1.6 kilometers of this setback should be restricted to at least 4 metres above the water table to ensure suitable filtration of recharging water.

Proper consideration of future climate change effects should also be addressed to protect against extreme events that may result in unintended damaging releases from the site into the area's groundwater. This important issue has also been overlooked by MALP.

Implementing these recommended land use planning steps will protect local groundwater quality that feeds the sensitive aquatic system in the area, and ensure the protection of local water wells, while still allowing prudent gravel development to occur.

Introduction

Mountain Ash Limited Partnership (MALP) has put forward a plan to develop a sand and gravel (aggregate) open pit mine near the headwaters areas of Big Hill Springs Provincial Park. The plan is to strip overburden materials and stockpile them for later use during reclamation, followed by excavation, crushing, and screening of the aggregate for transport to market. Excavation of the pit is proposed to be kept to within 1 metre of the historical high-water mark of the local water table. Despite this, there are significant environmental concerns regarding this development and how appropriately the site conditions and the operational disturbance have been assessed. The main concerns with this proposed development relate to the following:

1. Proximity to the Big Hills Springs Park (and the potential for impacts to the unique system of springs and Bighill Creek, which is fed by these springs).
2. Risk of potentially irreparable adverse impacts to groundwater quality (and associated effects to nearby receptors).
3. Potential risks for protected fish and fish habitat (including aquatic species that support fish populations known to be present in Bighill Creek).
4. Questionable success of any mitigation (including post-reclamation timeframes) that might be necessary.
5. Risks associated with climate change (and the impact to safe mine operations and reclamation efforts).
6. Cumulative effects (from other similar developments extracting gravel near the Big Hill Springs headwater area and along Bighill Creek).

The Friends of Big Hill Springs Provincial Park (FBHSPP), a local landowner group, and the Bighill Creek Preservation Society (BCPS), a local watershed group mandated to develop a watershed plan for the Bighill Creek basin, are concerned for the future of the springs should this, or any other similar development, be approved by the Rocky View County Council. Both groups would like to see a protective buffer established around this unique and popular prairie setting. To assess the appropriateness of such an initiative, the group retained Dr. Jon Fennell to review and comment on the MALP's 2020 Master Site Development Plan and associated Hydrogeological Assessment Report (SLR 2020). Dr. Fennell is a Senior Hydrogeologist, Geochemist, and Water resource Specialist with over 30 years experience in environmental and contaminated sites investigations, risk analysis, and climate change assessment. He is a registered member-in-good-standing with the Association of Professional Engineers and Geoscientists of Alberta (APEGA),

among other similar agencies in Western Canada. Further information regarding Dr. Fennell's credentials is provided in Appendix 1.

The remainder of this report summarizes the critical environmental issues that the RVC Council need to consider regarding this and any other similar developments near the Big Hill Springs Provincial Park and Bighill Creek system.

Key Findings

1. Proximity to the Big Hill Springs Provincial Park

The proposed MALP gravel pit is located in the west half of Section 31, Township 26, Range 3 West of the 5th Meridian and consists of 131 hectares (or 323 acres) of land designated as Ranch & Farm District under Rocky View County's Land Use Bylaw C-4841-97. The aggregate deposit that MALP is intending to mine is part of a large, buried sand and gravel deposit that extends towards the northwest for up to 10 km or so. This large accumulation of granular material, which ranges in thickness anywhere from less than 10 m up to almost 30 m, was formed during the last glaciation of the area and was deposited in a former valley eroded into the underlying bedrock of the pre-glacial landscape. Given the hydraulic properties of the sand and gravel aquifer it classifies as a Domestic Use Aquifer¹.

Overlying the sand and gravel deposit is anywhere from 3-6 m of glacial till consisting of clay and silt, with some sand and rocks, followed by about 30-60 cm of topsoil. Underneath the sand and gravel deposit is bedrock of the Paskapoo Formation comprising layers of sandstone, siltstone, and shale/mudstone sequences. These bedrock deposits have been subjected to fracturing and faulting as a result of deformation during formation of the Rocky Mountain foothills area and offloading of thick glacial ice between 10,000-15,000 years ago².

The footprint of the MALP property is located approximately 800 m from the boundary of Big Hill Springs Provincial Park, a very popular recreation spot for locals, Calgarians, and tourists visiting the area. It is a unique ecological enclave surrounded by farmlands that has considerable recreational and environmental value. The land area that is intended to be mined comprises gently rolling terrain with drainage towards the south and east across the property. The southern half of the proposed development has an abrupt change in elevation from 1292 metres above sea level (masl) to 1272 masl due to the presence of a large drainage-way leading down to the Big Hill Springs complex. Within this drainage-way is a small intermittent tributary stream located approximately 300 m to southeast of the property boundary that also leads down to the springs. This tributary is documented by SLR Consulting (Canada) Ltd. as being fed only by surface

¹ Alberta Government 2019

² Moran 1986

drainage (SLR 2020); however, it is very likely that groundwater in the local sand and gravel deposits, as well as the upper bedrock, discharge to this tributary stream at some point further downslope from its origin.

Big Hill Springs is a spring complex fed by the very same groundwater residing in the sand and gravel deposit that MALP intends to mine for aggregate resource. Investigative work done by SLR during the period of 2014 to 2019 found the water table to be located at a depth of up to 30 metres below surface on the upland portion of the site, and a depth of around 12 metres at the southern end where the land surface drops down into the drainage-way. The springs flow year-round at rates ranging from 0.4 to 0.1 cubic metres per second and eventually discharge into Bighill Creek – a fish-bearing water body indicated as having protected bull trout, which is a threatened species under the Species at Risk Act (SARA). The water from Bighill Creek eventually discharges into the Bow River at the Town of Cochrane. The relatively stable (and cool) temperature of the spring water (around 6°C), and its high quality (low mineralization and turbidity), has led to development of local habitat that supports various vegetation, wildlife, and aquatic species. As such, the Big Hill Springs, the established Park area, and the associated ecology are an important aspect of Bighill Creek’s ability to sustain ecological viability.

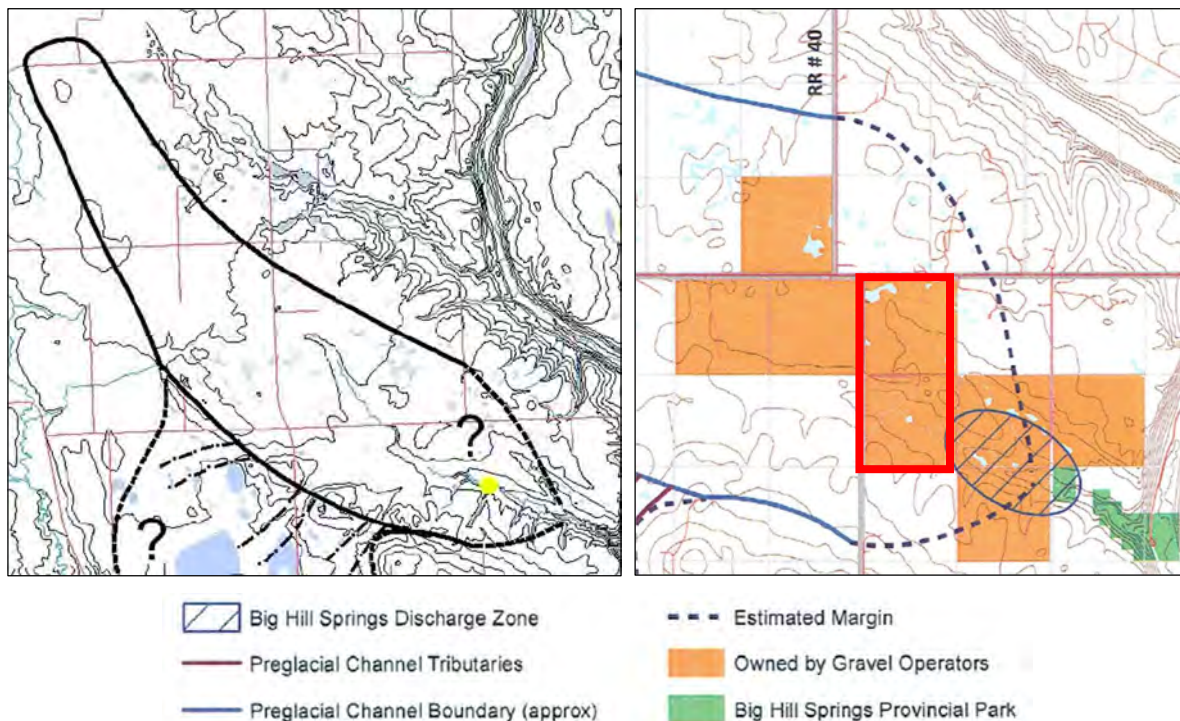


Figure 1. Mapped preglacial channel for Big Hill Springs (left)³, where dot-dashed lines indicate extent of buried tributaries, and extent of lands owned by gravel operators near Big Hill Springs Provincial Park (right)⁴ *Note: MALP property outlined in red.*

³ Excerpt from Figure 22 of Poschmann S. (2007)

⁴ Excerpt from a figure provided by Bighill Creek Preservation Society

The MALP development is not the only pressure facing the headwater area of Big Hill Springs complex. In addition to the MALP proposal there are a number of other land parcels that are currently owned by gravel operators, the locations of which are shown in Figure 1. It is clear from a review of this map that there are numerous locations where gravel could be mined, if approved, included areas right up against the Park limits and the spring complex itself. It is also clear that the MALP property itself (outlined in red) impinges on the identified discharge zone for the springs.

It is MALP's opinion that development of their sand and gravel pit will not adversely affect the quality and quantity of water reporting to the Big Hill Springs complex as they only intend to mine down to within 1 metre of the historical high-water level for the local water table. Although the final pit depth is yet to be established, MALP assumes that the operation will be a dry pit configuration, and no dewatering of the gravel will be required, thus no drawdown impact to the groundwater underneath. In fact SLR goes on to say in their technical report that the development will actually increase the recharge of water to the sand and gravel left in place, which they consider to be a "positive" effect. However, there are some significant considerations that contradict that position. These will be explained in the paragraphs and sections that follow.

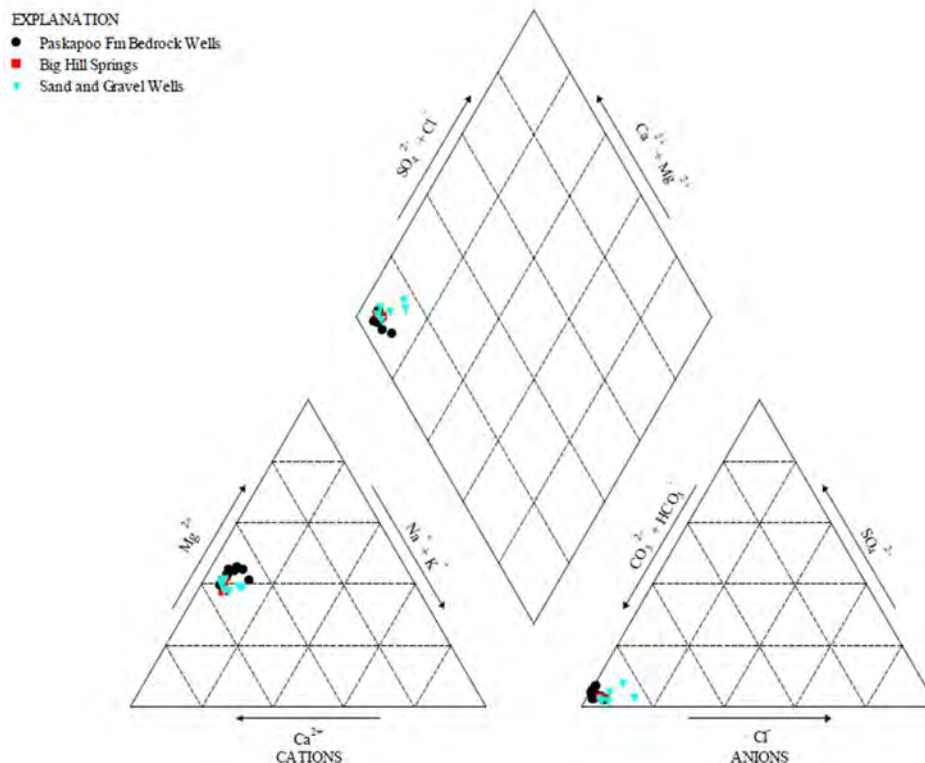


Figure 2. Piper plot showing similarity of water chemistry from various sampling locations (i.e. the sand and gravel monitoring wells established on the MALP property, nearby domestic water wells completed in the bedrock, and Big Hill Springs)⁵

⁵ Figure 1 from SLR's Hydrogeological Assessment Report (2020), pdf page 19 of 335.

Results of SLR's hydrogeological assessment clearly indicate that the groundwater in the sand and gravel deposits and fractured upper bedrock, and the water discharging at the Big Hill Springs complex, are chemically the same. This is demonstrated by the similarity of major ion compositions in the Piper plot prepared by SLR (Figure 2).

Given this evidence of this hydraulic connectivity, any changes to groundwater quality or quantity within the excavated footprint of MALP's gravel pits will eventually manifest themselves at the Big Hill Springs complex and eventually Bighill Creek. Based on the calculated groundwater flow direction to the southeast and a velocity of about 300 m/year, using data from SLR (2020), the estimated travel time for groundwater to move from MALP's property to the springs is 2-3 years. This is considered a rather short timeframe for groundwater flow and places the springs at considerable risk of adverse impacts from any contaminants that might originate from pit operations or reclaimed areas. Figure 3 shows the locations of monitoring wells (MW-series) and local water wells (WW-series) used in the SLR's 2020 site assessment.



Figure 3. Location of monitoring wells and local water wells (used in the 2020 SLR Hydrogeological Assessment) and mapped water table elevations and contours⁶. (Note: blue arrow indicates direction of flow)

2. Risk of impact to groundwater quality

Results of the SLR (2020) investigation indicate that natural groundwater is already affected to some degree by certain metals and trace elements at concentrations above Guidelines for Canadian Drinking Water (GCDWQ)⁷. These, include:

⁶ Drawing No.4 from SLR's Hydrogeological Assessment Report (2020), pdf page 43 of 335.

⁷ Health Canada (2020)

- Aluminum
- Arsenic
- Barium
- Cadmium
- Chromium
- Iron
- Lead
- Mercury

It is also stated in the SLR (2020) report that the reason for detections of metals and trace elements above GCDWQ is turbidity from their wells, which ranges from below detection levels (<0.1 NTU) up to >4000 NTU (see Tables section in this report). This is a common occurrence when turbid water samples are analyzed for Total Metals, and usually results from the preservation of unfiltered water samples with laboratory-grade nitric acid. When assessing water sample collected by SLR with low turbidity values (<10 NTU), the exceedances of GCDWQ values become restricted to a lesser number of elements:

- Aluminum
- Barium
- Iron
- Lead
- Manganese

It is important to note that the groundwater beneath the area does not just support drinking water supplies. It also sustains the flow of water at Big Hill Springs, which also provides significant discharge to the fish-bearing Bighill Creek to the east. When guidelines for the protection of freshwater aquatic life, or FWAL⁸, are applied to the groundwater monitoring results the following elements exhibit concentrations above long-term chronic guidelines:

- Aluminum
- Arsenic
- Cadmium
- Chromium
- Copper
- Iron
- Lead
- Selenium
- Zinc

Review of water quality at the Big Hill Springs complex itself, as reported by SLR (2020) and summarized in the Tables section of this document, does not indicate concentrations of many parameters exceeding the FWAL guidelines. Only the occasional aluminum, chromium, and selenium exceedances are noted. Similarly, results from water samples collected from Bighill Creek near the location where Big Hill Springs discharges into it, also provided in the Tables section of this report, indicate the following elements occasionally approaching or exceeding FWAL guidelines⁹:

- Aluminum
- Cadmium
- Chromium
- Iron
- Selenium

⁸ Alberta Government (2018). Environmental Quality Guidelines for Alberta Surface Waters.

⁹ Fouli Y. (2020)

It is therefore clear that naturally-elevated concentrations of various metals and trace elements are already present in the groundwater and surface water of the study area, and that the aquatic habitat and fish within the Big Hill Springs and Bighill Creek system are already exposed to them. The question that remains unanswered by MALP is:

“How will the excavation of sand and gravel at their proposed pit, exposure of the remaining sand and gravel to oxygen in the atmosphere, and enhanced recharge through a relatively thin layer of remaining sand and gravel above the water table affect the mobility of contaminants (i.e. metals, trace elements, nutrients, turbidity and any other constituents associated with their operation) into the groundwater used by local residents, and discharge that supports the Big Hill Springs, and eventually flow in Bighill Creek?”

It is a well-known fact that when buried sediments are excavated and exposed to the atmosphere the local geochemical conditions change. The increased chance of mineral oxidation combined, with the usual wetting and drying cycles from recharge and rainfall events, work to enhance weathering and leaching reactions and ultimately the release of various constituents into the local groundwater. Table 1 provides an example of how the water quality beneath “above water table” gravel pits can change¹⁰.

Table 1. Example of difference in natural groundwater and groundwater measured 2.5 m below above watertable gravel extraction areas (Source: Hatva 1994)

Parameter	Rainwater <i>n</i> = 12			Natural groundwater areas <i>n</i> = 43-60			Gravel extraction areas <i>n</i> = 76-240			
	Md	min	max	Md	min	max	Md	min	max	
Temperature	°C			4.7	1.1	6.8	5.6	0.0	8.8	
Acidity	pH	4.5	4.1	6.3	6.4	5.6	7.3	5.9	5.4	7.3
Conductivity	mS m ⁻¹	4.0	2.0	9.0	6.0	3.0	9.0	7.0	4.0	19.0
Carbonic acid	mg l ⁻¹				11.0	2.0	44.0	24.0	2.0	62.0
Bicarbonate	mg l ⁻¹				25.0	15.0	38.0	20.0	8.0	45.0
Chloride	mg l ⁻¹	1.0	1.0	3.5	2.0	1.0	7.0	3.0	2.0	37.0
Sulphate	mg l ⁻¹	2.0	0.5	3.0	4.0	4.0	12.0	10.0	5.0	16.0
KMnO ₄ -consump- tion	mg l ⁻¹				3.0	0.0	9.0	2.0	0.0	51.0
Hardness	°dH				1.0	0.5	1.5	1.0	0.5	3.0
Nitrate	mg l ⁻¹	2.1	1.4	6.7	0.4	0.0	4.0	1.9	0.0	11.5

Note: *n* = number of samples; Md = median values

What is most striking about the change in median values from natural groundwater areas to gravel extraction areas is the slight increase in temperature (4.7 to 5.6°C) and reduction in pH (6.4 to 5.9), the 2 times increase in carbonic acid (11 to 24 mg/L), and 2.5 times increase in sulphate (4 to 10 mg/L). It is the carbonic acid that is of most significance given its importance in mineral weathering and other surface-related reactions involving minerals with trace elements adsorbed to their surfaces (e.g. clays). The increase in nitrate (0.4 to

¹⁰ Hatva T. (1994)

1.9 mg/L) is evident and associated with the reduced protection to the underlying groundwater from removal of the protective soil cover. Removal of this material effectively reduces the attenuating, or filtering, capacity of the remaining material below before the infiltrating water reaches the underlying water table.

Once released into the local groundwater environment, geochemical conditions will dictate the mobility and toxicity characteristics of contaminants released. Chromium, for example, tends to be more mobile and toxic under oxygenated conditions, and exists in the hexavalent form as chromate ions (CrO_4^{2-}). Similarly, selenium exists as selenate (SeO_4^{2-}) and selenite (SeO_3^{2-}) species, with selenite being the more toxic and mobile form. Figure 4 provides Eh-pH diagrams showing the various stability fields for chromium and selenium species in water. The red dots indicate the type of Eh and pH conditions that would be expected in well-oxygenated recharge water moving through a relatively thin layer of residual sand and gravel beneath a gravel pit (like MALP's).

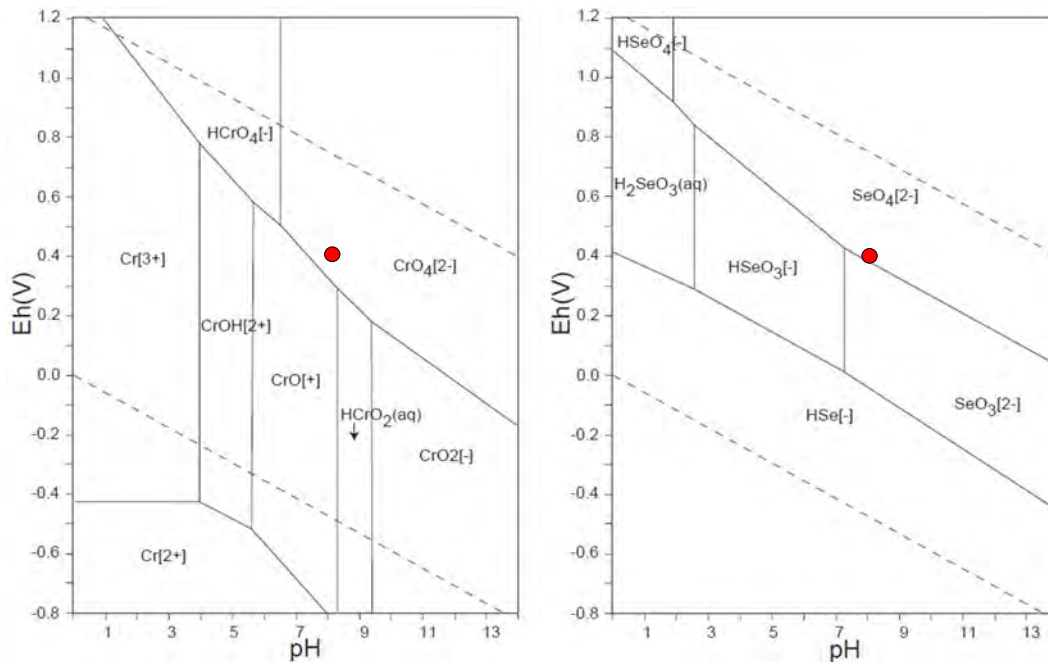


Figure 4. Eh-pH diagrams for chromium (left) and selenium (right)¹¹. (Note: red dots represent conditions expected in well-oxygenated groundwater delivered by recharge through a thin remaining layers of gravel)

The potential for mobilization of fine particulate matter and/or colloids¹² into the groundwater as a result of MALP's mining operations also exists. Removal of the protective cover of glacial till, followed by a significant reduction in the thickness of the sand and gravel deposit, will leave a small amount of material

¹¹ Atlas of Eh-pH diagrams

¹² Colloids are very low diameter particles (1 nanometer, or 10^{-6} mm to 1 micrometer, or 0.001 mm) which are responsible for the turbidity or the color of water. In fast moving groundwater systems such particles can remain suspended and move considerable distances due to the physical lifting effect of the water and associated charge characteristics (positive, negative, or neutral).

above the water table. This residual sand and gravel will be exposed to increased infiltration and weathering of minerals by infiltrating runoff. The enhanced recharge of water will increase the ability to flush fine particulate matter into the underlying groundwater and eventually into the fractures of the upper bedrock. The local water table will also have a high probability of increasing above the normal range of variability. An example of the increase in groundwater levels below natural versus developed areas is provided in Figure 5.

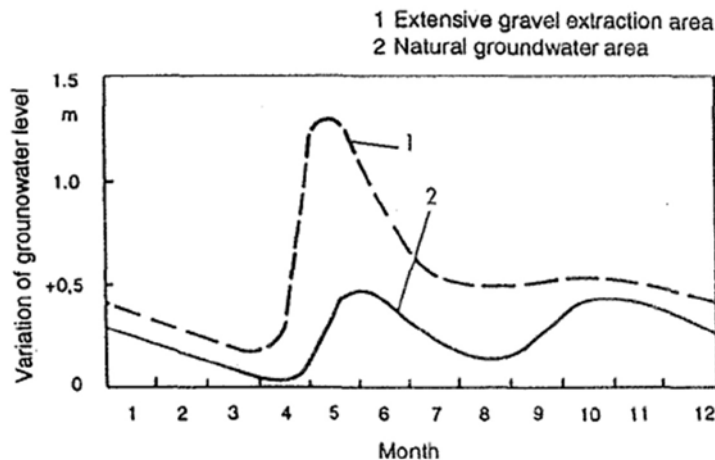


Figure 5. Example of expected increase to water table due to above water table gravel extraction operations (Source: Hatva 1994)

Turbidity issues have been documented at gravel pits, with measurable effects being noted as far as 1.8 km downgradient of those operating areas¹³. The following quote is taken from Mead (1995), indicating the significant distance that turbidity plumes can travel through permeable sand and gravel deposits:

“This DEQ study found a turbidity plume that extended more than a mile to the north (downgradient) of the gravel operation. The average turbidity of the water being discharged from the washing operation into the pond at the site was 2,737 nephelometric turbidity units (NTUs). Nearly all wells sampled within the first 6,000 feet of the turbidity plume were measured at 5 NTU or more. Many wells within the first 3,000 feet of the plume had turbidity levels of 10 NTU or more. Nearly all wells outside the plume had turbidities of 2 NTU or less.”

The most consistent position of most regarding turbidity movement within the subsurface is that the fine particles will be strained out in the pores of the granular material. However, this may not apply to the very small particles, or colloids, that can still make their way through the soil grains and continue on. For reference, Alberta’s FWAL turbidity guideline for long-term exposure (>24hr) in clear running waters is

¹³ Mead R.D. (1995)

2 NTUs above background levels. Based on data provided by SLR (2020), and included in the Table section of this report, the background turbidity in the groundwater beneath the MALP property is generally less than 1 NTU. Therefore the risk of increasing local turbidity values in the groundwater exists.

Another concern that has not been addressed, at all, is the potential for leaching of inorganic or organic constituents from the previously disturbed soil materials placed back over the excavated areas once mining and reclamation activities are complete. The fact that the till is clay-rich and will likely have some metals and trace elements that could be leached by infiltrating precipitation of naturally lower pH presents an additional risk. For reference, the average pH of precipitation in the Calgary area is around 6, with a minimum of around 4.9¹⁴. The reason for the pH values below neutral (pH 7) is the equilibration of the atmospheric moisture with carbon dioxide (CO₂) and the formation of carbonic acid (H₂CO₃). Other constituents like oxides of sulphur and nitrogen gases released from things like sour gas plants and agricultural lands development can also serve to reduce the pH through the development of sulphuric acid (H₂SO₄) and nitric acid (HNO₃). Such pH values are considered mildly acidic and therefore can enhance minerals weathering reactions.

The risk associated with the release of harmful metals and trace elements, as well as other things such as nutrients, turbidity and other site-specific contaminants (e.g. fuel spills), into the local groundwater is twofold:

- i) these constituents can eventually impact local water wells, and
- ii) they can eventual discharge at Big Hill Springs resulting in increased loading of nutrients and harmful constituents to Bighill Creek, thus compromising sensitive fish habitat.

3. Potential issues for fish and aquatic habitat

The presence of naturally-elevated concentrations of trace elements in the local groundwater is a clear indication that the geochemical conditions in the area are conducive the mobilization. With the exposure of the open gravel pit areas to atmospheric oxygen and increased recharge, there is increased risk to mobilize even more of these harmful trace elements into the groundwater and eventually Big Hill Springs, either in dissolved form or associated with colloidal material in a process known as “facilitated transport”. As noted earlier, the groundwater that feeds the Big Hill Springs complex eventually discharges to Bighill Creek, adding up as much as 20 to 50% of its flow¹⁵ and regulating its water temperature.

MALP’s application documents fail to explore the topic of fish and fish habitat and therefore this aspect has not been considered as a “valued component” in the assessment process. A search of Fisheries and

¹⁴ Alberta precipitation quality monitoring program website

¹⁵ Fouli Y. (2020); BRBC (2020)

Ocean Canada website, showing the location of stream protect under the Species at Risk Act, identified bull trout, which is a protected species (Figure 6).

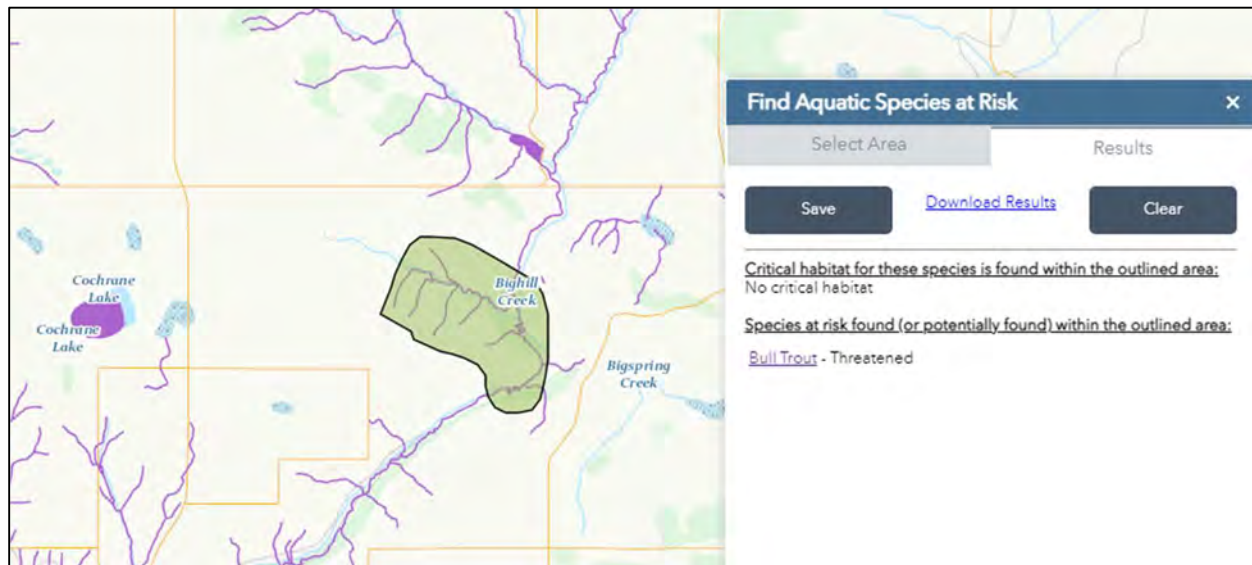


Figure 6. Excerpt from the Fisheries and Oceans Canada Aquatic species at risk map (Note: area shown in green indicates the Big Hill Springs headwaters and the confluence with Bighill Creek)¹⁶

A report prepared for the BCPS by Trout Unlimited Canada (TUC)¹⁷ identified a number of fish species in Bighill Creek, in particular long nose dace, brook trout, brown trout, longnose/mountain/white sucker, mountain whitefish, and rainbow trout. As noted earlier, the *SARA*-protected bull trout species is also identified. At the location where discharge from Big Hill Springs enters Bighill Creek there is a significant lowering of stream water temperatures and the development of unique habitat for cooler water fish species. As noted by TUC:

“The highest density of Brook Trout within reach 4 occurred at the confluence of Bighill Creek and Bighill Springs Creek, likely due to the thermal preference of Brook Trout for the cold water from Bighill Springs. The water temperature in Bighill Springs Creek was dramatically colder than all other sites and only supported Brook Trout.”

Additionally, results from a 2019 biomonitoring program¹⁸ using environmental DNA metabarcoding identified that the highest species richness is noted in this reach of Bighill Creek, underscoring the importance contributions of water from Big Hill Springs in providing unique aquatic habitat¹⁹.

¹⁶ Fisheries and Oceans Canada

¹⁷ TUC (2018)

¹⁸ Hajibabaei Lab 2019

¹⁹ Fish habitat means water frequented by fish and any other areas on which fish depend directly or indirectly to carry out their life processes, including spawning grounds and nursery, rearing, food supply, and migration areas.

Because fish frequent Bighill Creek, the greatest risk posed by MALP's (or any other) pit development in the headwaters areas of the Bighill Creek system is the altering of groundwater quality and eventual impact to aquatic receptors from discharge of contaminants released into groundwater reporting to that water course. This has particular relevance with respect to metals and trace elements that SLR has shown to be already present at elevated concentrations in the groundwater beneath MALP's property. Spills of fuels, lubricants, and other chemicals used during the gravel mining process is also a concern.

In Alberta, the *Water Act*, *Environmental Protection and Enhancement Act*, *Wildlife Act*, and their associated regulations are the main legislative instruments that provincial regulators rely upon when reviewing development applications such as this. This review process is meant to determine:

- i) if the application is sufficient and complete,
- ii) whether the potential impacts to wetlands, water bodies, fish and fish habitat (as well as wildlife) are adequately described,
- iii) whether proposed avoidance and mitigations are appropriate, and
- iv) whether the project should be approved, modified, or rejected.

Federally, the *Fisheries Act* and *Species at Risk Act* are the main legislation that address fish-related issues (as well as vegetation and wildlife) associated with development activities. In particular, under the *Fisheries Act* no one is to create a situation where there will be harmful alteration, disruption or destruction (HADD) of fish habitat. Equally, the release of deleterious substance is forbidden. The relevant excerpts from the Act are as follows:

Section 35:

Harmful alteration, disruption or destruction of fish habitat

35 (1) No person shall carry on any work, undertaking or activity that results in the harmful alteration, disruption or destruction of fish habitat.

Section 36:

Deposit of deleterious substance prohibited

(3) Subject to subsection (4), no person shall deposit or permit the deposit of a deleterious substance of any type in water frequented by fish or in any place under any conditions where the deleterious substance or any other deleterious substance that results from the deposit of the deleterious substance may enter any such water.

It is clear that MALP has failed to adequately address the potential impacts to Bighill Creek and the groundwater feeding Big Hill Springs that eventually discharges into it, and therefore the potential impacts to fish and fish habitat.

The main challenge facing the RVC Council in assessing MALP's pit application, and any other similar applications close to the Big Hill Springs complex and/or Bighill Creek itself, is the potential adverse impacts to fish or fish habitat including the aquatic species that support those fish. Allowing the development of gravel pits too close to the headwaters of Big Hill Springs, or other critical areas along Bighill Creek itself, where the release of dangerous and deleterious substances like **arsenic, cadmium, chromium, selenium**, etc. can occur may trigger a contravention of provincial and/or federal Acts. This application has yet to be reviewed by Alberta Environment and Parks (AEP) and/or the Department of Fisheries and Oceans (DFO), and therefore it is premature to approve any such application where the risk to fish and fish habitat has not been properly considered or assessed.

4. Success of any mitigation

The preceding evidence and examples of how "above water table" sand and gravel pits can alter groundwater conditions (both physically and chemically) demonstrates that it is likely that contaminants and particulate matter will be released into the local groundwater from MALP's development, should it proceed. The risk of this occurring has obviously not been assessed by MALP with appropriate calculations or geochemical modelling. Therefore it would be left up after-the-fact monitoring to detect these contaminants and signal the need for responsive actions. However, once detected these contaminants are already on the move and will require mitigation before they reach and negatively impact a nearby receptor like a water well or spring. Again, MALP has provided no evidence that they have considered this aspect, including what they would propose do in the event of such an occurrence. A more proactive stance would be appropriate considering the risks posed.

A typical approach to a contaminant release is establishing a groundwater recovery well, or wells, to intercept impacted groundwater before it can reach a receptor. Pumping effectively creates a capture zone where contaminants are pulled in and recovered to the surface where they can be dealt with accordingly. In MALP's location a recovery system operating this close to the Big Hill Springs complex would capture of groundwater that would otherwise report to (feed) those springs, and possibly local water wells. And, if the recovery wells needed to be installed in the bedrock, because of low groundwater levels below the remaining sand and gravel deposits, this could pull contaminants and particulate matter down into the fracture networks and become even more of a challenge.

If groundwater recovery is not viable, then establishing some other form of mitigation would be required. The difficulty with any type of engineered system is the ability to successfully commission that system and ensure it is functioning properly so as not to negatively affect local groundwater users or downgradient locations reliant on that same groundwater. Therefore, the best approach to ensure protection is to eliminate the risk of contamination altogether.

Establishing a suitable buffer zone both vertically and laterally within this gravel deposit would allow groundwater quality impacts to be remediated through natural processes before reaching the water table and affecting local receptors. With respect to a development setback, a distance of at least 1.6 kilometers from nearby domestic use water wells and important water features like Big Hill Springs and Bighill Creek is justified given the findings of Mead (1995), unless substantiated otherwise through a rigorous scientific review process. This would mean no gravel pit development in this setback area. The red outlined area in Figure 7 shows the proposed development setback area.



Figure 7. Proposed setback areas for gravel pit development to protect Big Hill Springs Provincial Park and Bighill Creek aquatic habitat.

Additionally, to provide added protection outside of the development setback, recommendations provided by Hatva (1994) indicate that maintenance of a vertical buffer of at least 4 metres of sand and gravel above the water table would allow for the natural filtration and remediation of any contaminants that may be released by peripheral operations. The recommended distance to extend this pit development constraint is an additional 1.6 kilometers (yellow outlined area in Figure 7). In order to stay 4 meters above the water table, or even 1 metre for that matter, will require a firm understanding of the historical high-water level for the location so as not to extend the gravel pit too deep. This critical determination has not been clearly defined by MALP for the area beneath their property.

5. Climate change considerations

There is concern that the impacts of climate change have not been addressed, at all, in MALP's development application. Figure 8 shows the anticipated change in temperature and precipitation conditions for the Calgary region based on output from 24 separate GCMs (General Circulation Models) provided by the Pacific Climate Impact Consortium through the Climate Atlas of Canada website²⁰.

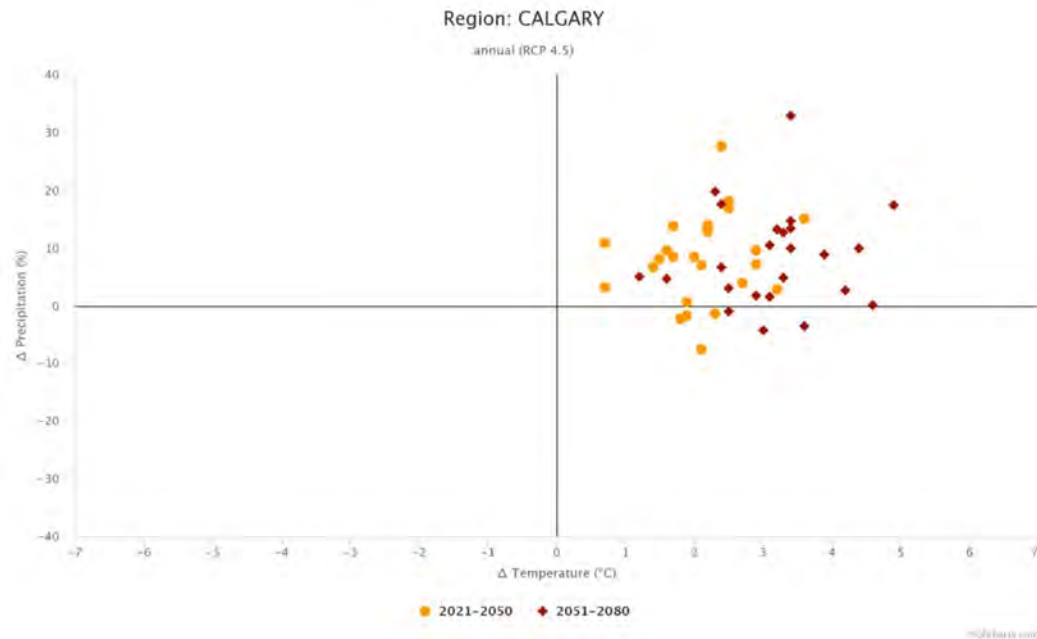


Figure 8. Anticipated change to temperature and precipitation in the Calgary region over this century (RCP 4.5 scenario)

In the majority of model cases the expectation is for an increase in precipitation anywhere from less than 5% up to as much as 35% in the coming decades. Also, a doubling of the number of days with heavy precipitation (20 mm) from 2 to 4 days is projected by the end of the century, with the extreme model cases showing up to 11 days in the latter part of this century. Convective storm activity is also expected to increase due to warmer temperatures as the ability of the atmosphere to hold water increases. Convective storms can deliver large amounts of precipitation over a short period of time and overwhelm holding pond systems if not properly designed with this in mind. Kuo et al. (2015) indicate that an overall shift in the intensity, duration and frequency, or IDF, of precipitation events in general, is expected:

*“Future IDF curves show a wide range of increased intensities especially for storms of short durations (≤ 1 -h). Conversely, future **IDF curves are expected to shift upward** because of increased air temperature and precipitable water which are projected to be about 2.9°C and 29% in average by 2071–2100, respectively.”*

²⁰ Climate Atlas of Canada

This anticipated change to hydroclimatic conditions is related to a shifting of the mean towards more extreme conditions, an increase the degree of variability, and a change in symmetry relating to the major climate drivers - temperature and precipitation. This is illustrated in Figure 9. What is obvious is that as the world continues to warm, and climate conditions shift towards a new regime, the probability of extreme events, commonly described by the 10th and 90th percentiles, will adjust as a result. Therefore, gravel pit developments with operations extending out multiple decades and leaving behind landscapes in the form of reclaimed depressional areas need to consider how projected climate change will affect their design, longevity and ultimate success in reaching stated goals and regulatory requirements.

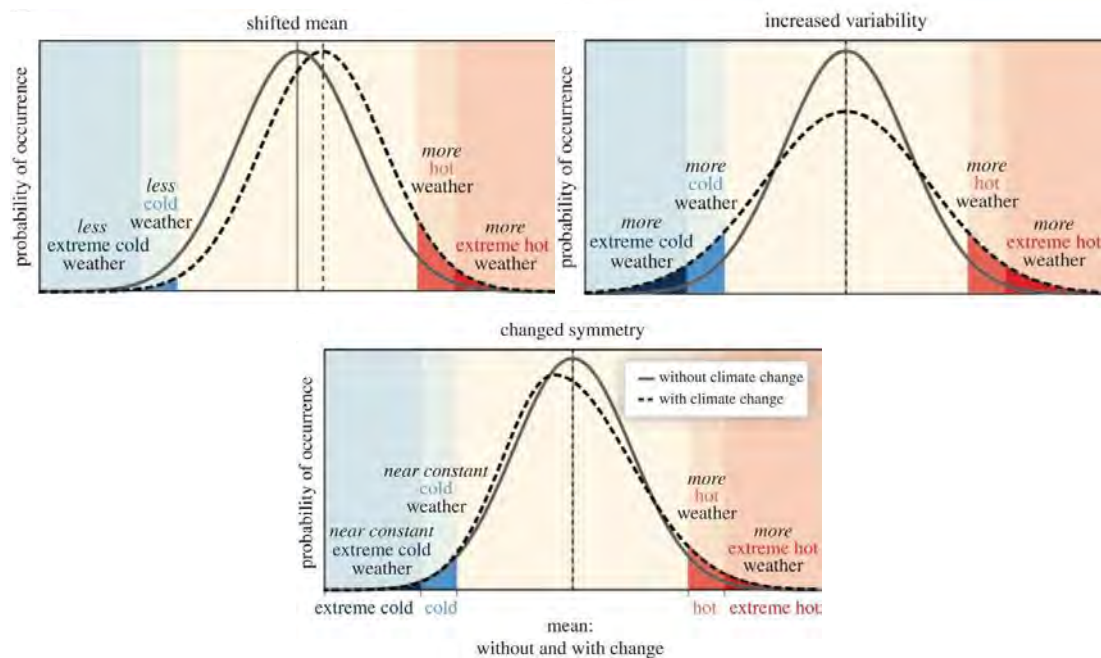


Figure 9. Example of how climate can change with a shift in mean, variability, and symmetry conditions²¹

It is my professional experience that there is a general lack of consideration for climate change in most development applications and how this might affect risk to nearby receptors. MALP's application is no different. If approved, each open pit will form a local catchment for snow melt and rainwater, thus focussing recharge into the subsurface despite all efforts to manage water out of the working areas. Ponds will need to be properly sized considering the likelihood of more extreme events, compared to current conditions, so they do not overtop and/or fail. All indications, thus far, are that normal return periods for extreme events will shorten in duration, so a 1:25-year event may become a 1:10-year event, and a 1:100 may become a 1:50, so on.

²¹ Ummenhofer and Meehl 2017

It is also unclear what effect the altered landscape will have on the local watertable under future climate conditions. For the reasons outlined in this document, the focussing of recharge caused by the excavation and removal of large amounts of sand and gravel from the MALP property will:

- i) threaten groundwater quality due to exposure of the aquifer,
- ii) reduce the thickness of the remaining sand and gravel, and the associated filtration and contaminant attenuation capacity,
- iii) increase the elevation of the water table due to enhanced recharge,
- iv) increase the risk of contaminant migration into the groundwater within the remaining sand and gravel and fractured bedrock, and
- v) increase the risk of adverse impact to systems receiving groundwater discharge from the pit areas.

Post-development, the reclamation landscape will continue to focus this recharge, but now over a broader area through disturbed till and topsoil on top of a reduce thickness of filtering material above the fractured bedrock. This may further exacerbate the delivery of soluble and particulate contaminants present in those reclamation materials, such as metals and trace elements and nutrients (nitrogen, organic carbon), into the underlying groundwater supplying local wells and the Big Hill Springs complex. Restoration of agricultural development and/or grazing will increase the risk of further contamination into the future as well.

A much higher water table due to enhanced recharge from capture of annual precipitation or large convective storms could also lead to water ponding on the surface leading to enhanced runoff, erosion risk, and increased sedimentation of downgradient areas like the Big Hill Springs and Bighill Creek. These are all considerations that MALP has failed to adequately assess, and therefore leads to an extreme risk of unintended consequences.

5. Cumulative effects

There is currently one operating gravel pit (Hillstone Aggregates) located about 850 m due west of the MALP property along Highway 567. That operation is extracting gravel from the same buried channel deposit that MALP intends to exploit. A number of other gravel mining developments have been proposed, or are under consideration, at the downstream end of this buried sand and gravel deposit and in headwater area for Big Hill Springs. This raises concerns regarding the cumulative effect that multiple pits would have on the water balance and water quality in this sand and gravel aquifer and the resulting impacts to connected aquatic features. In response to this concern, a legal challenge was presented to the Court of Queen's Bench in 2019 (Docket 1701 12053), and on September 16 of that same year the decision was made by Justice J.T. Eamon to set aside the RVC Council's decision to approve a Natural Resource Industrial (NRI) District within the west half of Section 31. This is exactly where the MALP property

resides. The County is presently appealing this court ruling, but it is understood that the lands still remain designated as Ranch & Farm (R&F) District.

The concern for cumulative development effects on the Big Hills Springs complex, and local water well owner, is the reason why the original court challenge to the RVC Land Use Bylaw was launched back in 2019. It is evident that a considerable amount of aggregate development would occur in the headwater area, and other parts of the extended sand and gravel deposit (see Figure 1, right image) should a change be made from R&F to an NRI District. It is also evident that the risk of adverse impacts from the MALP development will add to any impacts propagating from other nearby sand and gravel pits. As such, the effects of all developments regarding increased recharge and constituent mobilization into the groundwater sustaining Big Hill Springs and local users is a grave concern considering its value to the local environment.

This fact is the reason for the recommended 1.6 kilometer development setback (at a minimum, unless determined otherwise) and maintenance of a vertical 4 metre buffer above the water table for any other gravel pit developments within 1.6 kilometers of that development setback. The sole purpose of this strategy is to maintain the quality of the groundwater sustaining the springs and supporting aquatic habitat reliant on the delivery of good quality water of stable temperature. Such a development buffer will also protect the quality of groundwater for nearby households and farms reliant on water wells for their everyday needs. Given that there are plenty of gravel resources in other locations in the County and away from this sensitive headwater, establishing such a development buffer would:

- i) preserve the quality of a well-loved provincial park and prairie spring complex,
- ii) ensure that regulatory violations do not occur down the road, and
- iii) not adversely affect the potential for the County to realize aggregate levies.

To achieve sustainability (i.e. the balancing of economic and environmental consideration for societal benefit) it is important to make room for, and preserve, natural landscape features and reliant ecosystems when considering the impacts of resource development projects. This can be achieved through prudent land use planning and decision-making.

Closure

It is clear that Big Hill Springs is a unique feature in Rocky View County that serves the recreational needs of residents and visitors and provides a quiet respite for many to connect with nature or relax with family and friends. It is also frequented by wildlife. The area is located between Parkland and Foothills natural regions and contains a large complex of springs feeding a tributary creek and series of small waterfalls that flow year-round over rocky terraces (and unique tufa deposits) covered with a lush growth of shrubs and grasses. The area is also the site of an historic fish hatchery. In fact, the area is so special, and regionally

unique that the government established this as a provincial park in 1957, which received over 250,000 visitors each year.

The spring complex at the headwaters of Big Hill Springs Provincial Park is sustained by groundwater that discharges from a large, buried sand and gravel aquifer deposited thousands of years ago. These sand and gravel deposits are gaining increased attention, and pressure, to be developed as aggregate by various companies. Despite the fact there are multiple other locations in Rocky View County and the immediate region where sand and gravel aggregate can be extracted, or is already being exploited, MALP (and others) are interested in establishing pits in close proximity to Big Hill Springs Provincial Park and the headwaters of the Big Hill Springs complex.

There are definite future ramifications for this type of development when considering local groundwater users and surface water bodies that receive, and rely on, the groundwater discharging from this sand and gravel aquifer. The risks of future impacts to the local groundwater are only increased due to the cumulative pressures from multiple aggregate operations that want to establish themselves in the same area. Not only is there an issue regarding changes to groundwater quality, but there is also legal liability associated with future impacts to aquatic habitat and fish in Bighill Creek, which could trigger a series of violations related to provincial and federal Acts. Establishing a development setback of at least 1.6 kilometers, and the requirement to maintain an adequate vertical buffer of undisturbed sand and gravel above the water table of at least 4 metres for any other development within 1.6 kilometers of this development setback, would manage the risks posed to the Big Hill Springs complex and the Bighill Creek system. And, in doing this will also avoid the potential for future interventions on development applications and manage the risk of regulatory violations.

It would also be a useful exercise for the RVC to conduct an overall assessment of the county area to identify locations where a similar type of gravel pit development setback would make sense to preserve important environmental assets and reliant ecosystems. This would avoid future interventions and the time and resources spent resolving them.

Respectfully submitted by,

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Hydrogeologist & Geochemist

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TABLES

Table 1. Groundwater quality in and around MALP property (SLR 2020)

Parameters	Units	FWAL criteria	Sand & Gravel monitoring wells			Bedrock wells				Big Hill Springs		
			MW14-101	MW14-103	MW19-110	WW1	WW2	WW3	WW4			
			20-Nov-14	04-Aug-15	10-Jul-19	Median	Median	Median	Median	30-Oct-14	04-Aug-15	10-Jul-19
General quality indicators												
pH	S.U.	6.5-9.0	7.9	8.0	7.8	8.1	8.0	8.0	8.0	8.2	8.2	8.1
TDS	mg/L		337	333	290	314	317	340	330	342	334	210
Hardness (calc)	mg/L		328	316	278	310	281	333	333	336	317	200
Turbidity	NTU		9.6	8	<0.10	0.3	0.8	0.23	0.60	0.8	1.07	5.1
Major ions												
Calcium	mg/L		76	73	62	69	59	71	75	74	72	48
Magnesium	mg/L		34	33	30	33	33	38	35	37	33	20
Sodium	mg/L		6	8	6	7	13	8	7	8	8	5
Potassium	mg/L		5	4	3	3	2	3	3	3	3	5
Bicarbonate	mg/L		382	375	330	363	363	385	365	376	371	240
Chloride	mg/L	120	11	9	8	4	2	8	11	10	10	8
Sulphate	mg/L	429 or greater	9	11	8	7	16	11	7	9	8	5
Nitrate-N	mg/L	3.0	1.2	1.8	1.9	1.7	0.7	1.9	3.2	2.8	3.0	1.4
Nitrite-N	mg/L		--	--	--	--	--	--	--	--	--	--
Total metals & trace elements												
Aluminum	mg/L	0.05	0.16	0.11	10.0	0.009	0.006	0.006	0.004	0.018	0.014	0.30
Arsenic	mg/L	0.0050	0.0004	0.0003	0.0084	0.0001	0.0002	0.0001	0.0002	0.0002	0.0006	0.0006
Barium	mg/L		0.424	0.332	2.20	0.283	0.128	0.223	0.225	0.304	0.313	0.210
Boron	mg/L	1.5	--	--	--	0.022	0.028	--	0.023	0.024	<0.020	<0.020
Cadmium	mg/L	0.000340	0.000016	<0.000005	0.004200	0.000013	0.000024	0.000032	0.000024	0.000032	0.000008	0.000034
Chromium	mg/L	0.001 (assume 6+)	--	0.002	0.019	--	--	--	0.001	--	--	0.001
Copper	mg/L	0.040	--	0.0013	0.032	0.022	0.002	0.065	0.006	--	0.0010	0.0013
Iron	mg/L	0.300	0.28	0.22	10.0	0.015	0.029	--	0.018	0.03	0.02	0.25
Lead	mg/L	0.007	0.000	--	0.019	0.001	0.001	0.003	0.001	--	--	--
Mercury	mg/L	0.000005	--	--	0.000002	--	--	--		--	--	0.000003

Parameters	Units	FWAL criteria	Sand & Gravel monitoring wells			Bedrock wells				Big Hill Springs		
			MW14-101	MW14-103	MW19-110	WW1	WW2	WW3	WW4			
			20-Nov-14	04-Aug-15	10-Jul-19	Median	Median	Median	Median	30-Oct-14	04-Aug-15	10-Jul-19
Manganese	mg/L		0.020	0.010	7.300	--	0.004	0.001	0.004	0.0019	0.0012	<0.0040
Molybdenum	mg/L	0.073	0.001	0.001	0.002	0.001	0.002	0.001	0.001	0.0014	0.0009	0.0004
Nickel	mg/L	0.120	--	0.001	0.065	--	0.001	0.002	0.001	--	<0.00050	0.0009
Selenium	mg/L	0.002	--	0.001	0.001	0.001	0.001	0.001	0.001	0.002	0.001	0.001
Thallium	mg/L	0.0008	--	--	0.0002	--	--	--		--	--	--
Uranium	mg/L	0.015	0.002	0.002	0.006	0.001	0.001	0.002	0.001	0.0020	0.0019	0.0013
Zinc	mg/L	0.030	--	--	0.140	--	0.035	0.205	0.041	--	--	--
Microbiological												
Total coliforms	MPN/100		-	<1	180	<1	<1	<1	6	-	2420	>2400
E.coli	MPN/100		-	<1	63	<1	<1	<1	<1	-	1733	1600

Notes:

- Parameters highlighted in red indicate concentrations above published FWAL criteria (AB government 2018)
- Average hardness of 250 mg/L (as CaCO₃) used for determining metals and trace element guidelines, as required.
- FWAL = freshwater aquatic life

Table 2. Bighill Creek water quality: 2019-2020 (Fouli 2020)

Sampling Location	Units	FWAL criteria	SITE 1 - upstream of Big Hill Springs at Hwy 567			SITE 2 – near confluence of Big Hill Springs and Bighill Creek		
			Median	Min	Max	Median	Min	Max
General quality indicators								
pH		6.5-9.0	8.1	7.8	8.3	8.1	8.0	8.5
TDS	mg/L	--	310	180	490	330	210	370
Hardness (as CaCO ₃)	mg/L	--	280	160	430	280	180	340
Selected ions								
Sodium	mg/L	--	20	11	31	15	11	17
Chloride	mg/L	120	9.8	7.8	23	9.0	5.7	15.0
Sulphate	mg/L	429 or greater	13	7	28	13	10	14
Nutrients								
Nitrate (as N)	mg/L	3.0	0.077	0.027	.033	3.3	0.84	9.2
Total Phosphorus	mg/L	--	<0.10	<0.10	<0.10	0.10	<0.10	0.120
Total metals & trace elements								
Aluminum	mg/L	0.050	0.055	0.031	0.440	0.053	0.017	0.160
Arsenic	mg/L	0.0050	0.0010	0.0007	0.0013	0.0009	0.0002	0.0011
Barium	mg/L	--	0.165	0.120	0.260	0.200	0.130	0.280
Boron	mg/L	1.5	0.018	<0.02	0.026	0.010	<0.020	0.023
Cadmium	ug/L	0.034	0.010	<0.010	0.039	0.026	0.010	0.037
Chromium	mg/L	0.0010 (assume 6+)	0.0005	<0.0010	0.0013	0.0005	0.0005	0.0012
Copper	mg/L	0.040	0.0005	0.0004	0.0015	0.0007	0.0003	0.0009
Iron	mg/L	0.0300	0.410	0.240	0.830	0.240	0.170	0.580
Lead	mg/L	0.0070	0.0001	<0.0001	0.0004	0.0001	<0.002	0.0002
Manganese	mg/L	--	0.026	0.014	0.220	0.015	0.011	0.047
Molybdenum	mg/L	0.0730	0.0010	0.0003	0.0012	0.001	0.000	0.001
Nickel	mg/L	0.110	0.0008	0.0006	0.0012	0.0006	<0.0003	0.0011
Potassium	mg/L	--	5.0	3.8	7.1	4.1	3.5	6.0
Selenium	mg/L	0.0020	0.0005	0.0004	0.0013	0.0008	0.0005	0.0015

Sampling Location	Units	FWAL criteria	SITE 1 - upstream of BHS at Hwy 567			SITE 2 - confluence of BHS and Bighill Creek		
			Median	Min	Max	Median	Min	Max
Silicon	mg/L	--	4.9	2.2	8.4	4.4	3.1	7.3
Strontium	mg/L	--	0.555	0.320	0.820	0.500	0.360	0.560
Sulphur	mg/L	--	4.7	3.0	7.8	2.9	2.7	5.0
Titanium	mg/L	--	0.003	0.002	0.013	0.001	0.001	0.005
Uranium	mg/L	0.0150	0.003	0.002	0.003	0.002	0.001	0.003
Vanadium	mg/L	--	0.001	<0.001	0.002	0.002	0.002	0.002
Zinc	mg/L	0.030	0.003	0.002	0.005	0.004	0.004	0.004

Notes:

- Parameters highlighted in red indicate concentrations above published FWAL criteria (AB government 2018)
- Average hardness of 250 mg/L (as CaCO₃) used for determining metals and trace element guidelines, as required.
- BHS = Big Hill Springs; FWAL = freshwater aquatic life

APPENDICES

Jon Fennell. M.Sc., Ph.D., P.Geol.

PROFESSIONAL PROFILE

Dr. Jon Fennell has been a practicing consultant in the natural resource sector for over 30 years offering support in the environmental sciences and resource management. His experience includes contaminated sites assessment, development of local and regional-scale groundwater systems, mine dewatering strategies, water supply and disposal, groundwater-surface water interaction assessment, implementation of monitoring and management systems, climate analysis and adaptation strategies, and environmental forensics including applications of:

- i) remote sensing
- ii) downhole, earth-based and airborne geophysical methods
- iii) geochemical assessment & modelling
- iv) stable and radiogenic isotopes to support source water tracing, chemical fingerprinting, and age-dating

The bulk of Jon's experience is associated with various oil & gas and mineral resource development projects in Canada and abroad. Over the last 13 years Jon has worked closely the Alberta Government through various initiatives to support the Water for Life Strategy, Land Use Framework, and Cumulative Effects Management System in the province. A primary area of focus is on developing strategies to ensure water security and communicating the importance of water knowledge as it applies to sustainable development activities.

PROJECT EXPERIENCE

International support

United Nations – Joint Caribbean Climate Change Partnership

Technical lead for the development of UNFCCC-sanctioned National Adaptation Plans for the countries of Belize and Guyana, with the goal of addressing multi-sector impacts from future climate change. Responsibilities included review of existing policies and studies supporting climate change adaptation, assessment of current adaptation plans for major economic, social, and environmental sectors, Incorporation of IPCC model results under various RCP scenarios, delivery of facilitated in-country workshops for various ministries, provision of recommendations to address gaps identified in current plans, liaison with government officials and UNDP organizers, completion of risk assessment and options analysis to identify high-value actions, preparation of capacity-building plan and 10-yr strategic plan, and risk and vulnerability assessment (including spatial aspects under various climate change scenarios – SRES and RCP).

Mexican Soda and Water Company – Monterrey Mexico

Lead for a groundwater evaluation project to supplement beverage making operations a large manufacturing plant in the city of Monterrey. Responsibilities included review of background geological, hydrogeological and geochemical information across a large study area centered on the Monterrey Metropolitan Area; assessment of structural fabric of study area including presence of major folds, faults, and other features (e.g. karst), amalgamation of background data with result from Quantum Geoelectrophysics reconnaissance program to identify prospective drilling targets, completion of a 4C

report (compare, contrast, correlate, confirm) and selection of prime drilling target for testing and evaluation.

Dept. of Environment & Resource Management – Coal Seam Gas Development, Queensland Australia

Lead for a hydrogeochemical assessment and water fingerprinting exercise in Great Artesian Basin aquifers of the Surat and Bowen basins to support Coal Seam Gas development and cumulative effects analysis. Responsibilities included a comprehensive data and information inventory to facilitate source water fingerprinting and collation of large public-domain data sets to provide a first-of-its-kind database of water quality information, review of major ions, metals and trace elements, stable and radiogenic isotopes and dissolved gases to identify recharge phenomenon, cross-formational flow characteristics and distinct water types, and statistical analysis to assess data groupings and spatial trends.

Additionally, lead for an aquifer vulnerability assessment to assess groundwater and groundwater-dependent ecosystem risks from Coal Seam Gas development in southeast Queensland. Responsibilities included development of a multi-criteria weighting and ranking system linked with GIS to display areas of highest risk to drawdown including areas users and groundwater dependent ecosystems, and facilitation of industry and government workshops to present and vet results.

Origin Energy – Coal Seam Gas Development, Queensland Australia

Groundwater lead for a large-scale coal seam gas project (up to 10,000 wells) located in the headwaters of the Murray-Darling Basin and recharge area for the Great Artesian Basin. Responsibilities included, development of a regional-scale groundwater monitoring system using vulnerability and risk mapping, design of a hydrogeological model covering a 173 000 km² area (using FEFLOW) to assess cumulative effects from coal seam gas development, completion of supporting Technical Report (including risk mapping, injection feasibility, model development) and Environmental Impact Statement chapter, and liaison with the Queensland Department of Environment and Natural Resources to address needs for the required Environmental Impact Assessment.

Texas Petroleum Company – Hydrocarbon Development, Columbia South America

Completion of an onsite environmental assessment of oilfield operations in support of the transfer of the Teca Nare, Cocorná, Velásques Oil Fields and the Velásquez-Galan Pipeline. Responsibilities included phase 1 site assessment of field operations, verification of site conditions at all well sites including soil and vegetation conditions prior to property transfer, assessment of baseline surface water and groundwater chemical conditions, as wells as environmental quality assessment to determine contamination from oilfield operations, and provision of summary report including recommendations.

Texas Petroleum Company – Hydrocarbon Development, Ecuador South America

Completion of a baseline groundwater and surface water study in a remote and environmentally sensitive area of the Amazon basin (headwaters area) to support a helicopter-assisted drilling program for oil and gas exploration. Responsibilities included field reconnaissance to establish the suitability of proposed drilling targets, assessment of the suitability of local surface water and groundwater sources for drilling fluid provision (quality and quantity), review of baseline soil quality, site hydrogeology, and geochemical conditions, and development of recommendations for pit construction and site preparation.

Canadian International Development Agency – Municipal works, Ecuador South America

Completion of a baseline soil and groundwater study (physical and chemical) around the City of Catamayo to determine the feasibility of siting an engineered wastewater impoundment for the treatment

of municipal sewage treatment (project funded by CIDA). Responsibilities included general site reconnaissance, collection of soil and groundwater samples for baseline geochemical quality assessment, review of hydrogeological conditions and processes relating to baseline conditions, and submission of recommendations on the suitability of the proposed location and possible approaches to rectify existing limitations.

Government of Yemen – National water supply, Yemen

Hydrogeological and geochemical support for a regional-scale study of water supply potential in the country. Responsibilities included hydrogeological and hydrogeochemical facies mapping, geochemical assessment and flow path evolution modelling, groundwater flow field assessment and modelling, sustainable yield evaluation, and groundwater age dating.

Blackbird Mine – Acid Rock Drainage assessment, Idaho USA

Completion of a hydrogeological baseline study and associated stable isotope investigation ($\delta^{34}\text{S}$, $\delta^{18}\text{O}$, and $\delta^2\text{H}$) to determine the source of acid mine drainage near active underground workings.

Responsibilities included review of existing geochemical data and related mineral equilibria conditions (i.e. baseline and impacted), and assessment of geochemical reactions leading to ARD conditions, including biogeochemical aspects.

Government support

Alberta Environment, Oil Sands Science and Monitoring Division

Preparation of oil sands tailings pond seepage review report. Responsibilities included review of background information pertaining to oil sands produced water (OSPW) seepage research and natural bedrock groundwater discharge studies, review of industry-submitted EPEA compliance reports to assess current “state of affairs” regarding monitoring and OSPW detections, assessment of seepage management systems, review of geological pathways for OSPW migration, and development of seepage risk profiles for all active tailings ponds.

Alberta Environment and Parks (AEP)

Provision of external expert review for the Implementation Directive for the Surface Water Body Aggregate Policy (SWBAP). Responsibilities included review of relevant Government of Alberta documents relating to aggregate mining in or near surface water bodies and/or floodplain environments, use of information from relevant policies in other jurisdictions as well as studies and research (aquatic, terrestrial, river morphology, climate risk) regarding impacts of aggregate mining in floodplain areas, identification of gaps regarding goals and objectives of the approval and management process, review of risk assessment approach to approving aggregate mines near surface water bodies, and provision of recommendations for monitoring, evaluating and reporting, and interaction with AEP project team members and presentation of results.

Also, participation on expert hydrogeology panel to development a template for groundwater management frameworks (GMFs) in Alberta. Responsibilities included assessment of background on Alberta groundwater resources and documents highlighting existing GMFs inside and outside of Canada, review of sustainability goals and challenges with groundwater management (quantity and quality), review of prevailing concepts to groundwater management (i.e. surface water capture, risk and vulnerability assessment), identification of data needs and required infrastructure to support cumulative effects management, identification of proposed indicators using DPSIR approach, and participation in

external panel and internal AEP team of hydrogeological experts to define aspects of a standardized GMF template.

Alberta Environmental Monitoring Evaluation and Reporting Agency (AEMERA)

Assessment of Alberta's groundwater observation well network, including redundancy and gap analysis. Responsibilities included groundwater risk mapping, development of a numerical scoring scheme to prioritize monitoring wells, statistical and spatial analysis of provincial water chemistries using information from the Alberta water well information database, and development of monitoring strategy including analytes and frequency to address key development activities (e.g. hydraulic fracturing, waste disposal, large-scale groundwater extractions).

Alberta Environment (AENV)

Various projects include:

- Assistance with scoping, conceptual design and development of approach to Groundwater Management framework template
- Expert review for Implementation Directive for the Surface Water Body Aggregate Policy
- Review and comment on Groundwater Monitoring Directive (2012 draft)
- Technical assistance with development of a guidance framework to respond to the implications of thermal mobilization of constituents at in-situ bitumen recovery projects including facilitation of team workshops to communicate the physical and chemical aspects of thermal mobilization and the risks posed by in-situ operations, development of a risk-based, phased, approach to assessing thermal mobilization to address source-pathway-receptor aspects, development of a draft guidance document and interaction with the AEP communications team, and support for industry and CAPP consultation meetings to review the draft guidance document.
- Completion of vulnerability and risk mapping for the Lower Athabasca Regional Planning area and development of groundwater management framework for the mineable and thermal in situ areas.
- Completion of an inventory of existing quality and quantity issues, water supply conditions and related environmental policy.
- Participation in technical and policy-related work sessions involving various stakeholder representatives.
- Assessment of potential cumulative effects from thermal in-situ bitumen recovery operations and related activities (i.e. water withdrawal for steam generation; fluid waste injection)
- Facilitation of technical and policy-related work sessions to engage stakeholders (operators, AENV and ERCB) directly affected by changes to provincial water management.

Alberta Environment and Sustainable Resource Development (ESRD)

Various projects include:

- Development of a multi-attribute point-scoring system and ArcGIS tool to assist with optimal siting of provincial monitoring wells to address concerns regarding hydraulic fracturing (HF). Responsibilities included identification of key risks to groundwater resource from HF activities, conceptualization and construction of a subsurface risk assessment, and identification of surface access opportunities in an ArcGIS platform to identify prime locations for monitoring in active and future development areas.

- Northern Athabasca Oil Sands Region groundwater monitoring program. Responsibilities included development of sampling methodology, data evaluation process and program logistics, communication to technical team comprising oil sands operators, ERCB and AEP representatives, development of an on-line visualization tool, and client liaison.
- Review of LARP management plan, supporting Groundwater Management Frameworks and supporting guidance documents re: Thermal Mobilization of Trace Elements during In Situ Developments and Groundwater Monitoring Directive.
- Preparation of summary document for Scientific Advisory Committee of the Oil sands GW working group, and Alberta Environment.

Alberta Land Use Secretariat (LUS)

Assistance with development of land planning scenarios in NE Alberta to guide future development in the Lower Athabasca Regional Plan area pursuant to the goals of the Alberta Land-use Framework. Responsibilities included presentations to the Land Use Secretariat, Regional Planning Team and Regional Advisory Council, development and assessment of modelled results from a cumulative effects simulator, completion of groundwater modelling over a 93 000 km² area (using MODFLOW), and development of an approach to deal with groundwater resources in the LARP area.

Alberta Utilities Commission (AUC)

Provision of expert review support for a wind power application in the Provost AB area. Responsibilities included review of project concept and environmental implications, assessment of completeness regarding baseline hydrogeological assessment, assessment of impact analysis and proposed mitigation, identification of gaps and provision supplemental information requests.

BC Ministry of Energy, Mines and Petroleum Resources

Provision of expert review support for hydraulic fracturing review process. Responsibilities included preparation of background information pertaining to water quality risks and source-pathway-receptor aspects of hydraulic fracturing operations, provision of recommendation regarding geochemical fingerprinting (ion ratios, isotopes, NORMs), risk assessment and mapping techniques, and monitoring, and appearance at in-camera session to discuss water quality aspects with academic panel members including recommendations.

Agency support

Alberta Innovates (AI)

Provision of hydrogeological support services for the following University of Alberta research studies:

- Resolving human versus Industrial Influences on the water quality of the Lower Athabasca River (data synthesis; geophysical and geochemical assessment; isotope geochemistry source water fingerprinting, GW-SW interaction – identification and flux)
- Review of Arsenic in Alberta's groundwater (collation of multiple open source and private data bases, GIS platform design; correlation/cluster/factor analysis to determine source/cause/reasons(s), both physical and geochemical, for elevated concentrations, development of a risk mapping tool to identify existing and potential future high-risk areas and aquifer intervals)
- Predicting Alberta's Water Future (complete estimates of groundwater recharge to Alberta's 2200 sub-basins; determining groundwater use projection by major sector to 2050; assessing baseflow contributions and groundwater stress area based analytic model outputs; project changes to provincial

water supplies based on population growth, energy extraction, food production, land use, and climate variability/change; coordinate results with climate change model outputs and SWAT model outputs to generate preliminary Water Risk map for the province.

Alberta Water Research Institute (AWRI)

Preparation of a report assessing Alberta's inventory of water and its associated dynamics (natural and human-induced). Responsibilities included the development of a partnership model including participants from Universities and Institutes in Beijing, Switzerland, Edmonton, Calgary and Lethbridge, completion of a complete inventory of surface water, groundwater and fossil water (glaciers and deep groundwater) to identify current and future risks to water supplies in the province, and assessment of climate variability and change implications to provincial groundwater water resources

Canada's Oil Sands Innovation Alliance (COSIA)

Completion of a tailing pond seepage risk assessment and preparation of a peer-review journal manuscript to place suspected oil sands impacts into perspective. Responsibilities included review of individual tailings ponds established at the various operating oil sands mines in the Athabasca Oil Sands region, application of source-pathway-receptor model in relation to calculated groundwater flow velocities, stand-off distances from receptors, and natural attenuation properties to assess risk associated with each structure, and preparation of manuscript to place into context natural discharge of low-quality groundwater from bedrock formation versus oil sands seepage.

Other projects include:

- Completion of regional geochemical assessments in NE Alberta (35,000 km² area) supporting the Regional Water Management Initiative. Responsibilities included, collation of regional geological, hydrogeological, and geochemical data using public domain and industry information, assessment and interpretation of hydrogeological setting and of conceptual models, assessment of traditional and isotope geochemistry to determine source water chemistry to define flow path phenomena areas of aquifer interactions, statistical analysis of data to determine groupings and associations (PCA analysis), and documentation and presentation of results at various public venues.
- Completion of a water disposal assessment in NE Alberta (153,000 km² area) supporting the Regional Water Management Initiative. Responsibilities included collation of regional geological, hydrogeological, and water production data using public domain and industry information, development of a multi-criteria analysis approach to assessing Injection Potential and Theoretical Injection Rates based on a system of weighted and ranked physical and chemical attributes, and development of an ArcGIS platform to identify high-value disposal formations in relation to existing and planned in situ developments and pipelines
- Completion of oil sands industry study assessing the risks and benefits of landfills, salt caverns and disposal wells in liquid waste management. Responsibilities included participation in industry workshops. assessment of liquid waste management options, documentation and presentation of the results to industry members.

Cumulative Environmental Management Association (CEMA)

Assessment of baseline hydrological and hydrogeological conditions and development of a regional-scale groundwater quality monitoring network (18 000 km² study area) located in the Athabasca Oil Sands Region of northeast Alberta. Responsibilities included refinement of conceptual hydrogeological model, groundwater-surface water interaction assessment, assessment of quality conditions and trends (including statistical analysis), knowledge and data gap analysis, pathway identification and vulnerability assessment

for sensitive receptors, field reconnaissance and well selection, isotope interpretation ($\delta^{18}\text{O}$, $\delta^2\text{H}$, $\delta^{13}\text{C}$, Carbon-14), groundwater hydrograph analysis, report preparation and presentation, and liaison with government and industry representatives.

Other projects include:

- Preparation of a groundwater monitoring and management plan in support of the State of the Muskeg River Watershed report. Responsibilities included assessment of baseline groundwater quantity and quality conditions in the study area, identification of development stresses and potential short and long-term impacts, identification of proposed physical, chemical and state indicators for monitoring, and interaction in multidisciplinary team.
- Overview of historical, current, and planned groundwater initiatives in the Regional Municipality of Wood Buffalo. Responsibilities included interviews with relevant industry, government, academia, aboriginal, and non-governmental organization groups, identifying and accessing relevant studies, reports, and investigations relating to groundwater and groundwater-surface water interaction, and development of a useable database with relevant descriptors of content and results.

Lakeland Industry and Community Association (LICA)

Assessment of the current health of two large watersheds (covering over 8500 km²) in response to changing climatic conditions, changing land use practices, and increased pressure on water resources (surface water and groundwater) by agricultural and industrial users. Responsibilities included the assessment of historical Landsat imagery, review of stream and groundwater hydrograph data, assessment of effects of climate phenomena on basin hydrology, development of a hydrogeological framework from over 11,500 water well records, and review of temporal quality data from lakes and water wells.

Petroleum Technology Alliance of Canada (PTAC)

Completion of studies and industry workshops assessing environmental net benefit of saline water use versus non-saline water use in unconventional oil and gas development and the role of collaboration in unconventional oil and gas development.

Municipal and Watershed Stewardship Groups

Butte Action Committee

Preparation for, and participation in, AEP-led Surface Water Body Aggregate Policy 2017 stakeholder review workshops. Responsibilities included consultation with stakeholder group, provision of support for Leduc workshop, review of AEP materials in advance of Airdrie workshop (AEP policies, guides, codes, risk assessment framework), review of other Canadian and International policies and guides to aggregate mining near water bodies, review of impact studies related to aggregate mine development near surface water bodies (erosion, pit capture, infrastructure risk, fisheries and riparian area impacts), assessment of climate change implications for streamflow timing and magnitude, as well as intensity, duration, and frequency of storms and related runoff, on 1:100 levels, and documentation of questions to AEP for clarification and response to AEP questions re: climate change implications.

Red Deer River Watershed Alliance (RDRWA)

Assistance with development of an Integrated Watershed Management Plan to address future development in the basin. Responsibilities included assessment of aquifer types and groundwater inventory, water use patterns, effects of land use and climate variability/change on basin storage, assessment of water quality conditions, risk and vulnerability analysis, development of beneficial

management practices, and development of a conceptual monitoring system to achieve plan goals and objectives.

South McDougall Flats Protection Society, Sundre AB

Review of proposed re-zoning for aggregate mine development in historic floodplain of Little Red Deer River in Sundre, AB. Responsibilities included review of proposed gravel pit re-zoning area, air photo assessment and delineation of paleo-floodplain. preparation and presentation of workshop materials at public forums re: pros and cons of gravel mining (including policy framework review), and support for Town Council hearing.

Town of Okotoks, AB

Assistance with review of development applications and support for ensuring water security through conjunctive use strategies. Responsibilities included expert review of development applications assessing cumulative drawdown effects and provision of recommendations to manage effects, engagement with Town official on development of a sustainable water management strategy, and provision of support for AENV and Environmental Appeal Board process.

Also, completion of a pre-feasibility study to assess aquifer storage and recovery (ASR) and managed aquifer recharge (MAR) as a solution to water supply challenges. Responsibilities included review of regulatory setting and constraints for ASR and MAR (Canada and international jurisdictions), review of ASR and MAR projects world-wide, assessment of local geological and hydrogeological conditions and identification of potential areas to facilitate ASR and MAR success, modelling to determine optimal placement of MAR system to enhance baseflow conditions, groundwater-surface water interaction assessment, and preparation and presentation of pre-feasibility summary to Town Council and Mayor.

Town of High River, AB

Lead for the development of a Water Sustainability Plan predicated on risk identification and alternative storage and management options for a large alluvial aquifer system. Responsibilities included concept and program design, execution of vulnerability mapping approach to assess risk to High River from groundwater impacts (e.g. underground storage tanks), development of conceptual hydrogeological framework, review of groundwater-surface water interaction and climate variability effects, assistance with groundwater model development, and liaison with town officials, MD Foothills official and other project stakeholders.

Tsuu't'ina First Nation

Completion of flood analysis for the Redwood Meadow development on the Elbow River floodplain. Responsibilities included review of river hydrology, flood frequency, and related changes in river morphology, assistance with hydrological modelling to address groundwater flooding potential to existing and planned development areas, calculation of damage estimates associated with 5-, 20-, 100-, 200- and 500-year return periods, and liaison with First Nations representatives, Government of AB, and Canadian Environmental Assessment Agency.

Industry support

Alberta Energy Company (AEC)

Preparation of an Environmental Operations Manual for all aspects of petroleum exploration and development in Alberta. Contents of the manual included environmental procedures for seismic outline

provision and reclamation, siting and construction of drilling leases and processing facilities, siting and construction of pipeline right of ways, spill response and cleanup, and site reclamation.

Amoco Canada

Various projects include:

- Numerous gas plant and batter investigations, including the completion of geophysical surveys (EM38, EM31, and EM61), and the design, installation, testing and sampling of groundwater monitoring networks.
- Completion of environmental site assessments and landfill delineation programs for gas plant divestitures. Responsibilities included installation, testing and sampling of groundwater monitoring wells, completion of soil sampling programs, and assessment of the results to determine the liability cost associated with property transfer.
- Completion of a stable isotope study using $\delta^{34}\text{S}$, $\delta^{18}\text{O}$, $\delta^2\text{H}$, $\delta^{13}\text{C}$ to determine the source of anomalous groundwater sulphate concentrations (natural vs. anthropogenic), and review of fresh groundwater usage for steam injection. Responsibilities included assessment of historical monitoring well and lake level readings to evaluate local effects resulting from groundwater withdrawal.
- Sounding Lake area monitoring program to determine effects from nearby drilling activity. Responsibilities included interviews with well-owners, assessment of the water delivery system, short-term aquifer testing, sample collection using ultra-clean sampling methods, evaluation of the data, and communication of results to client and owner.

Apache Canada

Completion of watershed analysis and intake siting in support of a Water Act Application on Smoky Lake. Responsibilities included assessment of Smoke Lake watershed and water supply potential, water supply modelling to determine availability and reliability of lake water, review of historical flow data and determination of suitable IFN at outlet (i.e. Q80), review of terrestrial, fisheries and water quality data to support water diversion strategy, development of proposed monitoring and response plan, and liaison with AEP and AER representatives.

Bellatrix Exploration Ltd.

Completion of a Water Sourcing study for Rocky Mountain asset. Responsibilities included review of existing and potential water sourcing options, development MCA and of GIS tool to assess and map high-value water opportunities, and completion of a corporate water security plan.

BP Canada

Resident well sampling program to determine effects from nearby drilling programs and existing gas wells. Responsibilities included well-owner interviews, assessment of the well conditions and water delivery system, sample collection using ultra-clean sampling methods, and communication of results.

Canadian Occidental

Completion of a stable isotope studies to determine the source of sulphate impact from two large sour gas processing facilities (Balzac and Okotoks). Responsibilities included drilling, installation, and testing of monitoring wells, development of a conceptual site model, review of site-wide geochemistry (soil and groundwater), and application of $\delta^{34}\text{S}$, $\delta^{18}\text{O}$, $\delta^2\text{H}$, and $\delta^{13}\text{C}$ isotopes to resolve natural versus anthropogenic influences.

Devon Canada

Various projects include:

- Development of a thermal mobilization risk model to support development efforts in the Jackfish and Pike oil sands developments. Responsibilities included review and evaluation of existing geochemical data including metals and trace elements, development of conceptual site model using existing geological picks for various identified formations, design of Spatial MCA approach to map risk of thermal mobilization from artificial ground heating, and preparation of summary document and presentation at various public venues.
- Completion of detailed studies to define baseline hydrogeological and hydrological conditions in support of a CBM project in the Crowsnest Region of the eastern Rocky Mountains. Responsibilities included, completion of detailed field reconnaissance program, establishment of a spring and water well monitoring network, investigation of surface water/groundwater interactions, development of a conceptual hydrogeological framework in a mountainous area using geological and geochemical data, groundwater age dating of regional confined aquifers using radioactive isotopes (i.e. Tritium and Chlorine-36), and public and regulatory liaison.
- Hydrogeological support for D51 disposal application. Responsibilities included refinement of conceptual model and identification of hydrodynamic conditions supporting disposal water entrapment by stagnation zone using geochemical and isotope evidence.

Enerplus

Completion of a Water Security Plan for the Western Canadian assets. Responsibilities included review of asset operations and water management process, assessment of basin water risk conditions and current mitigations in place, source water and disposal opportunity assessment, and development of multi-criteria assessment (MCA) process to rank water risk profile of each asset and provide recommendations for mitigation.

Graymont Western US Inc.

Preliminary development of a mine dewatering and water management strategy for a large limestone quarry located in the eastern front ranges of the Rocky Mountains. Responsibilities included assessment of baseline hydrogeological and hydrogeochemical conditions in a mountain environment, source water fingerprinting and groundwater age-dating, fracture and lineament analysis using structural geology and geophysical analysis (GPR, borehole tele-viewer), groundwater-surface water interaction assessment (i.e., Bow River), conceptualization of dewatering strategy utilizing oriented and horizontal well technology, and issues identification and risk analysis.

Hammerhead Resources

Completion of watershed analysis, flood assessment and intake siting in support of a Water Act Application on the Smoky River. Responsibilities included assessment of Smoky River watershed and water supply potential, review of historical flow data and assessment of Q80 and Q95, flood assessment to determine 1:10 and 1:25 year event levels, review of fisheries and bank stability assessment in support of intake siting, development of proposed monitoring and response plan, and liaison with AEP and AER representatives.

Husky Oil Operations Ltd.

Completion of a water security plan for the Ansell asset, west-central Alberta. Responsibilities included review of project water profile and future requirements for hydraulic fracturing, facilitation of risk review

workshop, and review of water source opportunities and development of MCA opportunity ranking process.

Also, completion of a Water Security Plan for a 200,000 barrel per day thermal in situ oil sands operation. Responsibilities included, review of water supply and disposal needs for the duration of the planned project, risk and opportunity analysis using multi-criteria analysis to ensure viability of supply and disposal strategies, and identification of strategies to ensure project viability and project sustainability.

Imperial Oil

Various projects include:

- Completion of field and bench-scale tests to determine facilitated mobility of metals, trace elements, and dissolved organics resulting from artificial ground heating around thermal in situ wells. Responsibilities included drilling, installation, testing, and sampling (soil and water) from 22 deep (up to 90 m) monitoring wells at a newly established thermal in situ pad to determine baseline geochemistry and groundwater flow directions, tracer experiment to determine groundwater flow velocities in a deep (>80 m) confined aquifer, collection of sediment samples (under anoxic conditions) for bench-scale heating experiments to determine metals mobility and related kinetics, review of stable isotopes in groundwater and dissolved gases to determine effects of heating from in-situ thermal wells on local geochemical conditions (inorganic and organic constituents), reaction path modelling to determine processes influencing changes metals concentrations and biological activity resulting from subsurface heating, determination of activation energies for metals release, and the role of biogeochemical reactions in facilitating metals release, transport and fate modelling to determine the long-term risk of thermal mobilization of metals (and other related constituents) to the surrounding environment, and documentation of result and liaison with client and regulatory agencies.
- Design and implementation of dewatering program for large process water ponds. Responsibilities included review of site geological conditions, installation of dewatering wells, acquisition and interpretation of aquifer test data, design of dewatering system using appropriate theoretical calculations and analytical modelling solution, and development of dewatering plan and associated performance monitoring
- Completion of a regional groundwater investigation and development of a regional-scale ground water monitoring network (per EPO 95-07 requirements) in a multi-layer inter-till aquifer system in east-central Alberta. Responsibilities included assessment and interpretation of Quaternary stratigraphy, interpretation of seismic line data and geophysical borehole log analysis, regional groundwater flow mapping, geochemical facies mapping, assessment of regional arsenic concentrations, trends, and potential connection to thermal in situ development activities, groundwater age-dating and stable isotope analysis ($\delta^{18}\text{O}$, $\delta^2\text{H}$, $\delta^{34}\text{S}$, $\delta^{11}\text{B}$ and $\delta^{13}\text{C}$: dissolved constituents and gases), preparation of investigation report to address EPO questions (i.e. source and cause of groundwater quality issues), and liaison with regulators during investigation and EPO closure process.
- Completion of an environmental liability assessment to determine the cost of decommissioning, abandoning and restoring the area currently occupied by the Norman Wells field. Responsibilities included completion of a Phase 1 audit of production facilities and supporting infrastructure (i.e. wellheads, pipelines, satellites, batteries and former refinery), design and implementation of a late Fall field program to sample a statistically sufficient number of locations to generate realistic liability costing for field shutdown and closure, generation of a summary report, and assistance with design of liability costing model and summary reporting.

- Completion of numerous isotope studies used to determine groundwater flow rates in regional confined aquifers and the source of anomalous groundwater quality conditions and dissolved gas concentrations near a large heavy oil recovery operation using assessment of $\delta^{18}\text{O}$, $\delta^2\text{H}$, $\delta^{34}\text{S}$, $\delta^{11}\text{B}$ and $\delta^{13}\text{C}$ and Tritium and Carbon-14 for groundwater age-dating.
- Tritium age dating of groundwater in Norman Wells, NWT to determine vertical groundwater flow characteristics in discontinuous permafrost environment
- Development and implementation of a site characterization program at a former refinery and battery (circa 1930s) located approximately 160 km south of the Arctic Circle. Responsibilities included the design and installation of a monitoring network in discontinuous permafrost, and assistance in development of assessment programs to generate Tier II criteria in support of a human health and ecological risk assessment.
- Support for re-licensing of supply wells for oilfield injection using Alberta Environment “Water Conservation and Allocation Guideline for Oilfield Injection” and “Groundwater Evaluation Guideline.” Responsibilities included, completion of field-verified surveys, review of site geological conditions, acquisition and interpretation of aquifer test data, assessment of groundwater/surface water interaction, and determination of long-term sustainable yield using analytical solutions
- Hydrogeological lead for a large oil sands mine EIA (Kearl Oil Sands Mine Project). Responsibilities include evaluation and interpretation of water well information and chemical data, defining Quaternary stratigraphy, temporal water level assessment to determine potential impact to regional groundwater quality and quantity arising from mine development and dewatering, and support at Joint Panel hearing.
- Cold Lake area monitoring program (Arsenic Investigation – 30 private residents). Responsibilities included interviews with well-owners, assessment of the water delivery system, sample collection using ultra-clean sampling methods, review of the data, and communication of results to client, well owner and Alberta Environment
- Completion of an environmental liability assessment and costing exercise in support of the sale of the Judy Creek field to PenGrowth Corp. to statistically sample a sufficient number of facilities to generate realistic liability cost for property transfer. Responsibilities included completion of Phase 1 audits of production facilities and supporting infrastructure (i.e. wellheads, pipelines, satellites, and batteries), design and implementation of winter field program to sample facilities to generate realistic liability cost for property transfer
- Conceptual model design for dewatering scheme in support of mine development. Responsibilities included assessment of geological conditions, boundary assessment, parameter selection and optimization, and assessment of model results
- Completion of a groundwater modelling study to determine the sustainable yield of a major deep freshwater aquifer in the Cold Lake area. Responsibilities included the provision of hydrogeological support for model conceptualization and design, input parameter selection, and evaluation and communication of results
- Development and implementation of a regional groundwater quality monitoring network covering an area of 1,200 km². Responsibilities included, regular interaction with environmental regulatory agencies and the local landowners, installation, testing and sampling of deep (up to 230 m) monitoring wells to assess potential impact to confined aquifers due to production well casing failures, design, implementation and interpretation of aquifer tests in support of groundwater remediation programs, and development of cost effective approaches towards restoring water quality conditions in deep aquifers influenced by heavy hydrocarbons and associated production fluids.

- Preparation of an AB environment approved Incident Response Plan to deal with groundwater quality issues identified during routine monitoring activities at a large heavy oil recovery scheme. Responsibilities included design of a cost-effective sampling schedule including rationalization of a 200 well monitoring network to provide a meaningful network of approx. 100 wells, and development of statistical limits for response and mitigation actions.

Japan Canada Oil Sands (JACOS)

Execution of hydrogeological section of an expansion EIA for the Hangingstone Thermal In Situ Oil Sands project. Responsibilities included development of baseline hydrogeology, EIA sections, and SIR responses, liaison with project team and governing agencies, and stakeholder consultation with First Nations and 3PC.

Also, completion of a water supply project in support of a heavy oil recovery scheme using Alberta Environment “Water Conservation and Allocation Guideline for Oilfield Injection” and “Groundwater Evaluation Guideline.” Responsibilities included assessment of geophysical logs and EM survey results, design and implementation of field programs, step rate test and constant rate test data acquisition and analysis, well screen selection and well design, well efficiency assessment, and use of pertinent analytical equations to predict effect of long-term pumping.

Mobil Oil Canada

Completion of a stable isotope study to determine the source of sulphate impact from a large sour gas processing facility. Responsibilities included, drilling and installation of monitoring wells, development of a conceptual site model, review of site-wide geochemistry (soil and groundwater), and application of $\delta^{34}\text{S}$, $\delta^{18}\text{O}$, $\delta^2\text{H}$, and $\delta^{13}\text{C}$ isotopes to resolve natural versus anthropogenic influences.

Nexen ULC

Development of a water strategy to service the Aurora LNG project/Dilly Creek asset. Responsibilities included assessment of development trajectory with respect to water use, identification of feasible water supply source to accommodate up to 6.5 million m^3 per year of water, conceptualization of water storage strategy to reduce pressure on local water sources and minimize physical footprint of development, development of a water conveyance strategy utilizing existing rights of way, including Class 5 cost estimation, and liaison with Fort Nelson first Nations to facilitate development of baseline hydrology monitoring program and facilitation of a Section 10 water licence (following successful EAB appeal of previous licence).

Also, the design and completion of bench-scale testing to determine the mobilization of metals and trace elements under applied heating. Responsibilities included conceptual design of experimental process in collaboration with AGAT lab representatives, assessment of frozen core samples and selection of appropriate intervals for physical (grain size, mineralogy via XRD) and chemical testing (total metals, leachable metals), assessment of results from sequential batch heating experiments extending from 5-100°C for metals species released to solution, geochemical modelling of kinetic experiment results to determine activation energies of metals release, completion of attenuation experiments to determine potential for mobilized metals to re-associated with sediments under cooled conditions, and preparation of suitable documentation to present to the client and AER.

Pembina Pipeline Corporation

Provision of expert legal support to review source and cause of industrial chemical contamination at an operating gas plant. Responsibilities included review of existing site investigations, procedures, and documentation, assessment of efficacy of investigations and protocols (field and laboratory), development

of conceptual model to explain presence and movement of sulfolane in bedrock deposits, and review of risk assessment findings and provision of recommendations to close data and information gaps.

Petro-Canada

Various projects include:

- Completion of detailed regional and local baseline studies, and cumulative impact assessment, to establish regional and local hydrogeological and geochemical characteristics in support of a 30,000 bbl/d heavy oil recovery expansion (MacKay River Project). Responsibilities included defining Quaternary stratigraphy, temporal water level assessment to determine potential impact to regional groundwater quality and quantity arising from bitumen recovery operations, development of a numerical groundwater model to assess long-term effects of water withdrawal and waste disposal to support project activities, and completion of climate change assessment formed part of the assessment for project design.
- Conceptualization and design of field program to assess water supply and water disposal for two major heavy oil projects (>30,000 bbl/d). Responsibilities included selection of drilling locations based on geophysical reconnaissance, implementation of field programs, step rate test and constant rate test data acquisition and analysis, well efficiency assessment, well screen selection and well design, and use of pertinent analytical equations.
- Review of fresh groundwater use for a water flood project. Responsibilities included interpretation of historical monitoring well data to determine the effects of the groundwater withdrawal from the local aquifer.
- Assessment of long-term effects of industrial water supply wells used for a water flood scheme. Responsibilities included a review groundwater chemistry and well hydraulic data to determination sustainable production rates.
- Completion of an environmental operations audit and subsequent industrial landfill delineation to determine the source area of possible groundwater contamination. Responsibilities included completion of a comprehensive intrusive landfill delineation and soil sampling program to determine the extent and volume of landfill contamination.
- Completion of an industrial landfill delineation project to determine possible sources of groundwater contamination. Responsibilities included completion of a magnetometer survey, follow-up excavation and soil sampling near a decommissioned landfill to determine the presence, extent and volume of residual landfill material.

Procor

Review of operational history of a salt cavern storage facility including an assessment of groundwater quality near the large brine storage ponds and the potential for impact to the Regina Aquifer.

Shell Canada

Various projects include:

- Completion of watershed analysis and intake siting in support of a Water Act Application on Iosegun Lake. Responsibilities included assessment of Iosegun Lake watershed and water supply potential, water supply modelling to determine availability and reliability of supply, review of historical flow data and determination of suitable IFN at outlet (i.e. Q80), review of terrestrial, fisheries and water quality data to support water diversion strategy, development of proposed monitoring and response plan, and liaison with AEP and AER representatives.

- Hydrogeological support for Jackpine Mine Expansion EIA
- Development of Groundwater Management Plan and annual monitoring support at Shell's Muskeg River Mine. Responsibilities included review of site-wide groundwater monitoring network for applicability to EPEA Approval requirements (including gap analysis, routine monitoring and reporting per EPEA requirements, selection of indicator suites to facilitate routine monitoring, evaluation, and reporting, identification of locations with water quality concerns, development of approach to statically assessing and responding to data excursions and trends, and preparation of the GMP for consideration and acceptance by AEP.
- Support for Carmon Creek EIA and assessment of brackish water supply potential in support of heavy oil operations in the Peace River area. Responsibilities included assessment of baseline hydrogeological conditions and potential impacts from project development, preparation of climate change assessment for project development, support for SIR submissions and EIA team interactions, feasibility assessment of potential for deep formations to produce sustained supplies and conceptual well-field development, and liaison with regulatory agencies
- Development of a regional-scale ground water monitoring network in a multi-layer aquifer system in the Peace River region of Alberta. Responsibilities included assessment of Quaternary stratigraphy, interpretation of seismic line data, geophysical borehole log analysis, and geochemical facies mapping and solution chemistry analysis.
- Assistance with the development and construction of an induced infiltration groundwater supply system for the Shell Caroline Gas Plant industrial water supply project. Responsibilities included drilling and installation of large diameter water production wells, borehole geophysical logging and interpretation. sand quantification testing and analyses to determine sediment production volumes prior to pipeline construction, and liaison with client and local landowners.

Suncor Energy

Various projects include:

- Lead subsurface specialist for a multi-criteria decision analysis and life-cycle value analysis in support of a regional brine management strategy in the Athabasca Oil Sands area. Responsibilities included development of a holistic weighting and ranking approach to address triple-bottom-line assessment of treatment and disposal options for liquid and solid waste streams originating from oil sands mining and in situ assets located across a 30 000 km² area, facilitation of, and participation in, workshops to assess viable options for treatment and disposal including Class 4 costing, and development of a constraints mapping approach (vulnerability, risks and opportunities) using ArcGIS to assist in management and disposal options for liquid and solids waste streams.
- Development of an Athabasca River reconnaissance program to identify and sample natural groundwater-surface water interaction zones discharging waters from the Cretaceous and Devonian formations. Responsibilities included planning/execution and interpretation of a marine-based geophysical program using EM31 imaging and bathymetric readings, development of pore water sampling program including geochemical assessment of waters and source fingerprinting (major ion, trace element, dissolved organics, and stable and radiogenic isotopes), interpretation of results and presentation at various venues (government, industry).
- D51 disposal monitoring at the Firebag Thermal In Situ Project
- Thermal mobilization assessments (Firebag, Lewis, Meadow Creek)
- Development of brine water management strategy including options analysis and Class 4 costing

- Preparation of an oil sands mining closure strategy outlining goals, objectives, tasks, timelines, and consulting and research agencies to execute in support of Life of Mine Closure and Reclamation process
- Assistance with Fort Hills Operational Plan regarding preservation of McClelland Lake and wetland complex; review of physical hydrogeology and geochemical setting; assessment of numerical model design and output; review of cut-of wall design and mitigation system; review of adaptive management processes
- Review of Devonian – McMurray interactions at the North Steepbank mine expansion and assistance with investigation program design (including geochemical assessment)
- Completion of geophysical and porewater surveys on the Athabasca and Steepbank Rivers to determine contributions of natural discharge versus industry inputs
- Review of existing water supply for Steepbank and Millennium mine operations and development of contingency supply options. Responsibilities included review of past water resource evaluations, development of geophysical investigation program and interpretation of results, assessment of contingency water supply (groundwater and operations water), client consultation and liaison with Alberta Environment, and implementation of horizontal well technology to provide a secure supply of water for continued operations
- Groundwater age-dating and source area identification in support of active tailings pond seepage investigations. Responsibilities included conceptual site model design, review of traditional geochemistry to determine end-point water types, and application of Tritium, $\delta^{18}\text{O}$, $\delta^2\text{H}$, $\delta^{34}\text{S}$, $\delta^{11}\text{B}$ to resolve geochemical setting and potential areas of seepage
- Preparation of an AB Environment approved Groundwater Management Plan at a large oil sands mining operation. Activities included, the design of a cost-effective sampling schedule including rationalization of over 300 wells to establish a meaningful monitoring network of 150 wells, development of statistically established trigger values for response and mitigation, and liaison with Government of Alberta during review and approval.

Synchrude Canada

Participation on expert hydrogeology panel to review Devonian investigation program for Aurora mine and assess mitigation strategies to control high risk areas (Les Gray - UBC, Carl Mendoza, - UofA, Ken Baxter - Golder, Jon Fennell - WP). Responsibilities included review of existing baseline data for active mining site, identification of high-risk areas to consider for future investigation and monitoring, participation in group workshop settings to communicate findings and accumulate input for recommendations refinement, and participation in internal panel meetings to discuss concepts and develop final recommendations.

Teck Resources Limited

Evaluation of stream response to groundwater interception in support of fisheries habitat offsetting at Line Creek Mine, BC. Responsibilities included baseline reconnaissance of Line Creek alluvial system and GW-SW water interactions with Line Creek, assessment of area springs, shallow groundwater, and creeks to determine geochemical quality and flow conditions (using drive point well technology and data logger systems), completion of ground penetrating radar survey to map thickness and morphology of alluvial deposits, water quality fingerprinting using major ion, trace elements (in particular selenium) and stable isotopes to determine interaction of groundwater environment with Line Creek, and assessment of selenium mobilization conditions related to active mine workings and development of a conceptual (passive) mitigation strategy to offset impacts to fisheries habitat.

Total E&P

Support for Joslyn North Mine EIA submission and development of a mine dewatering strategy for. Responsibilities included development of baseline hydrogeology, EIA sections and SIR responses , liaison with project team and governing agencies, joint Panel hearing support.

Also, selection and phasing of depressurization wells and associated monitoring wells, review of deep well injection potential, including geochemical compatibilities of waters, development of a performance monitoring system, selection of pipeline route, and preparation of a design-based memorandum with related costs (Class 3) of implementation and long-term operation.

Various Gas Plants, Batteries and Refineries (Alberta, British Columbia, Saskatchewan)

Completion of piezometer network design at numerous operating facilities to assess the potential impact to local groundwater quality resulting from industrial activities and extent of contaminant migration from known source areas (Imperial Oil, Shell, Mobil, Canadian Occidental); and, provision of hydrogeological services in support of a gas plant decommissioning (ongoing). Responsibilities include, well installation, testing and sampling, involvement in a site-specific risk assessment (ecological and human health), development of sampling protocols, and assessment of cost-effective remediation techniques to address various contaminant situations in both soil and groundwater.

Various Oil and Gas Facilities (Alberta, Saskatchewan)

Completion of environmental operations audits and development of waste management plans for numerous operating oil and gas facilities (Amoco, Petro-Canada, Shell). Responsibilities included review of historical operations files (spill reports, waste handling procedures, EUB and AENV records), completion of site inspections and interviews, and historical air photo analysis and interpretation.

EDUCATION

Ph.D. (Geochemistry) – University of Calgary, 2008

M.Sc. (Physical Hydrogeology and Isotope Geochemistry) – University of Calgary, 1994

B.Sc. (Geology: hard rock, sedimentology, mineralogy, structural, geochemical) – University of Saskatchewan, Saskatoon, 1985

REGISTRATIONS & AFFILIATIONS

APEGA (P.Geol. – Alberta)

EGBC (P.Geo. – British Columbia)

APEGS (P.Geo. P.Eng. – Saskatchewan)

NAPEG (P.Geol. – Northwest Territories and Nunavut)

National Ground Water Association (NGWA)

International Association of Hydrogeologists

Canadian Water Resources Association (CWRA)

Sustainable Energy Development Program (Univ. of Calgary) – External Advisory Board – 2017 to present

Bow River Basin Council (Calgary), Board of Directors (2008-2013), Chair of Monitoring and Modelling committee (2008 to 2012), Member of Legislation and Policy Committee (2006-2011), Member of Integrated Watershed Management Group (2007 to 2010)

SPECIFIC TECHNICAL EXPERTISE

- ICP-MS, GC-MS, Ion chromatography (LC-MS, HPLC, IC)
- SEM, XRD (bulk and clays), XRF, EDS and Synchrotron Light (XANES, and EXAFS)
- Isotope ratio mass spectrometry (IRMS)
- Solid-phase extraction, Alumina fraction, and sequential soil extraction
- Toxicity identification evaluation for metals and organics
- Selection of appropriate inorganic or organic analytical techniques based on Standard Methods for Water and Wastewater
- Statistical analysis (e.g. population testing, trend analysis, control charting, PCA, HCA, spatial analysis)
- Multi-criteria decision analysis (MCDA)
- Vulnerability and risk mapping
- Risk assessment (human and ecological)
- Climate tele-connections assessment, climate model analysis and impact identification, development of adaptation strategies

PUBLICATIONS

Fennell J. and Aciszewski T (2019). Current knowledge of seepage from oil sands tailings ponds and its environmental influence in northeastern Alberta. *Science of the Total Environment*, 686, p. 968-985.

Birks S.J., **Fennell J.W.**, Gibson J.J., Yi Y., Moncur M.C., and Brewster M. 2019. Using regional datasets of isotope geochemistry to resolve complex groundwater flow and formation connectivity in northeastern Alberta, Canada. *Applied Geochemistry*, 101 (2019), p. 140-159.

Hatala R., **Fennell J.**, and Gurba G. 2018. Advances in the realm of Hydrogeophysics: The emerging role of Quantum Geoelectrophysics in Aquifer Exploration. *Can. Soc. of Expl. Geoph., RECORDER October Focus - Hydrogeophysics: the Past, Present, and Future*. Vo. 43, No. 6, p. 32-36.

Birks S.J., Moncur M.C., Gibson J.J., Yi Y., **Fennell J.**, and Taylor E.B. 2018. Origin and hydrogeological setting of saline groundwater discharges to the Athabasca River: Characterization of the hyperheic zone. *Applied Geochem.*, 98, p. 172-190.

Fennell J., 2018. Predictions, perceptions and the precautionary principle: responding to climate change in a realm of uncertainty. *Canadian Water Resources Association, Water News, Fall/Winter 2018*. Vo. 37, No. 2, p. 6-9.

Fennell J., 2018. *Water, Peace, and Global Security: Canada's Place in the World We Want* (Sandford and Smakhtin, eds.), *Groundwater and Canada's Future – Moving data and information to knowledge and security*. Prepared for the United Nations University, Institute for Environment, Water and Health, 17 pp.

Fennell J. 2018. *Poison Well: Chasing arsenic in Alberta's groundwater*. Water Canada, January/February 2018, p. 20-21.

- Fennell J.** 2017. Let's make a deal: Canada's vital role in the Columbia River Treaty. *Water Canada*, September/October 2017. p. 42-43.
- Faramarzi M., K. Abbaspour, V. Adamowicz, W. Lu, **J. Fennell**, A. Zehnder and G. Goss 2017. Uncertainty based assessment of dynamic freshwater scarcity in semi-arid watershed of Alberta, Canada. *Journal of Hydrology: Regional Studies*, 9, p. 48-68.
- Fennell J.** 2015. Disposal in the unconventional oil and gas sector: Challenges and solutions. American Assoc. of Petroleum Geologists, *Environmental Geosciences*, Vol. 22, No. 04, December 2015, p. 127-138.
- Fennell J.** and O. Keilbasinki 2014. Water, food, and our climate: Is California a harbinger of things to come? *WaterCanada*, July/August 2015, p. 24-25.
- Fennell J.** and O. Keilbasinki 2014. Water without Borders: What is Canada's role in water security? *WaterCanada*, November/December 2014, p. 50-51.
- Gibson J.J., **J. Fennell**, S.J. Birks, Y. Yi, M. Moncur, B. Hansen and S. Jasechko 2013. Evidence of discharging saline formation water to the Athabasca River in the northern Athabasca oil sands region. *Canadian Journal of Earth Sciences*, 50, p. 1244 - 1257.
- M.S. Ross, A.S. Santos Pereira, **J. Fennell**, M. Davies, J. Johnson, L. Sliva, and J.W. Martin 2012. Quantitative and Qualitative Analysis of Naphthenic Acids in Natural Waters Surrounding the Canadian Oil Sands Industry. *Environmental Science and Technology*, 46, p. 12796 – 12805.
- Fennell J.** 2011. Total Water Management – a new and necessary paradigm. *Environmental Science and Engineering Magazine*, May/June edition.
- Fennell J.**, Klebek M. and Forrest F. 2011. An approach to managing cumulative effects to groundwater resources in the Alberta Oil Sands. World Heavy Oil Congress proceedings, March 2011.
- Fennell J.** 2010. Protecting water supplies in CSG development. *Water Engineering Australia*, Vo. 4, No. 6, September 2010.
- Fennell J.** 2008. Effects of Aquifer Heating on Groundwater Chemistry with a Review of Arsenic and its Mobility. Ph.D. thesis, Department of Geoscience, University of Calgary.
- Fennell J.** Zawadzki A. and Cadman C. 2006. Influence of natural vs. anthropogenic stresses on water resource sustainability: a case study. *Water Science and Technology*. Volume 53, No. 10, p 21-27.
- William L.B., M.E. Wieser, **J. Fennell**, I. Hutcheon, and R.L. Hervig 2001. Application of boron isotopes to the understanding of fluid-rock interactions in a hydrothermally stimulated oil reservoir in the Alberta Basin, Canada. *Geofluids*, Vol. 1, p. 229-240.
- Kellett R., **J. Fennell**, A. Glatiotis, W. MacLeod, and C. Watson 1999. An Integrated Approach to Site Investigations in Permafrost Regions: Geophysics, Soils, Groundwater, and Geographical Information Systems. ARCSACC Conference, Edmonton '99.
- Gilson E.W., R. Kellett, **J. Fennell**, P. Bauman, and C. Sikstrom 1998. High Resolution Reflection Seismic and Resistivity Imaging of Deep Regional Aquifers for Stratigraphic Mapping. CSEG Conference.

Fennell J. and Bentley L. 1997. Distribution of Sulphate and Organic Carbon in a Prairie Till Setting: Natural versus Industrial Sources. *Water Resources Research*, Vol. 34, No. 7, p. 1781-1794.

Fennell J. and Sevigny J. 1997. Effects of Acid Conditions on Element Distribution Beneath a Sulphur Base Pad (Acid Mobilization Study). Publication submitted to the Canadian Association of Petroleum Producers (CAPP).

Fennell J. 1994. Source and Distribution of Sulphate and Associated Organics at a Sour Gas Plant in Southern Alberta. M.Sc. thesis, Department of Geology and Geophysics, University of Calgary. Hayes B., J. Christopher, L. Rosenthal, G. Los, B. McKercher, D. Minken, Y. Tremblay, and

J. Fennell 1994. *Atlas of the Western Canadian Sedimentary Basin – Chapter 19: Cretaceous Manville Group*. Canadian Society of Petroleum Geologists and Alberta Research Council, ISBN 0-920230-53-9.

PRESENTATIONS & LECTURES

COSIA Oil Sands Innovation Summit, June 2019 Calgary AB: Fact or fiction – the truth regarding tailings pond seepage in Canada's oil sands (response to a Free Trade Agreement Challenge)

CWRA Alberta Branch conference, April 2019 Red Deer: Flooding, climate change, and the need for a precautionary approach.

University of Calgary, Sustainable Energy Development Program. February 2019, Decision support processes and tools in sustainable energy development projects.

Mine Water Solutions, June 2018. Total Water Management: Canada's contribution to sustainable mine development.

Canadian Water Resources Association, April 2018, Red Deer, AB. Arsenic and Alberta's Groundwater: the where and why.

Southern Alberta Institute of Technology (water Initiative), February 2018, Calgary AB. Risky business: understanding Alberta water security

Canadian Society of Unconventional Resources (CSUR), January 2018, Calgary AB. Managing through nature's extremes: ensuring water security for successful UCOG operations.

SEAWA, Nov 2017, Medicine Hat AB. Hydrology of riparian areas: the need for protection and preservation.

CWRA National Conference, June 2017, Lethbridge AB. Climate change, the Columbia River Treaty, and considerations for a successful re-negotiation.

Thermal mobilizations and the regulatory response, May 2017, Calgary AB. CHOA forum.

National Ground Water Association, March 2017, Denver CO. Advances in the realm of hydrogeophysics: the role of Quantum Geoelectrophysics in groundwater exploration

Haskayne School of Business IRIS series, Feb 2017. Following the molecules: the importance of water to Canada's future.

BRBC-CEAC, Feb 2017, Cochrane AB, GW-SW interaction and the implication for development in riparian lands.

Watertech, April 2017, Banff AB. Arsenic in Alberta's Groundwater: the where and why; Isotopes and Geochemistry:

National Ground Water Association, Hydrogeophysics for deep groundwater exploration, March 2017, Denver CO. Advances in the realm of Hydrogeophysics: the role of Quantum Geoelectrophysics in Groundwater Exploration

Haskayne School of Business CPC IRIS seminar series, February 2017, Calgary AB. Following the molecules: the importance of water in Canada's future.

Bow River Basin Council/Cochrane Environmental Action Committee Collaborating for Healthy Riparian Lands Engagement Workshop, February 2017, Cochrane AB. Groundwater-Surface water interaction and the implications of human development in riparian lands.

Watertech, April 2016, Banff AB. Predicting Alberta's Groundwater Future & An Integrated Approach to Resolving Complex Hydrogeological Settings.

Canadian Water Resources Association (CWRA), April 2016, Edmonton AB. Natural discharge and its role in Athabasca River water quality.

Canada's Oil Sands Innovation Alliance (COSIA) Water Forum, March 2016, Calgary AB. Natural discharge and its role in Athabasca River water quality.

Canadian Association of Petroleum Geologists (CSPG), March 2016, Calgary AB. Climate, water availability, and the success of Western Canada's Energy Development & Natural discharge and its role in Athabasca River water quality.

Underground Injection Control (GWPC), February 2016, Denver CO. Disposal in the unconventional oil and gas sector: challenges and solutions.

AGAT Environmental Series, Jan/Feb 2016. Calgary and Edmonton, AB. Climate, water availability and the success of Western Canada's energy industry.

International Water Conference, November 2015, Orlando FL. Disposal in the unconventional oil and gas sector: challenges and solutions.

Chemistry Industry Association of Canada, October 2015, Edmonton AB. Water Sustainability: and its importance to successful industry.

EnviroAnalysis, July 2015, Banff AB. Thermal mobilization and Arsenic: implication for the oil sands.

WaterTech, April 2015, Kananaskis AB. Smart Monitoring to address challenges of Unconventional Gas development and an approach to mapping risk related to thermal mobilization of constituents.

Canadian Water Resources Association, April 2015, Red Deer AB. Water, Energy and Canada's Future (keynote address)

Underground Injection Council, February 2015, Austin TX. Monitoring to address challenges of Unconventional Gas development (invited speaker)

National Ground Water Association, Groundwater monitoring for Shale Gas developments workshop, November 2014, Pittsburgh PA. Smart monitoring to address the challenges of Unconventional Gas Development (invited speaker)

Canadian Water Resources Association, June 2014, Hamilton ON. Water disposal in the Oil Sands: challenges and solutions and What is Water Security and Why is it Important.

Water Management in Mining, May 2014, Vancouver BC. Total Water Management: a necessary paradigm for sustainable mining.

CSPG GeoConvention May 2014, Calgary AB. Water disposal in the Oil Sands: challenges and solutions; Placing the risk of thermal mobilization into perspective; What is Water Security and Why is it Important?

WaterTech, April 2014, Banff AB. Water disposal in the Oil Sands: challenges and solutions and Placing the risk of thermal mobilization into perspective.

Canada's Oil Sand Innovation Alliance (COSIA), March 2014, Edmonton AB. Water disposal in the Oil Sands: challenges and solutions and Placing the risk of thermal mobilization into perspective.

International Assoc. of Hydrogeologists, GeoMontreal 2013, October 2013, Montreal QC. The role of subsurface heating in trace element mobility.

Oil Sands Heavy Oil Technology 2013, July 2013, Calgary AB. The role of subsurface heating in trace element mobility.

Watertech, April 2013, Banff AB. The role of subsurface heating in trace element mobility.

International Assoc. of Hydrogeologists World Congress 2012, September 2012, Niagara ON. Session Chair for Hydrogeological Issues in the Oil Sands and presenter: i) Oil Sands overview – economic and environmental setting; ii) Framing groundwater vulnerability in the oil sands: an approach to identify and discern; and iii) Climate: a driving force affecting water security in the oil sands

Water in Mining 2012, June 2012, Santiago Chile. Total Water Management: a necessary paradigm for sustainability.

BCWWA 2012 Annual Conference, April 2012, Penticton BC. The role of inventory, dynamics, and risk analysis in water management: a case study.

WaterTech, April 2012, Banff AB. Plenary Session. Bringing context to the oil sands debate: understanding the role of nature and its environmental effects.

BCWWA Hydraulic Fracturing Workshop, Fort St. John BC, March 2012. Keynote address: Striking a Balance – water resource management versus economic development (keynote address).

CONRAD 2012, March 2011, Edmonton AB. Bringing context to the oil sands debate: understanding the role of nature and its environmental effects.

Alberta Irrigation Projects Assoc., November 2011, Lethbridge AB. Managing what we have: a review of Alberta's water sources, volumes and trends (invited speaker).

Alberta Innovates Technology Talks, November 2011, Calgary AB. Dynamics of Alberta's Water Supply: a review of supplies, trends and risks.

Red Deer River Watershed Alliance Annual General Meeting, October 2011, Red Deer AB. Water in the Red Deer: volumes, patterns, trends and threats.

Land and Water Summit, October 2011, Calgary AB. Total Water Management: a necessary paradigm for water security.

CEMA Groundwater Working Group, June 2011, Fort McMurray AB. Groundwater in the oil sands: facts, concepts and management processes.

CWRA Alberta / Alberta Low Impact Development Annual Conference, April 2011, Red Deer AB. A Review of Alberta's Water Supply and trends.

WaterTech, April 2011, Banff AB. Managing what we have: a review of Alberta's water supply.

World Heavy Oil Congress 2011, March 2011, Edmonton, AB. An approach to managing cumulative effects to groundwater resources in the Alberta Oil Sands.

Engineers Australia, August 2010, Brisbane Qld. CSG development in Australia: an approach to assessing cumulative effects on groundwater (invited speaker).

Joint IAH/AIG meeting, July 2010, Melbourne Vic. Assessing the effects of coal seam gas development on water resources of the Great Artesian Basin (invited speaker).

18th Queensland Water Symposium, June 2010, Brisbane Qld. A cumulative effects approach to assessing effects from coal seam gas development on groundwater resources (invited speaker).

WaterTech, April 2010, Lake Louise AB. Regional Groundwater Monitoring Network Implementation: Northern Athabasca Oil Sands Region.

University of Calgary, December 2009, Calgary AB. What's happening to our water? A review of issues and dynamics.

CSPG Gussow Conference, October 2009, Canmore AB. Water sustainability in the Alberta Oil Sands: managing what we have (invited speaker).

Bow River Basin Council, Legislation and Policy Committee Groundwater Licensing Workshop, March 2009, Calgary AB. Groundwater: the hidden resource

BlueWater Sustainability Initiative, January 2009, Sarnia ON. Planning approaches and forensic tools for large-scale regional monitoring initiatives.

CWRA Technical luncheon session, October 2008, Calgary, AB. Water sustainability in a growing Alberta.

Bow River Basin Council, September 2008, Calgary AB. Basin Monitoring and Management Approaches.

IAH/CGS GeoEdmonton08, Edmonton AB. Coordinator and Chair of Groundwater Development Session.

North American Lake Management Society (NALMS) 2008, Lake Louise AB, Coordinator and Chair of Climate Change Effects to Lakes, Reservoirs and Watersheds section.

EcoNomics™ Luncheon, May 2008, Calgary AB. Water Sustainability in the Hydrocarbon Industry.

WaterTech, April 2008, Lake Louise AB. Effects of climate and land cover changes on basin water balances.

CWRA Annual Conference, April 2008, Calgary AB. Role of climate change and land cover on water supply sustainability.

Bow River Basin Council, March 2007, Calgary AB. Forest Hydrology and the effects of Climate Change.

ALMS/CWRA, October 2006, Lethbridge AB. Reservoir Maintenance Workshop. Climate tele-connections and their effects on basin water supplies

Bow River Basin Council, June 2006, Calgary AB. Groundwater sustainability: the invisible resource (Climate change and basin sustainability)

Engineering Institute of Canada, May 2006, Ottawa ON. CCC2006 Land use and climate change effects at the basin scale.

International Water Association, Watershed and River Basin Management Specialists Group Conference, Calgary, AB, 2005. Basin Water Management Strategies.

Burgess Shale Geoscience Foundation, August 2004 and 2005, Field BC. Water in a Changing Climate: understanding and adapting.

C-CAIRNS, October 2005, Victoria BC, Climate and Fisheries Impacts, Uncertainty and Responses of Ecosystems and Communities, Effects of Climate and the PDO on Hydrology of a Major Alberta Watershed.

North American Lake Management Society, November 2004, Victoria BC. Climate Change and Effects on Water Resources.

Canadian Institute Conference, June 2004, Calgary AB. Water Management Strategies for the Oil and Gas Industry: The challenge and approach

Canadian Society of Petroleum Geologists, Gussow Conference, March 2004, Canmore AB. Understanding the Effects of Natural and Anthropogenic Forcings on Basin Water Resources.

Alberta Environment and EUB, April 2003, Elk Point AB. Climate and Land Use Change Effects on Basin Water Resources in the Lakeland Region - East-central Alberta.

Joint CGS/IAH Conference, June 2001, Calgary AB. A Multidisciplinary Approach to Resolving Complex Hydrogeologic Systems.

Aquatic Toxicity Workshop, October 1996, Calgary AB. Use of site characterization and contaminant situation ranking to focus a risk assessment evaluation at a decommissioned sour gas plant and associated landfill.

Joint GAC/MAC Conference, April 1995, Waterloo ON. Use of geochemical modelling and stable isotopes to determine the source of groundwater quality impacts near a sour gas processing facility.

Joint GAC/MAC Conference, Edmonton AB, 1994. Assessment of depression-focused recharge as a mechanism for variable groundwater and soil chemistry.

GasRep Conference, Calgary AB, 1994. Use of stable isotopes to determine the source of water quality impacts near a sour gas processing facility.

Michelle Mitton

From: Joy West-Eklund [REDACTED]
Sent: Tuesday, February 9, 2021 1:26 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - BylawC8051-2020

Follow Up Flag: Follow up
Flag Status: Completed

Do not open links or attachments unless sender and content are known.

Dear Council Members

As a residents of Rockyview County, (not of Bearspaw) and concerned citizens, we wish to register our firm opposition to this proposal by Mountain Ash to develop a gravel pit ("Summit Pit") .

The proximity to Big Hill Springs Provincial Park and Creek should be reason enough!

Situating a gravel pit with potentially profound environmental impact there would be clearly irresponsible.

Sincerely
Joy and Lindsay Eklund

Sent from my iPhone

Michelle Mitton

From: Ken Mattie [REDACTED]
Sent: Tuesday, February 16, 2021 9:28 AM
To: Legislative Services Shared
Subject: [EXTERNAL] - opposition to bylaw C-8051-2020
Attachments: Ken Mattie RVC Summit Opposition.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

submitted by
Ken Mattie (signature on file)
11 Big Hill Creek estates
Feb 16 2021

To Rocky View County
please find attached my personal views and reasons why i am opposed to bylaw C-8051-2020 commonly referred to as
the Summit gravel pit

Thank you for the opportunity to voice my concerns

Respectfully
Ken Mattie

Ken Mattie
11 Big Hill Creek Estates

Dear Rocky View Council

Re PL202000031 (06731002/4)

I am strongly opposed to this development commonly referred to as the Summit Gravel Pit!

I have resided in Rocky View County for 27 years within Big Hill Creek Estates, a community directly north of the proposed gravel pit. I have seen many changes in Rocky View County (RVC) over the 27 years including the Monterra development, the shell gas station and campground, industrial development on 567, and yes, the development of one gravel pit (now called Hillstone). For the most part, I felt RVC has done a good job with the implementation of those projects.

However, I have a great deal of concern over the direction RVC is heading with respect to the methodology used to approve these gravel pits.

It appears to me that this is an addendum to the first request back in 2014 and this request will double the size of the land holding for this previously proposed pit.

Although the documents provided in 2014 indicate (Section 8.0 Developing a concept plan through community input) Summit says that they have reached out to the community to the "greatest extent possible". I have never heard from them. Significantly more meaningful consultation should have occurred with affected residents. And for that reason, I am opposed to this application

I believe RVC is working on a revised Aggregate Resource Plan (ARP). They should certainly consider using different methodologies and insisting on expert independent peer review of any and all applications provided by, and paid for, by the developers. Until such time as this Aggregate resource plan is completed, I suggest a moratorium on any new gravel development.

Now I would like to address some things in the Summit pit application that I found concerning.

With respect to Groundwater

As for groundwater, the community of Big Hill Creek Estates now lies within the 1.6 km radius of the new application. We are a community of 15 residences and we share a community water well where we draw our water from the Paskapoo formation. There is a large amount of evidence that suggests open pit gravel mining can have a negative impact on ground water and the aquifers they sit on top of. When I review the Scott pit application and a peer review document submitted by Ailsa Le May P. Geo submitted

Jan 19/2021, she concluded that the hydrogeological study put forth for that proposal was unworthy of credit and reliance. They also sit on top of the Paskapoo Formation. I would expect at the very least the RVC would commission a peer review of the Hydrogeological study.
Until this has been completed, this application should be rejected.

In the SLR project #203.50065.00002 report from 2016 they state "the underlying hydrological and hydraulic principles of the rainfall runoff modelling are consistent with the common county/provincial modelling techniques thus the approach is considered appropriate and accurate for the purpose of this assessment ". If their reports are supposedly consistent with the county and provincial modelling techniques, then it appears the county and province are negligent in their duties to protect the residents of Rocky View and Alberta. Until such time that these modelling techniques are corrected, no further gravel pit applications should be permitted and this pit's application should be rejected. Furthermore, the study should take into account the accumulative effects of the 4 proposed pit applications and the existing (Hillstone) pit and the total effect on ground water for the combined mining operation.

With respect to acoustical noise

Upon review of the peer review documents of the SLR submission for the recently rejected Scott pit in Bears Paw, the engineer (Mr. James Farguharson), who did the peer review clearly stated concerns with the data SLR submitted. He states "that the SLR's report is at best very misleading, and in reality, are extremely deficient, factually incorrect and cannot be relied upon to make an objective assessment of the acoustic impacts from the proposed pit." He further states "by not considering the potential impact to the homes further from the proposed site SLR's report is deficient, the predictive modelling is flawed and cannot be relied upon by RVC."

SLR has provided the same report for the proposed Summit Pit and used the same modelling technique. Our community has a direct line of site into the proposed Summit pit and therefore the SLR acoustical report for that proposed site is also deficient, the predictive modelling can be assumed to be flawed and it cannot be relied upon by RVC.

With respect to traffic

Report titled Review of the traffic impact assessment report, which was submitted in conjunction with the land use redesignation application and master site development plans for Lafarge McNair and summit pits, the conclusion reached was:

1. This study has concluded that the Traffic Impact Assessment studies reviewed are narrowly focused on intersection analysis, the outcome of which depends entirely on the, input values, namely the number of trips forecast. The reports reviewed did not consider the explicit value of safety, the wide range of road users, trip types, the operating

environment or all parameters of the road network in question such as the steep grades, narrow shoulders, unforgiving roadside and hidden intersections. A comprehensive TIA approach would consider the interaction of all these factors and avoid ascribing crashes to driver error. The TIAs did not comment on operation of school buses in the same time slots as gravel trucks which may contribute to conflicts and crashes. With respect to the highway system, which has steep downgrades on reverse curves and narrow shoulders, the TIAs did not comment on road safety which is exacerbated in icy and snowy conditions. No mention was made of potential safety issues at hidden intersections, where a fatality occurred involving a gravel truck during the course of this study. Finally, the TIAs did not include a discussion of the impact of loaded gravel trucks which will slow to crawl speed on long steep grades resulting in platoons. Impatient drivers delayed on the upgrade and trapped in platoons may make risky overtaking maneuvers. In summary, a more holistic TIA approach to evaluating the impact of an increasing fleet of heavy trucks hauling aggregate on the highways of the Rocky View County would have provided a sounder basis for evaluating the Applications for the redesignation of land-use.

Once again, the submitted plans provide are misleading and in reality, were deficient and cannot be relied upon to make an objective assessment of the traffic impact from the proposed pits.

With respect to storm water drainage

In a thesis written by Soren Poschmann, titled “establishing a recharge area for Big Hill Springs Alberta Canada”:

The thesis clearly establishes that the headwater of the Big Hill Springs and Creek are clearly in the exact location of the 4 Proposed open pit aggregate extraction. The affect of the accumulated actions of these developments is not yet understood. To risk the unique and nationally protected Big Hill Spring, one of Rocky View Counties most precious natural site is irresponsible. Over 250,000 visitors use the park annually. Of the three new pits along highway 56, the summit pit may raise the most serious environmental concerns, as it is the closest pit to Big Hill Springs Provincial Park and to the environmentally sensitive area being preserved by the nature conservancy of Canada.

In the summit pit submission even SLR published in their conclusion of the storm water drainage: “a particular emphasis has been placed on the surface water quality owing to the potential “sensitive“ nature of the local water environment”. If we can extrapolate from the misleading statements in other areas of their report we should be concerned when they use a phrase like “sensitive nature of the local water environment”. Until there is further study to better understand how the headwaters of Big Hill Springs work

this area should be protected and therefore this proposal should NOT be approved by RVC.

Just the potential traffic and environmental issues clearly show that a different approach is needed and the accumulative effects of all the proposed gravel pits in the area need to be assessed before any of these projects can be approved.

For these reasons I am apposed to this application

In Closing

In my 27 years as a Rocky View resident, I have seen many changes. For the most part RVC has, in my opinion, done a great job of reviewing the science on projects and listening to residents in planning these developments. I have faith that this proposal will be rejected until such time as the proper science has been provided and the methodology for approving gravel pits reviewed and repaired. So, until the accumulative affects for Gravel extraction in this area have been properly studied with full peer reviewed science (not just relying on reports paid for by the gravel pit owners and not independently reviewed), I stand opposed to this submission.

Respectfully submitted,
Ken Mattie

Michelle Mitton

From: Kevin Stewart [REDACTED]
Sent: February 17, 2021 2:04 PM
To: Legislative Services Shared
Cc: Edmonton.goldbar@assembly.ab.ca; info@bighillcreek.ca
Subject: [EXTERNAL] - Bylaw C-8051-2020 (Mountain Ash Application PL 20200031)

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

DON'T LET GRAVEL MINES RUIN BIG HILL SPRINGS

I'm nature photographer who highlights the biodiversity of the Saskatchewan River Basin.

I'm extremely concerned about the impacts of a gravel mine near the biologically & geologically important Big Hill Springs Provincial Park.

Springs are wonderful, but fragile. Efforts should work towards expanding the park to protect the springs, not destroy them.

Also, why would I spend my tourism dollars to see a place that will be destroyed?

Future visitor,

Kevin Stewart
7702-79 Ave. NW
Edmonton, AB
T6C 0P6

Sent from my iPad

Michelle Mitton

From: Laurie Larin [REDACTED]
Sent: Saturday, February 6, 2021 2:11 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C8051-2020

Follow Up Flag: Follow up
Flag Status: Completed

Do not open links or attachments unless sender and content are known.

I am opposed to the Mountain Ash proposal and to the open pit gravel mining in the area of Big Hill Springs. Please don't ruin our beautiful park that is used by hundreds of people weekly. I don't want my nature walk to be to the sounds of industrial equipment and rock crushers and instead of breathing in fresh air, breathing silica dust, a known carcinogen.

Laurie Larin
Cochrane Alberta

Michelle Mitton

From: Leah [REDACTED]
Sent: February 16, 2021 8:52 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - FW: Bylaw C-8051-2020 - OPPOSED
Attachments: Bylaw C-8051-2020-OPPOSED.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

In response to the Notice of Public Hearing regarding application number PL202000031 (06731002/4), our household is **OPPOSED**.

Please find attached a letter outlining the reasons for our opposition to the above noted Bylaw for inclusion in the agenda package for the Public Hearing.

Thank you for your time and consideration,

Leah and Mark Pearce
31 Big Hill Creek Estates
Rocky View County

Sent from [Mail](#) for Windows 10 on my Desktop

Leah and Mark Pearce
31 Big Hill Creek Estates
Rocky View County, AB T4C 2X6



February 12, 2021

Planning Services
Rocky View County
262075 Rocky View Point
Rocky View County, AB T4A 0X2

Re: Bylaw C-8051-2020

Encl: Mountain Ash site map

Dear Honorable Chairperson and Council Members;

In response to the Notice of Public Hearing regarding application number PL202000031 (06731002/4), the Pearce family is **OPPOSED**.

What is happening in this relatively tiny area of our community when it comes to gravel pit applications is nothing short of insanity.

“Insanity is doing the same thing, over and over again, but expecting different results.” ~Albert Einstein

The area along Highway 567, as far west as Highway 22 and as far east as Hwy 766 is under immense pressure for gravel pit development primarily due to its geological characteristics and secondarily because of its proximity to an important transportation corridor (see attached map). Although, our concerns are the same as those expressed by citizens that have spoken in opposition to gravel pit development in the last seven years, each one of our concerns are multiplied by each and every additional gravel pit application that remains to be reviewed in the proximity of Highway 567.

Our concerns with this specific application, all of which will be discussed in greater detail as a video submission, include the following:

- 1) The effects of gravel extraction on groundwater, compounded by the proximity of current and future gravel pit development.
- 2) The health effects of dust, compounding due to the proximity of an existing gravel pit.
- 3) The impact of noise from two adjacent gravel pits, compounding due to proximity.
- 4) Traffic safety issues on Highway 567 due to proximity of current and future gravel pit development.
- 5) No consideration for decreased property values due to shortsighted development of the area.
- 6) Ongoing and opposing views regarding “buffer zones”
- 7) The silent death of the Aggregate Extraction Plan.
- 8) The absence of an Area Structure Plan for an area that should require one.

We are not against development; we are not against gravel pits. Two gravel pits already exist near our property, one to the north on the 567 and another to the east on Glendale Rd. Aside from the issues specific to the development of this pit, our concerns are multiplied with each additional gravel pit that is approved in the same proximity. Rocky View does not have any plan to address the concerns that a case-by-case review of each gravel pit application is lacking which is the BIGGER picture as it pertains to future impacts. With every application, everyone goes through the motions, the same motions without any real understanding of a long-term plan for responsible development of open pit mining of aggregate that considers the views of all Stakeholders.

The process for the consideration for gravel pit development is myopic, at best, and much more needs to be done to ensure that all future development within this specific area of Rocky View county is balanced and measured.

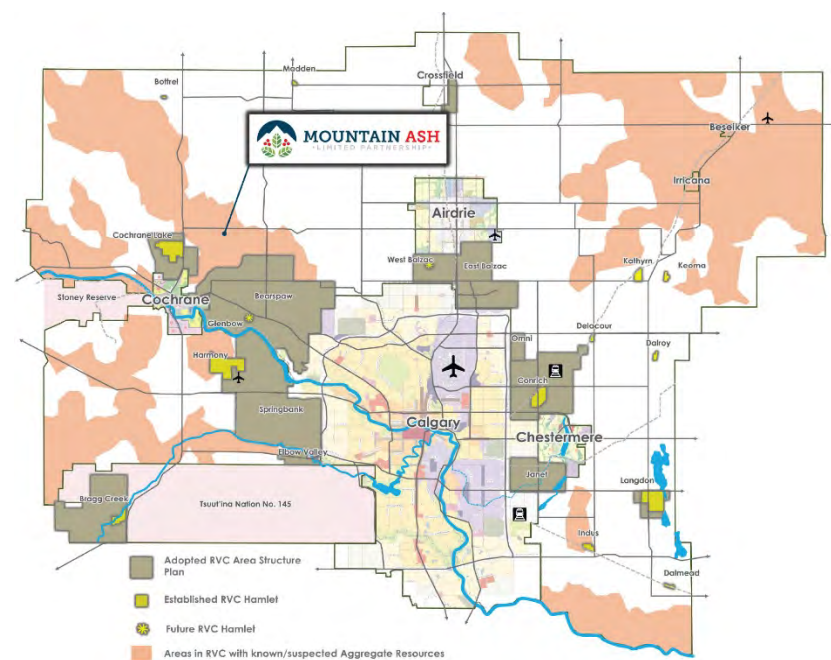
Thank you for your time and consideration.

Sincerely,

Leah and Mark Pearce

Residents, Property Owners and Taxpayers

Map illustrating area under immense pressure due to aggregate resources along Highway 22 and Highway 567.



Michelle Mitton

From: Kenneth's iPad [REDACTED]
Sent: Sunday, February 14, 2021 11:18 AM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C-8051-2020 (Mountain Ash Application PL 20200031)

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

To Whom it May Concern:

This email is intended to request that the County of Rocky View research the effects of approving an open pit gravel mine so close to the Big Hill Springs Provincial Park. It is felt that the open pit mine could result in contamination of the Springs and all they support in this area. Perhaps a more suitable location for the mine could be made available. Please ensure the County is being environmentally conscientious in its discussions regarding designating this site for mining.

The last time my husband and I visited the park was just prior to it being closed for supposed renovations. It was an opportunity, during COVID, to access a beautiful location where many couples and families could enjoy the trails, the creek and the outdoor scenery. Although the parking lot was full that day, we were able to have a distanced visit with another couple and enjoy our lunches while not being anywhere near other visitors to the area. The Park's proximity to rural communities and cities makes it another wonderful place to gather and to enjoy the natural beauty of our Province. Please ensure that isn't put in jeopardy for current and future generations.

Linda Fulton
Concerned Alberta Citizen

Sent from my iPad

Michelle Mitton

From: Linda Hodgins [REDACTED]
Sent: Monday, February 8, 2021 12:28 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C8051-2020

Follow Up Flag: Follow up
Flag Status: Completed

Do not open links or attachments unless sender and content are known.

Mountain Ash Application
PI 20200031

Please do not allow a gravel pit to be established and please cancel all applications As someone living in Cochrane and enjoying the natural beauty of the Big Hill Springs Park I feel there is no place for a gravel pit within 100 miles of the pristine park.

Please preserve the natural spaces for future generations Linda Hodgins

Sent from my iPhone

Michelle Mitton

From: Lori [REDACTED]
Sent: February 17, 2021 11:44 AM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C-8051-2020 (Mountain Ash Application PL 20200031)

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

Hello, as a Cochrane resident for close to 20 years I am strongly opposed to any open pit gravel mining in this area. I believe it will harm the area where Big Hill Springs Provincial Park is located. My family has frequented this park for years and would not want it damaged due to gravel pit mining activity in the area.

Lori Bergeron
[REDACTED]

Michelle Mitton

From: Lori Skulski [REDACTED]
Sent: February 17, 2021 3:20 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C-8051-2020 (Mountain Ash Application PL 20200031)

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

Hi,
I'm writing to express my deep concern about the planned gravel pit excavation that will affect the aquifer that charges the main feature and associated wetlands on surface at Big Hill Springs Provincial Park.

I have experience in hydrogeology. Following an extensive career as an oil and gas geologist, I was also manager of our hydrogeology group which provided vital understanding of the interconnected groundwater and hydrocarbon system in that area.

From this background, I am fully aware that exposure of this aquifer at surface and subsequent gravel extraction from it will result in detrimental lowering of the water table, as well as exposing the unique and rare environment of Big Hill Springs, dependent for its tufa-depositing spring flow on the interconnected aquifer system, to inevitable contamination of the water resource from surface activities. Removal of the overburden and any vegetation cover will make this a certainty.

This is not a small project. This and associated planned gravel lease activities will result in a exploitation basin of approximately 2 square miles. It is large and tremendously damaging and will reduce the flow in associated Bighill Creek by half, with detrimental effects to the entire area fed by this creek system.

The impacts make this a proposal that is far beyond the abilities of Rocky View County Council to rule on in isolation and you should not be doing so. You need to require the operator to undertake an environmental impact and cumulative effects assessment done by qualified consultants.

You must not allow this damaging project to go ahead without this.

Thank you for the opportunity to comment.

Lori Skulski
Calgary

Sent from my iPad

Michelle Mitton

From: Lyse Carignan [REDACTED]
Sent: Monday, February 15, 2021 3:09 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C-8051-2020/Mountain Ash Application PL20200031
Attachments: gravelpits-mysubmissiontorvc-Feb.15-21.docx

Follow Up Flag: Follow up
Flag Status: Flagged

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Bylaw C-8051-2020/Mountain Ash Application PL20200031
February 15, 2021

Legislative services@rockyview.ca

Bylaw C-8051-2020

Mountain Ash Application PL20200031

I am writing to you regarding the open gravel pit mines planned for the area immediately northwest of Bighill Springs Provincial Park. If these and other lands in the immediate vicinity owned by gravel companies are allowed to be developed, they would create a basin over two square miles in size.

As a landowner, I am concerned about our well water which could be affected by all developments regarding increased recharge and constituent mobilization into the groundwater sustaining Bighill Springs. Our well water comes directly from that basin which would be created by these four gravel operators.

The open pit mines would be located in the sensitive headwaters of the aquifer which feeds the springs of Bighill Springs Provincial Park and consequently the Big Hill Creek.

Gravel mines would remove the protective layers which guard the aquifer from contamination. Planned gravel excavation would remove protective layers, leaving only one meter of gravel to filter out contaminants like spilled fuel, herbicides, contaminants released by the mining process. Since the water level in the aquifer fluctuates over time, raising concerns about the adequacy of the narrow remaining filter and the potential need for pumping water from the pit directly into the Creek.

I am also concerned about the recharge of the springs and possible direct effects on the fish and aquatic species supporting them, during these mining operations. The flow would fluctuate, therefore the water temperature could rise considerably. Brook Trout could be directly affected since they thrive in the colder water of the creek closer to the springs.

In the situation where a very vulnerable and rare aquifer is concerned, where endangered species are at stake in the waters, and where clean, reliable drinking water could be impacted, there is every reason for Rocky View County to consider the cumulative impacts that multiple pits would have on the water balance and water quality in this sand and gravel aquifer and the resulting impacts to connected aquatic features, and reject them.

We have had constant delivery of good quality water of stable temperature up to now and it needs to continue.

Lyse Carignan

Land description: NW12-26-04-05

February 15, 2021

Legislative services@rockyview.ca

Bylaw C-8051-2020

Mountain Ash Application PL20200031

I am writing to you regarding the open gravel pit mines planned for the area immediately northwest of Bighill Springs Provincial Park. If these and other lands in the immediate vicinity owned by gravel companies are allowed to be developed, they would create a basin over two square miles in size.

As a landowner, I am concerned about our well water which could be affected by all developments regarding increased recharge and constituent mobilization into the ground water sustaining Bighill Springs. Our well water comes directly from that basin which would be created by these four gravel operators.

The open pit mines would be located in the sensitive headwaters of the aquifer which feeds the springs of Bighill Springs Provincial Park and consequently the Big Hill Creek.

Gravel mines would remove the protective layers which guard the aquifer from contamination. Planned gravel excavation would remove protective layers, leaving only one meter of gravel to filter out contaminants like spilled fuel, herbicides, contaminants released by the mining process. Since the water level in the aquifer fluctuates over time, raising concerns about the adequacy of the narrow remaining filter and the potential need for pumping water from the pit directly into the Creek.

I am also concerned about the recharge of the springs and possible direct effects on the fish and aquatic species supporting them, during these mining operations. The flow would fluctuate, therefore the water temperature could raise considerably. Brook Trout could be directly affected since they thrive in the colder water of the creek closer to the springs.

In the situation where a very vulnerable and rare aquifer is concerned, where endangered species are at stake in the waters, and where clean, reliable drinking water could be impacted, there is every reason for Rocky View County to consider the cumulative impacts that multiple pits would have on the water balance and water quality in this sand and gravel aquifer and the resulting impacts to connected aquatic features, and reject them.

We have had constant delivery of good quality water of stable temperature up to now and it needs to continue.

Lyse Carignan

Land description: NW12-26-04-05

Michelle Mitton

From: Edmonton-Gold Bar <Edmonton.Goldbar@assembly.ab.ca>
Sent: February 17, 2021 4:06 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Re: Bylaw C-8051-2020
Attachments: Letter to Rocky View Coucil.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

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Please see the attached correspondence from MLA Schmidt.

Katy Campbell

Constituency Assistant
Marlin Schmidt, MLA Edmonton-Gold Bar
ph: 780-414-1015
fx: 780-414-1017



Marlin Schmidt, MLA
Edmonton-Gold Bar

Feb 17, 2021

To the Rocky View County Council:

RE: Bylaw C-8051-2020 (Mountain Ash Application PL 20200031)

In my capacity as Environment and Parks critic for the official opposition in Alberta, I have heard recently from many residents of Rocky View County with concerns related to the development application before you and the potential impacts of the referenced proposed gravel development adjacent to Big Hill Springs Provincial Park.

It is my understanding that the proposed gravel mine would be located within the channel that provides the source water for the springs in the park. This type of development will remove vegetation, top soil and up to twenty meters of the protective over burden. This could leave the aquifer vulnerable to potential degradation of the water quality entering the park, impacting the whole park ecosystem.

I recognize that it is not the role of the county to regulate the environmental impact of proposed developments such as this gravel pit. However, it is my opinion that the current provincial system for regulating the development of these pits is insufficient for protecting Big Hill Springs Provincial Park against the potential impacts the pits may cause. This is why I'm asking the County Council to consider this in weighing the decision – the Province will not be able to fulfill its usual role in this case.

Big Hill Springs Provincial Park is an area of value to all Albertans. I urge you to carefully consider the potential impacts on the park when evaluating whether this application should go forward.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Marlin Schmidt'.

Marlin Schmidt, MLA
Edmonton-Gold Bar

Michelle Mitton

From: Meg Kenny [REDACTED]
Sent: Saturday, February 6, 2021 10:18 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C8051-2020

Follow Up Flag: Follow up
Flag Status: Completed

Do not open links or attachments unless sender and content are known.

I oppose the gravel pit plans for Big Hill Springs and demand this does NOT go forward.

You have no right to this area and you need to say NO!

Have a conscience!

Meg Kenny

Michelle Mitton

From: Michael Foster [REDACTED] on behalf of Michael Foster [REDACTED]
Sent: Monday, February 15, 2021 12:21 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Mountain Ash application;PL 20200031; bylaw C-8051-2020

Follow Up Flag: Follow up
Flag Status: Flagged

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As a resident of Rockyview County living in the Bighill Creek valley adjacent to the Bighill creek about 2 km from Cochrane (NW 12-26-04-05), I am writing to convey my concerns with the proposed gravel pit application planned near the headwaters of the Bighill Creek springs. This would be directly adjacent to the Bighill Springs Provincial Park and could potentially directly affect the springs and the creek itself. As there already appear to be substantial gravel pits in the general area, in order to protect the springs, the park, and the quality of the creek flow which in turn affect the natural habitat here, I am urging council to reject this application permanently.

Thank you,

Sincerely,

Michael J. Foster, MD

Michelle Mitton

From: Michael Stangeland [REDACTED]
Sent: Friday, February 5, 2021 4:24 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - OPPOSITION to the Big Hill Springs Mountain Ash proposal

Follow Up Flag: Follow up
Flag Status: Completed

Do not open links or attachments unless sender and content are known.

I would like to voice my OPPOSITION to the Mountain Ash proposal for the open pit gravel mining near Big Hill Springs provincial park.

If this email is not sufficient, please let me know what I need to do.

Best regards,
Michael

Michelle Mitton

From: Norene Procter [REDACTED]
Sent: Tuesday, January 26, 2021 10:54 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - BYLAW C8051-2020**

Importance: High

Follow Up Flag: Follow up
Flag Status: Completed

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Legislative Services Rockyview

Hi, January 26, 2021

RE: Gravel Pit Proposal from Mountain Ash Limited Parnership -Big Hill Springs & Creek & Big Hill Springs Provincial Park

I am writing you regarding the proposal for a gravel pit from Mountain Ash Limited Partnership which may cause terrible environmental destruction to Big Hill Springs and Creek and Big Hill Springs Provincial Park.

Our parks in Alberta are precious and need to be maintained in that light. People need these parks to enjoy. This is about protecting our parks for your children and grandchildren.

Open pit mining does not work well with parks where people go to enjoy nature. Lets keep Alberta beautiful and safe for future generations.

As silica dust is a carcinogen, I am strongly opposed to this project going ahead.

Thank you.
Norene Procter

Michelle Mitton

From: [REDACTED]
Sent: February 17, 2021 4:02 PM
To: Legislative Services Shared
Cc: Pamwight
Subject: [EXTERNAL] - Bylaw C-8051-2020 (Mountain Ash Application PL 20200031)
Attachments: Mtn Ash App PL 20200031 P Wight let.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

Please accept the attached letter of objection to the application.

Thank you

Pamela Wight
[REDACTED]



February 17, 2021

Reeve and Council, Rocky View County
262075 Rocky View Point
Rocky View County, AB, T4A 0X2

Legislativeservices@rockyview.ca

Re Bylaw C-8051-2020 (Mountain Ash Application PL 20200031)

Dear Reeve and Council:

I am writing in opposition to the development of an industrial gravel mine, planned for the area immediately northwest of Big Hill Springs Provincial Park (BHSPP), by Mountain Ash Limited Partnership, Summit mine.

Not only does this activity threaten our water and wildlife, but it would create a massive basin right within the area's headwaters.

Incredibly, the proposed mine is to be located in the sensitive headwaters of the ancient aquifer that feeds the springs in BHSPP, and these sensitive headwaters also flow into Bighill Creek! This alone would call for rejection of the application, since gravel mining destroys aquifers.

Were gravel mining to be allowed, the recharge of the springs would be forced through a dramatically reduced protective filter, and groundwater contaminants would contaminate the springs and eventually Bighill Creek. This in turn would impact the fish and aquatic species there.

In fact, there have been repeated calls for better protection of the springs, as well as a decade of public calls to expand the BHSPP to the north and further, in the County's own Parks and Open Space Master Plan. Indeed, this is unsurprising, since the Park is considered both to be overcrowded, and also has attributes of national significance. These include the springs, which rank among the "*top four mineral springs in Canada*" – the very springs that would be negatively impacted by the gravel mine.

As a related factor, the federal Department of Fisheries and Oceans (DFO) has ranked the springs and park area as critical habitat for the Bull Trout under the Species at Risk Act (SARA - Threatened). And besides this, the area provides habitat for diverse other Species at Risk including mammals and birds.

While not being opposed to all gravel mines, I am aware that communities, families, and working farms rely entirely on groundwater connected through the reach of the headwaters, aquifers and tributaries. In addition, the health of all our drinking water depends on healthy aquatic ecosystems such as in Bighill Creek. But with this proposal, we are at risk without science based protection and cumulative effects assessments being placed on such gravel mining projects as Summit mine.

Significant gravel deposits exist in many other locations in the region which could supply gravel without imposing significant risks to the ongoing viability of Big Hill Springs aquifer, the Park and the Creek.

Rocky View County has an obligation to maintain and protect the water quantity and quality flowing downstream. By rejecting this development application, Rocky View County would demonstrate responsible stewardship of its resources with appropriate regard to Species at Risk and communities downstream. I trust you will demonstrate leadership in this regard.

Sincerely

A handwritten signature in blue ink that reads 'Pamela Wight'.

Pamela Wight

Michelle Mitton

From: Raymundo Wah [REDACTED]
Sent: February 17, 2021 12:11 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C-8051-2020. Summit Pit Application from Mountain Ash Ltd.

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

To whom it may concern.

With all due respect, please:

No Summit Pit gravel extraction application.
No more gravel pits in our backyard.
No more dust.
No more trucks on our roads.
No more noise from blasting, crushing or heavy trucks.
No decrease to property values by living in close proximity to a pit.
No more road accidents.

Thank you very much.

Raymond Wah
24 Woodland Ridge NW

Sent from [Outlook](#)

Michelle Mitton

From: Bob Betty [REDACTED]
Sent: February 17, 2021 1:26 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C-8051-2020 (Mountain Ash Application PL 20200031)

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

I have reviewed material sent to me by the Bighill Creek Preservation Society concerning the potential threat to Big Hill Springs Provincial Park by a proposed gravel pit development in the aquifer that feeds the springs. Any such development must not damage a special and unique geological feature in a Provincial Park that we are privileged to have so close and available to urban populations.

I trust that your considerations will not result in risk of damage to this unique local area.

Thank you

Robert Betty
[REDACTED]



Virus-free. www.avg.com

Michelle Mitton

From: Robert Hamilton [REDACTED]
Sent: Friday, February 5, 2021 4:40 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C8051-2020

Follow Up Flag: Follow up
Flag Status: Completed

Do not open links or attachments unless sender and content are known.

I am writing to express my concern with regards to the Mountain Ash proposal for an open pit gravel mine near Big Hill Springs Provincial Park. As a resident of Cochrane Alberta, I have greatly enjoyed a quick drive for a quiet peaceful walk in this park on many occasions. I simply can not believe anyone would even entertain the idea of placing a gravel pit on the doorsteps of this natural treasure.

Please vote against this proposal.

Thank you for your consideration.

Sincerely,

Robert Hamilton
175 Jumping Pound Terrace
Cochrane, AB
T4C 0K5

Michelle Mitton

From: Rocky View Forward <info@rockyviewforward.com>
Sent: February 17, 2021 4:00 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - March 2, 2021 public hearing for Bylaw C-8051-2020
Attachments: rvf-summitpit-march2hearing-final.pdf

Follow Up Flag: Follow up
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Greetings:

Please find attached the submission in opposition to Mountain Ash's redesignation application and MSDP from Rocky View Forward.

Thanks,
Rocky View Forward

**March 2, 2021 Public Hearing for Bylaw C – 8051 – 2020
Redesignation Application for NW/SW-31-26-03-W05M
and Mountain Ash Limited Partnership’s associated Master Site
Development Plan**

**Submitted in Opposition by:
Rocky View Forward, February 17, 2021**

Rocky View Forward is a resident advocacy group representing almost 500 families across the County. We are making this submission in opposition to Mountain Ash Limited Partnership’s application to redesignate a quarter section of land south of Highway 567, east of Range Road 40 and to its application for approval of the accompanying Master Site Development Plan.

There are innumerable technical reasons for opposing this application. The concerns raised by those issues will be dealt with by many other submissions at this public hearing. Rocky View Forward concurs with the technical concerns that should result in the rejection of this application. However, rather than repeating these shortcomings, Rocky View Forward will focus on the following significant concerns:

- The history of Mountain Ash / Summit Pit applications;
- Legal constraints regarding the application; and
- The negative impact on Rocky View’s tourism.

Mountain Ash / Summit Pit Application History

This is the third application dealing with what is referred to as the Summit Pit. In its first application, the pit operators applied to have 40 acres redesignated from Ranch & Farm to operate a gravel pit in the quarter section immediately north of the quarter section that is the subject of this application. At that time, they pitched their application as signalling their intent to be a good neighbour. They argued that they were only applying to redesignate 40 acres so that the community would have repeated opportunities to assess and comment on the quality of their operations as they extracted gravel from the quarter section immediately south of Highway 567. They expressed confidence that the community would see that they were responsible operators and be supportive of their subsequent applications.

Having succeeded in obtaining that initial redesignation, they returned less than a year later, before they had started operations, requesting that the remainder of that quarter section should be redesignated. Their argument at that point was that, in only having 40 acres redesignated in the original public hearing, they were now at a competitive disadvantage relative to the two other gravel operators who had successfully redesignated their entire properties at the same time. It is not clear where there “good neighbour” assurances had

gone; but council accommodated their request and approved the redesignation of the remainder of that quarter section.

Now Mountain Ash Limited Partnership is returning asking for the adjacent quarter section to also be redesignated from agricultural to aggregate extraction. It is not clear how this application fits either with their “good neighbour” assertions or with their concerns about their competitive disadvantage. As a bare minimum, the continued expansion of their applications leads one to question the trustworthiness of their assurances – earlier declarations appear to be forgotten whenever convenient. The County should, therefore, treat Mountain Ash’s current application with an extra degree of skepticism.

Legal Issues Associated with this Application

The more northerly of Mountain Ash’s two quarter sections south of Highway 567 is part of the County’s appeal against the successful judicial review that set aside Rocky View’s 2017 approvals of three gravel pits along Highway 567. The appeal court’s decision has not yet been released. Until the appeal is decided, the more northerly quarter section maintains its original Ranch & Farm land use designation.

While Rocky View Forward recognizes that this redesignation application is for a separate parcel of land, it is disingenuous to pretend that the appropriateness of its redesignation is not affected by or related to the land use designation of the other quarter section. Council faces a complicated choice if it proceeds with this application before the Court of Appeal of Alberta releases its decision.

If Council assumes the County will win its appeal, then this application needs to deal with the substantive cumulative impacts that will result from three additional gravel pits suddenly getting the green light to proceed at this location. However, the application does not provide Council with any guidance on how to deal with that eventuality. Mountain Ash’s application completely ignores cumulative impacts and “promises” to deal with such concerns if they become relevant.

On the other hand, if Council assumes that the lower court decision favouring the County’s own residents is upheld, then Council needs to determine whether it is appropriate to redesignate this isolated quarter section that poses substantial environmental risks to the nearby Big Hill Springs Provincial Park. Council then also needs to consider the implications of this application for the other gravel pit applications that would have to be reheard.

Neither choice is a good one and suggests that the most prudent route for Council may be to defer a decision on this application until the Court of Appeal has released its decision.

At the very least, Council must not approve the Master Site Development Plan submitted alongside this redesignation application. The MSDP lays out Mountain Ash's operating plans for the two quarter sections even though half of that property does not currently have the appropriate land use designation to operate as a gravel pit. A MSDP cannot be approved for a property that does not have the land use designation needed to conduct the operations outline in the MSDP. To do otherwise would be signalling serious contempt for the legal process that the County itself has prolonged.

Negative Impact on Rocky View Tourism

Rocky View has made a commitment to encourage and enhance tourism opportunities in the County. A major part of Rocky View's attractiveness as a tourist destination is its natural environment that provides wonderful opportunities to experience the transition from the expansive prairie to the towering Rocky Mountains. The three provincial parks within the County - Big Hill Creek, Bragg Creek and Glenbow - are all excellent resources that the County should be promoting as unique and cherished features.

Big Hill Springs Provincial Park is one of the most heavily used provincial parks in Alberta. It was closed for the 2020 parks season to undergo upgrades to address that heavy usage - nearly 250,000 visitors in the 2019 season. It is scheduled to reopen this spring and is anticipating even more visitors given the dramatic increase all Alberta parks have experienced.

The Park's attractiveness focusses on the Big Hill Springs and Creek and the unique tufa rock formations that these have created over its geological history. Those are all at risk from this gravel application.

Even if one could ignore the serious risks to the springs and creek, having a gravel pit operating less than 800 metres from the Park would drastically erode its attractiveness as a tourist destination. Who wants to go out to enjoy nature next to gravel crushers and the noise and dust they unavoidably generate? Not to mention the increased traffic dangers from more gravel trucks on the hilly curves of Highway 567.

As has been pointed out repeatedly, Rocky View has extremely generous aggregate deposits. Many of these are in locations that do not put the County's residents, environment, or visiting tourists at risk. It is Council's responsibility to ensure that its gravel resources are exploited in a responsible manner. A decision on the land use suitability of any parcel of land needs to take into consideration many factors. In this case, it should be clear that the balance of those considerations does not support Mountain Ash's desire to operate a gravel pit here. As a result, the application should be refused.

Michelle Mitton

From: Rocky View Gravel Watch <rockyviewgravelwatch@gmail.com>
Sent: February 17, 2021 2:02 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C-8051-2020: Mountain Ash / Summit Pit Public Hearing: March 2nd
Attachments: rvgw-summitpit-publichearing-submission-final.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

Greetings:

Please find attached Rocky View Gravel Watch's submission in opposition to Mountain Ash's redesignation application which is scheduled to be heard at the March 2, 2021 public hearing.

Thanks,
Rocky View Gravel Watch

Bylaw C-8051-2020: Mountain Ash Limited Partnership Redesignation Application for Summit Gravel Pit

Submission prepared by: Rocky View Gravel Watch February 17, 2021

Rocky View Gravel Watch represents almost 200 families across the County on issues related to aggregate operations. The organization and the residents it represents are opposed to Mountain Ash Limited Partnership's application to redesignate 160 acres at the south-east corner of Highway 567 and Range Road 40 and the accompanying Master Site Development Plan.

Our submission in opposition to this application focuses on four main issues:

- Environmental risks;
- Wildlife impacts;
- Lack of cumulative impact assessment; and
- Traffic safety concerns.

Environmental Risks

As is discussed in more detail elsewhere (see Dr. Jon Fennel's submission in particular), the proposed location for the Summit Pit poses serious risks to the aquifer that provides water to Big Hill Springs and Big Hill Creek.

For a parcel of land to be suitable for use as an aggregate extraction operation, that use must not involve significant environmental risks. There are many locations in Rocky View with generous aggregate deposits that do not pose comparable risks to the environment.

In the case of Summit's location, Mountain Ash Limited Partnership proposes to extract 20 – 30 metres of gravel from above the aquifer that supplies the headwaters for Big Hill Springs and Big Hill Springs Creek, down to 1 metre above the water table. As is ably demonstrated in the technical report submitted by Dr. Jon Fennel and supported by submissions by other qualified experts, this creates material risks to the Big Hill Springs and Creek which, in turn, pose significant risks to downstream water quality.

Relying on the applicant's assertions that the risks do not exist or are not material is not appropriate – they have a strong vested interest in presenting information in a manner that is to their own advantage.

It is the responsibility of Rocky View Administration and Council to determine for themselves whether the land is environmentally sensitive and therefore not suitable for aggregate extraction. The County's own mapping prepared for the new Municipal Development Plan identifies the land in the area of this proposed gravel pit as ecologically sensitive. This, combined with information provided by independent

technical experts, clearly indicates that environmental risks at this location should preclude its use for aggregate extraction.

The environmental sensitivities of the area extend to the County's responsibility to comply with federal fisheries and species at risk legislation. Big Hill Creek is one of the few trout spawning grounds between the Rockies and Calgary. As such, it should be protected. It is also an aquatic environment that supports the endangered Bull Trout. This magnifies the County's environmental responsibilities to legal requirements under the Fisheries Act to "do no harm" to fish habitat. The technical material submitted by Mountain Ash in support of its application does not even discuss, let alone evaluate, the potential risks to the aquatic habitat. This critical omission should, on its own, be sufficient grounds to refuse the application as incomplete.

The statements in Mountain Ash's MSDP regarding the environmental and biophysical characteristics of its property contradict themselves. Their MSDP asserts that "the site does not contain any watercourses or obvious drainages that may have hydraulic connections with adjacent lands". However, on the immediately preceding page, the MSDP acknowledged that the land has "slopes falling into a natural valley system that extends to the southeast towards the Big Hill Creek". If slopes extending toward Big Hill Creek are not "drainages that may have hydraulic connections with adjacent lands", it is not clear what would satisfy that criteria. Mountain Ash's own words indicate that they are aware of, and have chosen to ignore, the risks their proposed operation will pose for Big Hill Creek.

Wildlife Corridors

The entire area around Big Hill Springs Provincial Park is a well-travelled wildlife corridor with many species attracted to the water availability from the springs and creek. The wildlife that lives and frequents the area include many threatened species that are iconic to Alberta – grizzly bears, peregrine falcons, golden eagles, prairie falcons – not to mention the moose, cougars, and many others that rely on the water source and coulees of this environmentally sensitive area.

To casually dismiss the relevance of wildlife corridors and the unmitigable damage aggregate extraction imposes on these essential corridors is foolhardy. It is also completely inconsistent with Rocky View's assertions that it values and protects the County's natural environment.

Lack of cumulative impact assessment

Mountain Ash's application assumes that it is unnecessary to address cumulative effects at this point and only makes commitments to participate in whatever the County may require on that issue in the future if the County approves additional gravel pit applications along Highway 567.

It is unclear how the County could impose after-the-fact requirements on Summit Pit's operations, or the operations of other existing pits, if it does approve additional gravel pit

operations in the immediate area. As a result, it is easy for Mountain Ash to “promise” something that they may never have to deliver.

Their approach also completely ignores the reality that there is already a gravel pit operating less than a mile away along the same highway and another pit operating slightly further away to the south-east of its proposed location. The presence of Hillstone Aggregates on Highway 567 mean that the additional truck traffic from the proposed Summit Pit will have a cumulative impact on traffic safety on the highway (see below for a detailed discussion of this issue). The presence of the Lafarge Glendale pit to the south-east means there will be cumulative impacts from two pits operating in close proximity to Big Hill Springs Provincial Park. None of these immediate cumulative impacts from the proposed Summit Pit have been addressed or even acknowledged in Mountain Ash’s application.

The preparation of an “assessment of cumulative aspects of extraction activities in the area” is a requirement under the County Plan. Mountain Ash has failed to comply with this requirement and, as a result, its application should be refused.

Traffic safety issues

The Mountain Ash MSDP asserts that “Highway 567 is a provincial high load corridor and ideally suited to accommodate aggregate resource hauling activities”. Mountain Ash provides no evidence to support their assertion. The validity of their assertion is thoroughly contradicted by the traffic evaluation study prepared for local residents by Mr. John Morell, P.Eng. and president of the Canadian Highways Institute. (This study has been submitted under separate cover by Mr. Harry Hodgson and should be referred to in support of the observations made here.)

Again, as with Mountain Ash’s technical hydrology and biophysical impact studies, the County has a responsibility to independently evaluate the traffic impact information provided by the applicant.

Mountain Ash’s traffic impact assessment focuses almost exclusively on the intersection its gravel trucks will use to access Summit Pit on the south side of Highway 567. It is proposing to upgrade the existing T-junction between southbound Range Road 40 and Highway 567. However, none of their information explains how the proposed upgrade will deal with the substantial correction line at Range Road 40 and Highway 567, with southbound Range Road 40 offset to the east from northbound Range Road 40.

Improving access to southbound Range Road 40 does not appear to do anything to address safety issues for traffic accessing northbound Range Road 40. As a result, gravel trucks entering and exiting the proposed Summit Pit location will negatively affect traffic safety at that intersection, which already has visibility issues because of the hill to the east of its T-junction at Highway 567 (something that Mountain Ash’s traffic impact assessment fails to acknowledge).

Mountain Ash provides no evidence to support its assertion that Highway 567 is “ideally suited to accommodate aggregate resource hauling activities”. The evidence in Mr. John Morell’s traffic study points out that “there have been numerous accidents and a death involving gravel trucks along this section of highway”. His study also emphasizes that Mountain Ash’s traffic assessment fails to examine road safety issues over the length of its proposed truck haul routes or the characteristics of Highway 567 which include concealed intersections, steep grades, narrow to non-existent shoulders, unforgiving roadsides, and inadequate site lines at many intersections, to mention just a few of the concerns raised in his report. Mr. Morell’s evaluation of all these issues concludes that “adding more trucks is unsafe”.

Mr. Morell’s report also pointed out that the aggregate companies’ traffic impact assessments failed to address the impact on road safety from loaded gravel trucks which will slow to crawl speed on Highway 567’s long steep grades. As Mr. Morell emphasized, the backlog of vehicles logjammed behind gravel trucks has a significant negative impact on traffic safety – impatient drivers trapped behind the gravel trucks are prone to making risky passing decisions, which are made more dangerous by the limited site lines along Highway 567.

An acceptable traffic impact assessment to support the appropriateness of a proposed gravel pit must evaluate the impact its operations will have on the overall road network its gravel trucks will drive on, not just the intersection at the gravel pit. Mountain Ash’s application fails to provide any such evaluation. As a result, its application should be refused as incomplete.

Conclusions

Rocky View Gravel Watch believes that the issues discussed in this submission are more than sufficient to conclude that this application should be refused. There are many other issues discussed in other submissions that also point to the appropriateness of refusing this application. We sincerely hope that Council considers all the information presented to it for this public hearing and does the right thing – turn down this application.

Michelle Mitton

From: Ryan Carnegie [REDACTED]
Sent: February 17, 2021 3:26 PM
To: Legislative Services Shared
Cc: [REDACTED]
Subject: [EXTERNAL] - Re: Bylaw C-8051-2020 - OPPOSED
Attachments: Carnegie (7 Big Hill Creek Estates) Opposition Letter.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

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Please find attached a letter in response to our opposition to Bylaw C-8051-2020 for consideration in the agenda for the public hearing.

Thank you for your consideration of our opposition.

Sincerely,
Ryan and Lynette Carnegie
7 Big Hill Creek Estates
Rockyview County, AB
T4C 2X6

To: legislativeservices@rockyview.ca

Subject: BYLAW C-8051-2020 File: PL20200031 (06731002/4)

We, Ryan & Lynette Carnegie, of 7 Big Hill Creek Estates, Rockyview County, are submitting this letter to voice our strong opposition to the consideration of Bylaw C-8051-2020 to redesignate NW/SW-31-26-03-W05M from Agricultural, General District to Direct Control District (DC), in order to facilitate an aggregate operation.

We bought our property 6 years ago because of the peaceful, rural lifestyle in which we wanted to raise our family and eventually retire. A gravel and sand pit in close proximity to our community would be devastating and ruin the quality of life that we and our neighbours enjoy so much. I ask that you hear our concerns and take into careful consideration the enormous negative impact such an operation would have on the community and the environment in which we live.

Personally, having a large-scale gravel extraction operation would directly affect our community as we are directly south by less than two kilometres, with a direct line of sight to the pit. Big Hill Creek Estates sits on the highest elevation in the greater region. Because of this, as many as seven dwellings within our community (as well as a number of other individual acreages) will have a direct view of the proposed operation. We already have noise pollution, dust pollution, and visual line of sight to the already existing Big Hill Aggregates pit located just west of the proposed pit. Adding another surface mining operation will only increase these issues. It is not difficult to foresee direct and significant impacts to our air quality, serenity and most important, property values. These are all reasons why we chose to move to this area, and we trusted that our elected officials would protect our well-being and most importantly, the value of our investment.

Professionally, I have worries over the environmental impact of this pit and the larger scale plans for numerous, additional pits proposed in the area. As a professional geologist, I am extremely concerned about the groundwater impacts that numerous gravel pits would expose the quality of our groundwater to. According to the paper, "Establishing a Recharge Area for Big Hill Springs, Alberta, Canada", written by Soren Poschmann from the University of Calgary in 2007, the proposed pit mine lies directly within the mapped "pre-glacial channel" aquifer (Figure 1) that is directly fed by the source water mainly from the area surrounding Cochrane Lake (Figure 2) and sources the springs that create the Big Hill Springs Provincial Park. As you can see on the attached figures, the discharge for the Big Hill Spring lies on the southern-most edge of the proposed open pit. Far too close to a highly protected, provincial area in my professional opinion. Additionally, the calculated age of the spring water at the Big Hill Springs Provincial Park is estimated to be approximately 6.36 years old (Poschmann, 2007) which geologically speaking is a very short recharge versus discharge time for groundwater. This would suggest that with multiple open pit gravel mines (with no soil or glacial till to act as the natural filter that we currently experience for our groundwater and the source water for the Big Hill Springs), we should expect to see a drastic, yet unknown disruption of water chemistry in the area. In the event that our opposition goes unnoticed, I have advised our water co-op to gather as much chemistry data as possible before hand so we can monitor these effects closely and hold our elected officials and owners of the mines accountable.

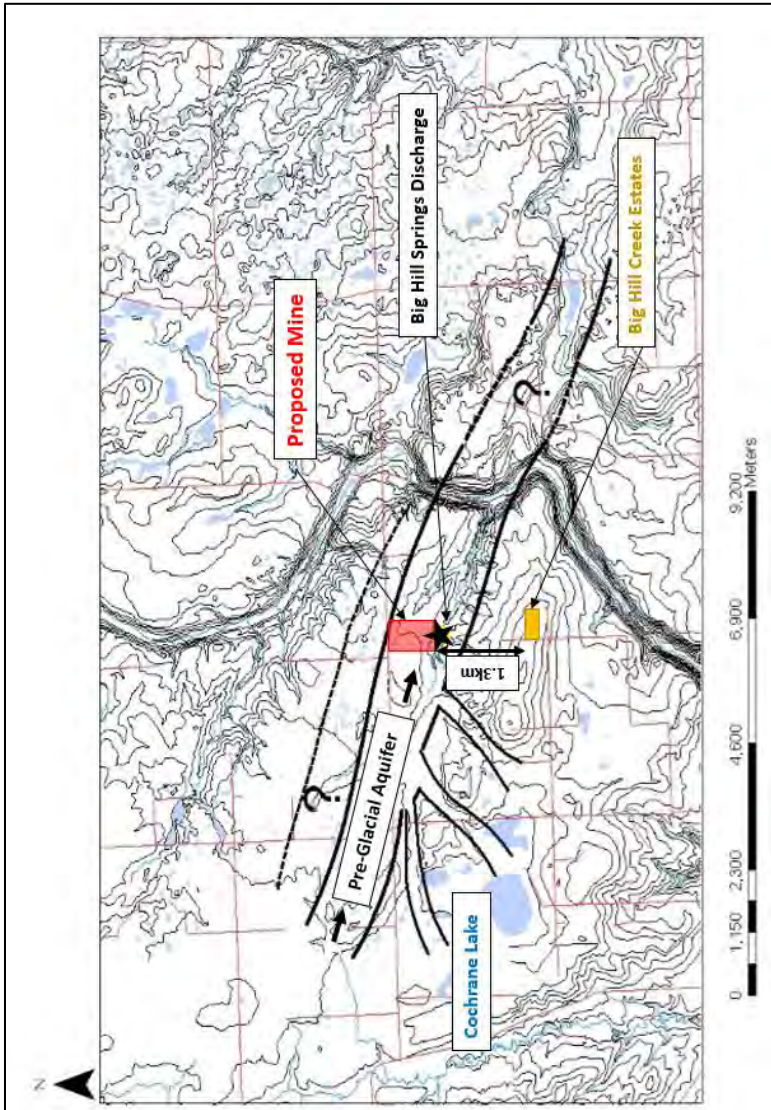


Figure 22: Location of preglacial channel. Dashed lines indicate boundaries that are not as certain. The source of Big Hill Springs is indicated with a yellow dot.

Figure #1

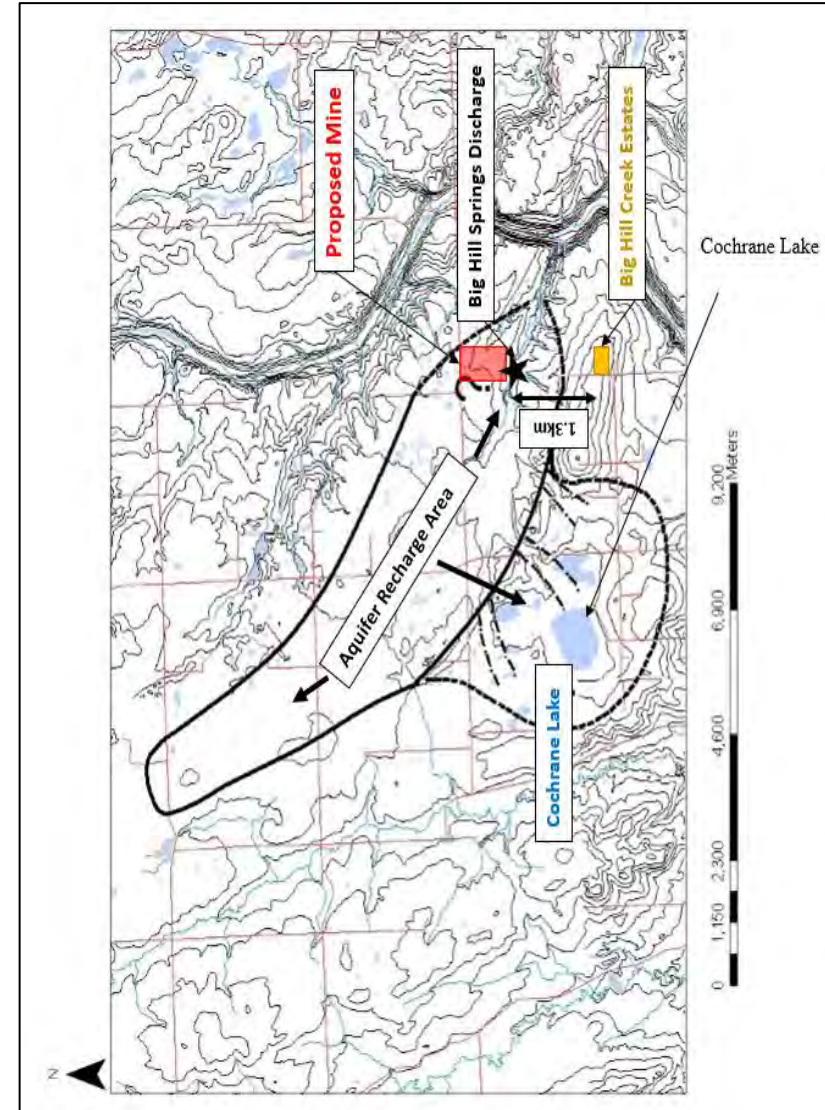


Figure 23: Watershed for Big Hill Springs. Areas in question are indicated by dashed lines. The source is indicated by a yellow dot. The dot-dashed lines are the locations of the tributaries of the preglacial channel.

Figure #2

As landowners in the immediate vicinity of the proposed pits, these are our two main concerns for opposing the projects. While we support economic progress and development, there are also other things to consider when approving so many surface mining operations in such a little time frame.

- 1) **Traffic and Public Safety.** It is anticipated that there will be 50 loaded trucks leaving the operation daily – this equates to 100 trips (loaded and unloaded) entering and exiting the facility on HWY 567. This road is inadequate in its acceleration and deceleration lanes as well as the lack of passing lanes on the large hills. This traffic combined with the truck traffic from existing pits is excessive on this road without major improvements and will cause congestion and dangerous driving conditions. Multiple extraction operations in this area will be exacerbated as time goes on causing congestion, pollution, more wear and tear on the roads, and greater potential for accidents. We can attest to this section of road already being a very dangerous stretch of highway.
- 2) **Lack of Area Structure Plan.** There are a variety of stakeholders in the area – residential, commercial, industrial, and a valuable Provincial Park. An over-arching framework is needed to shape future development of this growing area and provide clarity and certainty to stakeholders when making investment decisions. With aggregate operations, there are many projects in the area operating or under consideration. An effective ASP would shape the approval process for these operations providing more certainty to both residents and extraction companies. There is a unique Provincial Park in the area that could be greatly affected by further extraction activities and an ASP would ensure that the area be protected. We are rightly concerned that if this application is approved, it will open this rural residential community up to even more pits. There are currently eight quarter sections of land in the immediate vicinity of the park that are owned by aggregate extraction companies. The cumulative effects of all these operations have not been adequately considered.

We understand that aggregate is a very important resource for our province and essential to communities for construction of roads, hospitals, schools, businesses, and houses, but with such a proliferation of pits, and an overabundance of gravel coming right out of quarries located on more easily accessed roads, there is no need for another gravel pit. Especially one in such close proximity to a Provincial Park. Another gravel pit would drastically affect our ability to enjoy our properties that we have invested so much money and time into, decrease our property values by as much as 30%, and destroy the quiet, peaceful community in which we live. If a permit were granted, the negative impact that this pit would have on the environment and its inhabitants is irreversible. It would compromise the health and safety of our community and ruin the character of this unique community forever.

We thank you for taking the time to hear my concerns and hope you will take them into consideration when making your decision about the future of our community.

Sincerely,
Ryan & Lynette Carnegie

Michelle Mitton

From: Sean Gregory [REDACTED]
Sent: Friday, February 5, 2021 9:27 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Big Hill Springs Gravel Pit

Follow Up Flag: Follow up
Flag Status: Completed

Do not open links or attachments unless sender and content are known.

Hello,

You cannot proceed with the gravel pit bid that is so close to an amazing piece of land. The big Hill Springs provincial park is a historic place and digging a pit in proximity to it would be a tremendous loss.

We are supposed to have serene, peaceful and amazing places that celebrate the beauty of Alberta. You cannot taint such an amazing geology example that we have so close to home.

Please consider the cries from my fellow Albertans and CANCEL this bid. It would truly be a loss to everyone who has every enjoyed the park.

Thank you for your time,

Sean Gregory

Michelle Mitton

From: Serge Tessier [REDACTED]
Sent: Wednesday, February 10, 2021 4:17 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C-7987-2019

Follow Up Flag: Follow up
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Please see the attached letter re: Bylaw development. As residents affected by this Bylaw, we agree with all points and are not in favour of this development.

Serge and Tracey Tessier
 43207 Mount View Bay
 Cochrane, AB
 T4C 2B2

1. Water Usage- Where will this development source their potable and grey water? The town of Cochrane has limited water rights off the Bow river. Will there be a community well to provide for the ~800 residential units?- Will the surrounding acreage communities need to opt in, with anticipated increase to current tax rate?
2. Sewage Disposal- Where will the sewage be transported to? Will it be trucked? Will it be piped into Cochrane? Cochrane currently pipes into Calgary. Is the agreement in writing?
3. Garbage Disposal- Currently the acreage communities use the community chuck-wagon. Any change to community disposal, will that result in higher taxes for the acreage communities required to opt-in to the disposal
4. Traffic- Only way into Cochrane is through Hwy 22 1A interchange which is recognized by transport Alberta as being over-capacity with an improvement in the works. Will this community be developed prior to that work being done? Will there need to be a light on the intersection of Hwy 22 and Cochrane Lake Road?
 - a. For a community of 800 residential units with between 1600-2400 new residence is there a need for an emergency alternative route. Is there any development plan to access Horse Creek Road?
5. Emergency Services-
 - a. Fire- Mount View Estates had a grass fire in spring of 2020, that resulted in the near loss of several houses including our own. What is the plan for a fire response to the community?
 - b. Police- The current RCMP detachment is moving to vicinity of the heritage hills community in Western Cochrane. Is there discussions and agreements with the Province for requirement of additional policing to service a 'new village'.
6. Environmental- In the proposed development package I received I saw no environmental assessment of the impact to the wildlife in the area. There are multiple herds of deer, elk, moose in the area as well as coyotes, cougars, bears and lynx. What mitigation plans have been proposed to minimize impact to the wildlife?
7. Schooling- with 800 units that could result in many more school children. Is there additional school construction funds set aside for a community school or funds set aside to help augment the current existing schools.
8. Construction inconveniences- As there is only one route in and out of the development, ourselves and everyone who is west of the development will face multiple years of inconvenience, dust, noise and increased wear on our existing infrastructure. Is there a plan and funds to remediate and repair the anticipated damage. As well as a dust mitigation strategy during the dry windy days that we have the majority of the time in the area.

Sent from my iPhone

Michelle Mitton

From: Shara Hamilton [REDACTED]
Sent: Friday, February 5, 2021 6:03 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C8051-2020

Follow Up Flag: Follow up
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To whom it may concern,

I am absolutely devastated for your plans In destroying our environment. Adding a gravel pit in and around big springs will effect the wildlife, water safety and overall beauty of this area. How dare our government think this is acceptable. Please put a STOP to the proposed plans.

Shara Hamilton
10 Patina View SW,
Calgary, AB,
T3H 3R4,
Canada

Michelle Mitton

From: Sheena Bates [REDACTED]
Sent: Monday, February 15, 2021 2:34 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C-8051-2020 (Mountain Ash Application PL 20200031)

Follow Up Flag: Follow up
Flag Status: Flagged

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I am writing to express my opposition to the proposal for open pit mining so close to Big Hills Provincial Park. The location is in the headwaters of the aquifer which feeds the springs that make up the park, an aquifer that is significant and quite unique in Alberta. The province is currently spending a lot of money to fix up the park, as it is heavily used.

By allowing this project to go ahead there is real danger that permanent damage would be done to the park and its environs. We have seen, especially during this pandemic, that parks are most valued, and we do not have enough of them near large urban centres. Please don't allow anything to destroy, or potentially destroy, this unique park.

Thank you,
S Bates



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Michelle Mitton

From: GRAY [REDACTED]
Sent: Monday, February 15, 2021 7:40 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Big Hill Springs

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

It has come to our attention, that a proposal to allow a gravel pit close to the park at Big Hill Springs, is on the books. We can't comprehend, that a plan to allow a pit that close has even contemplated, never mind, got to this stage. We having going there for over 10 years now and spent many enjoyable, productive and educational hours there with our family and especially our granddaughter.

After seeing the degradation caused by pits and there lasting impact on the Oak Ridges moraine in Ont and other similar area. This is not the place to allow one. It will endanger the aquifer and have a negative and lasting impact on the area, especially the park! Dust, noise, various leakages of dangerous chemicals and petroleum products etc.

The provincial government is spending money to upgrade the park , to bring more enjoyment to the people and also provide more protection to the environs in and around the park , from the increased visitor usage, Allowing the pit, would undermine the whole process.

Next, would be all the heavy truck traffic in the area, in conjunction with increased visitor traffic, leading to potential safety issues on the roads & highways

In closing, No, No to this proposal and any future plans to try & open up pits or other commercial/industrial concerns around the park and over the aquifer/watershed.

Thank You, Yours
Terry Wood & family
Cochrane, AB

PS Please contact me at this email or [REDACTED] if you need personal details to verify , this is a legitimate letter & not part of a mass sending.

Michelle Mitton

From: Tim Jones [REDACTED]
Sent: Friday, February 5, 2021 5:59 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C8051-2020

Follow Up Flag: Follow up
Flag Status: Completed

Do not open links or attachments unless sender and content are known.

> Dear Rocky View County Council,
>
> Please do NOT allow an open gravel pit anywhere near the Big Hill Springs Provincial park. This area is very environmentally sensitive. Not only will it destroy the park but the dig will also contaminat the Big Hill Creek.
> This is a beautiful and special area enjoyed by thousands of Albertans all year round. We love the area!♥
>
> I do not support this!!!!
> PLEASE STOP THE GRAVEL PIT!!!
>
> Timothy Jones
10 patina view SW
Calgary, AB
>

Michelle Mitton

From: Velda Wheeler [REDACTED]
Sent: Wednesday, February 10, 2021 8:39 AM
To: Legislative Services Shared
Subject: [EXTERNAL] - bylaw C-8051-2020

Follow Up Flag: Follow up
Flag Status: Completed

Do not open links or attachments unless sender and content are known.

Good morning

I want to express my disapproval of this application for the Summit gravel pits along Hwy 567.

I have disagreed with these pit applications in the past and continue to disagree with them.

I'm tired of having to write to you every time they apply.

I don't think they should be allowed to continue to apply. Once disapproved that should be it.

We were working on a gravel plan and council scrapped it so now we have to write to you every time.

Please! No more pits along hwy 567!

Thank you

Velda Wheeler
[REDACTED]

Sent from [Mail](#) for Windows 10

Michelle Mitton

From: Victoria Brilz [REDACTED]
Sent: February 17, 2021 3:52 PM
To: Legislative Services Shared
Cc: kvenner@bapg.ca; koberg@bapg.ca
Subject: [EXTERNAL] - Bylaw C8051-2020
Attachments: Rocky View County residents voice.pdf; ATT00001.htm

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

To Whom It May Concern,

In regards to Bylaw C8051-2020, it is bewildering and concerning that responsible business professionals and trusted public representatives would consider enabling the Mountain Ash Limited Partnership to proceed with it's Summit Pit application.

As stewards of our environment, it feels irresponsible to allow a project of this nature to mine within a minimum of 1 meter above the groundwater table that feeds into the Bill Hill Spring that risks destroying one of only 2 known spawning grounds for the threatened Bull Trout and potentially destroying the trusted pristine quality of the spring water for thousands of visitors to the Big Hill Springs Provincial Park.

Perhaps a retainer to be held in trust for the irreparable damage this project could incur is a way to incentivize the business owner to conduct their business responsibly. How can we begin to put a value on this irreparable damage to nature and the health of park visitors? The retainer would be prohibitive to a financially viable model. It is time to hold business accountable and responsible for the true cost and risk to both the environment and it's profit margin.

Also, to B&A, this challenges my trust in and respect for B&A Planning group to provide responsible land use advisement. I question their advisement of other local projects in our area that impact sensitive eco-systems and a land owner's pocketbook.

I am deeply concerned with this application and opposed to it's acceptance as presented at this time.

Sincerely,
Victoria Brilz
260005 Mountain Ridge Place
Rocky View County, AB
[REDACTED]

CochraneTODAY.ca

Rocky View County residents voice concerns over gravel pit proposal

TYLER KLINKHAMMER

ROCKY VIEW— A collection of concerned residents have banded together to oppose a new gravel pit in Rocky View County.

Mountain Ash Limited Partnership's newest project, the Summit Pit, is currently in the application process with Rocky View County.

The parcel of land on which the gravel pit is located off of Highway 567— 800 metres from Big Hill Springs Provincial Park.

The park, nestled in a shallow valley roughly 10 km northeast of Cochrane, boasts riparian features, springs that feed the Bighill Creek, several waterfalls, the remains of a historic fish hatchery, the ruins of Alberta's first commercial creamery and hiking paths.

The watershed is a unique aquifer because it is spring-fed. The source of the stream is underground, so the temperature of the creek stays fairly constant in both the summer and winter months.

In July 2020, Alberta Parks announced it would be closing the park to visitors for much-needed refurbishments, costing roughly \$1.2 million.

The park was being loved to death by the visitors and sees roughly 250,000 visitors per year according to the Big Hill Creek Preservation Society.

The Friends of Big Hill Springs Provincial Park, the name the county residents have given themselves, say the project could cause irreparable damage to the sensitive ecosystem.

"It's approximately 800 metres away, and I live about a mile and a half from a gravel pit, and I hear their noise," said Harry Hodgson, one of the concerned residents. "If it goes ahead it's going to lessen the enjoyment of the park for everybody who visits it. The dust and the noise— It's not going to allow for full enjoyment of the park and the natural environment."

Hodgson said the dust released in these kinds of operations could potentially contain silica, a known carcinogen, and a material identified by the Canadian Centre for Occupational Health and Safety as highly toxic.

"Your nature walk will be to the sounds of industrial rock crushers, and instead of breathing in fresh air, it will be silica dust," he said.

The permit Mountain Ash has submitted to Rocky View County Council is to mine within "a minimum of 1.0 metres above the groundwater table," says the company's Master Site Development Plan.

At that level, Hodgson said he is concerned the mine would remove protective layers of organic and inorganic materials which would typically act as a filter and guard the aquifer against contamination.

And while Mountain Ash has installed 10 groundwater monitoring stations in and around the mining site, the wells "would only identify harmful contaminants in the aquifer after they have already entered the groundwater and traveled toward the Park," Hodgson said.

The aquifer has also been identified as one of only two known spawning grounds for bull trout between Calgary and the Ghost Dam Reservoir. Bull trout have been identified by the province as a sensitive species, and are officially listed as a threatened species under Alberta's Wildlife Act.

Ken Venner, land use consultant with B & A Planning Group, said the Mountain Ash project has other safeguards against groundwater contamination in addition to the monitoring wells.

"If in fact there is equipment being stored on the site for any length of time, there would be requirements to store that equipment on non-permeable surface material," Venner said.

Those non-permeable surfaces, such as a layer of compacted material built on a bed of sand, are meant to absorb and mitigate the effects of spills.

Venner also noted Mountain Ash is looking into monitoring pre-existing wells on the properties to the east and south of the project.

He said there are many procedures in place to mitigate the risk involved with this sort of operation and that Mountain Ash has undertaken "best in class" procedures to ensure the safety of the operation.

"I can't 100 per cent equivocally say that there's no risk— No risk more than an agricultural operator operating a piece of farm machinery on the landscape," he said. "I think what we're dealing with, the 40-acre at a time excavation area. This is not a widespread, extensive industrial operation. It's going to be contained, it's going to be phased, there are going to be tight controls."

The south end of the southern quarter of land on which the Summit Pit is located is an area that has been earmarked as a habitat preservation area by Mountain Ash.

Venner said the area slopes down toward a natural escarpment and a regional drainage that meanders through the area.

The area has been identified as gravel-free by Mountain Ash, and provides a buffer for the landown-

February 4, 2021 COCHRANE EAGLE - 11



An aerial view of Rocky View County.
FROM MOUNTAIN ASH LIMITED PARTNERSHIP'S MASTER SITE DEVELOPMENT PLAN

ers to the south.

The drainage area sits directly to the west of the beginning of the Big Hill Spring, which feeds the Big Hill Creek that drains into the Bow River.

Hodgson said the entire zone is an important recharge area for the aquifer, and forcing the spring to recharge through a "dramatically reduced protective filter" could expose it to "spilled machinery fluids, herbicides and harmful metals and trace elements released by the mining process."

Rocky View County is scheduled to hold a public hearing regarding the Summit Pit application on March 2, at 9 a.m. The meeting will be broadcast live via rockyview.ca/.

If you would like to voice your opinion on this issue, you are asked to email

legislativeservices@rockyview.ca and include Bylaw C8051-2020 in the subject line.

The deadline for submitting written letters for the public hearing is Wednesday (Feb. 17) at 4:30 p.m. The deadline for video submissions is Monday (March 1) at 12 p.m.

tklinkhammer@cochrane.greatwest.ca



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BVCU's Annual General Meeting

February 9, 2021 @ 4:00 pm

Virtual Event

Visit bowvalleycu.com or inquire
at your local branch for full details.



Michelle Mitton

From: Vivian Pharis [REDACTED]
Sent: Tuesday, February 16, 2021 11:02 AM
To: Legislative Services Shared
Subject: [EXTERNAL] - BCPS Submission to RVC Hearing March 2, 2021 Mt. Ash LP application for land redesignation
Attachments: BCPS Submission to RVC Hearing March 2, 2021.pdf; ATT00001.txt
Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

Dear RVC Councilors: Re: Bylaw C-8051-2020; PL 20200031

I respectfully submit the attached submission that I have spent many hours to research and write. I live at 193 Green Valley Estate, on the escarpment of Bighill Creek, just north of Cochrane. I have lived on this property for nearly 50 years, having bought land in 1971. I know this creek and park well and am also Vice President of Bighill Creek Preservation Society, a group dedicated to developing a watershed plan for the creek.

Vivian Pharis

Big Hill Springs - Not Gravel, but An Oasis on the Prairie

Submitted (PL 20200031) February 2021 by RVC resident, Vivian Pharis

Vision

Big Hill Springs Provincial Park is no ordinary park. This tiny gem was set aside in the 1950's as one of Alberta's first parks, apparently on land donated by Senator Patrick Burns. Since the 1920's people have been drawn to the prairie oasis at Big Hill Springs for picnics, fishing and camping. The attractive tumbling waters, where Grasslands meet Foothills and Parkland ecological regions, has drawn many admirers who have, between the 1950's and 2020, repeatedly called to better protect the springs and expand the park.

Over thousands of years, Big Hill's high-volume mineral springs laid down unusual tufa formations which are the foundation for uncommonly beautiful falling waters that flow on to form the main volume of Bighill Creek. Today this 70 acre park draws 1/4 million annual visitors and overuse is a constant threat. But, as the centre of a larger interpretive park and conservation area, Big Hill Springs could become a tourist attraction unique in southern Alberta.

Rare opportunities exist to expand the park north to connect to a larger conservation area, east to incorporate a picturesque buffalo jump with high interpretive value, west to properly protect and interpret the springs that rank among the top four mineral springs in Canada, and south-west for 6 km along a pathway through a sandstone-studded, steep-sided glacial coulee, leading all the way to Cochrane. Interconnecting pathways could join Big Hill and Glenbow Ranch Provincial Parks. Recreation, nature appreciation and tourism opportunities abound.

RVC's Need for Parks:

- RVC is the most populous county in Alberta; people are attracted to it for "a country lifestyle" based on proximity to nature.
- RVC reports and plans recognize that the primary recreational needs of residents are **walking paths, interconnected trails and nature appreciation**, including: 2018 County Plan, 2020 Rocky View Recreation Needs Assessment Study, 2011 Parks and Open Space Master Plan and draft 2021 Rocky View Municipal Development Plan.

- Provincial parks make up 0.4% of RVC's 1481 sq mi land base, with the 0.15 sq mi Big Hill Springs Provincial Park being the smallest, yet supporting 1/4 million annual visitors.
- The demographics of RVC are older, with almost half being 45+ years and this trend is expected to increase; older people especially recreate by walking and nature appreciation.

Big Hill's Unique Attributes:

- Big Hill Springs Provincial Park has attributes of national significance, including springs that rank amongst the "top four mineral springs in Canada", yet today they are unrecognized and neglected.
- The spring's high water volume (84 L/s), their constancy of volume, their year-around temperature constancy and the rare tufa formations that have built up over 1000's of years, bestow national and provincial significance.
- The federal Department of Fisheries and Oceans (DFO) has ranked the springs and park area as critical habitat for threatened Bull Trout under the Species at Risk Act (SARA).
- Bighill Creek Protection Society, a local watershed group working to develop a watershed plan for the Bighill Creek Basin, has conducted six different scientific assessments of the creek in the past 5 years, that support the goal of reintroducing endangered native Bull Trout and West Slope Cutthroat to the creek.
- The park is provincially unique because it is one of Alberta's only sites protecting an example of the Foothills-Parkland Subregion and supports a broad assembly of plants and animals associated with Grasslands, Foothills and Parklands.
- Bighill's steep-sided valley and open landscapes to the north, support surprising numbers of wildlife, including moose, elk, mule and white-tailed deer, black and grizzly bears, wolves, coyotes, foxes, mink, weasels, skunks, porcupines, red squirrels, ground squirrels, and in the bird world, rare piping plovers, a blue heron colony that is over 100 years old, peregrine and prairie falcon nesting sites, sharp tail grouse leks and many raptor and song bird species. Even raccoons and bob cats have been caught recently on area wildlife cameras.

Gathering water samples on Bighill Creek downstream of Big Hill Springs Provincial Park, showing buffalo jump immediately east of park.



- Buffalo jumps, bone piles, pictographs and lithic tools are all found in the immediate area. The area has great potential for further archaeological examination and interpretation.
- Historically, Alberta's first creamery was sited near the springs in 1891, and operated 19 years, supplying Calgary, rail lines, forestry operations and local residents.
- An early fish hatchery was built to take advantage of the reliable waters that flowed year-around and maintained a constant temperature.
- The glacial coulee that stretches about 6 km from Bighill Springs Provincial Park to Cochrane, passes through dramatic scenery where wildlife is varied and abundant. The decommissioned roadway through the coulee remains a public asset that would require little monetary outlay to open it as a walking/cycling trail. Indeed, this is a stated goal in RVC's 2011 Parks and Open Space Master Plan.

Advantages of Park Expansion:

- Provincial parks contribute to the environmental, social and economic well being of Albertans, including RVC residents wanting more local recreational opportunities.
- 2017 figures indicate provincial parks contribute \$1.2 billion into Alberta's annual economy and provide 23,480 years of employment.
- Bighill Springs Provincial Park, with no advertising, draws 1/4 million visitors annually. Its proximity to Airdrie, Cochrane and Calgary put it within easy reach of over 1.5 million.
- With expansion, more trails and picnic sites, interpretive facilities for natural, historical and archaeological features, and major trails linking the park to Cochrane and to Glenbow Ranch Provincial Park, Big Hill has enormous long-term recreational, educational and tourism potential.
- The proximity of the site to three population centres and its gentle topography mean the park could operate on a year-around basis.
- The spin-off potential for local businesses due to increased tourism is substantial.

The Challenge:

- Four gravel operators have acquired eight quarter sections or two square miles of land in the immediate vicinity of Big Hill's springs and park that threaten to destroy the ancient aquifer the springs rely upon. For certain, they will impact the water to the springs. The first of these potential mines will be considered for approval at an RVC hearing March 2, 2021. RVC has a history of approving gravel operations with minimal examination of their environmental and social impacts. Gravel deposits underly much of RVC, many not associated with critical water ways.
- The public has only one opportunity to influence a county decision on a gravel operation. This comes early, at the land designation stage. If this opportunity is missed, the public has no further recourse to the remaining steps in approving new mines. The public is then left to challenge problems only if they arise during operations. In the situation where a very vulnerable and rare aquifer is concerned, where endangered species are at stake in the waters, and where clean, reliable drinking water could be impacted, there is every reason for sober second consideration of an impacting development.
-
- Calgary's mayor, Naheed Nenshi, is right now raising the alarm about declining water availability as populations increase and climate change takes a toll. He describes the need to shorten water supply lines, concentrate community living and redouble conservation efforts. There are implications for RVC. There are also obligations on counties to maintain tributary water quality and flow rates wherever possible. Putting these in jeopardy through gravel mining would be a questionable trade-off, needing thorough examination.
-

Rocky View County Parks and Open Space Master Plan:

- Two Management Plans have guided operations of Big Hill Springs Provincial Park, one from 1976 and one from 1998. These and older documented evidence have described this small park as “overused”, suffering from erosion and needing expansion. Indeed, in 2011, the public again made this point through input to RVC’s Parks and Open Space Master Plan, where there is a call to: **“Identify and protect Big Hill Springs Creek and the creek valley north of Big Hill Springs Provincial Parks as a conservation area; and Secure the road allowance to Big Hill Springs Provincial Parks for public access.”**
- As part of the plan’s **Grand Valley Foothills Concept Plan**, is a trail proposal: *“A pathway follows Big Hill Springs Road from Range Road 34 to Highway 22; a pathway starts from the City of Calgary at Nose Hill Parkway to Camden Lane and continues west to Big Hill Creek to Cochrane. A branch of this pathway follows Big Hill Creek to Big Hill Springs Provincial Park and continues north to Big Hill Springs Road.*

Conclusion:

Rocky View County has a clear need to provide greater trail and park facilities for its residents, many of whom moved here for these very amenities. County plans and various reports recommend that natural spaces be protected, interconnecting trails be developed and new parks be designated. But, despite planning exercises, reports and recommendations for action, so far little has been accomplished in the 50 years I have lived in RVC. Big Hill Springs Provincial Parks has just undergone a \$1.2 million renovation that did not include expansion or protection for the vital springs. The 1998 management plan for the park contains a commitment that the park will work cooperatively with RVC for park area improvement. Expansion of this park and trail system would be a cost-effective and very responsible undertaking that could trigger a range of environmental, social and economic benefits for RVC. But, **all this will be lost if gravel pits destroy the springs, which are the golden goose, and dust and noise and truck traffic drive park visitors away.**

References:

Armstrong D, Gow and Meikle W. 1998. Big Hill Springs Provincial Park Management Plan. 25 pages.

Blogorodow P. 1976. Big Hill Springs Provincial Park Mini Master Plan. 55 pages.

Hargroup Management Consultants, 2011. Rocky View County Parks and Open Space Master Plan. 111 pages.

Houseknecht, S. 1984. Natural history study of mineral and thermal springs in Canada. Vol.1. Study commissioned by Parks Canada; Terra Environmental Consultants Ltd.

Sutherland I. 1998. Ecological Land Classification of Big Hill Springs Provincial Park. 35 pages.

Michelle Mitton

From: Vivian Pharis [REDACTED]
Sent: February 16, 2021 3:09 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Wildlife Corridor Submission to Mt. Ash Hearing, March 2, 2020
Attachments: BCPS Wildlife Corridor Submission.pdf; ATT00001.txt

Follow Up Flag: Follow up
Flag Status: Flagged

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As per bylaw C-8051-2020, PL 20200031, Application by Mt. Ash PL for land redesignation from agricultural to industrial for the purpose of a gravel pit.

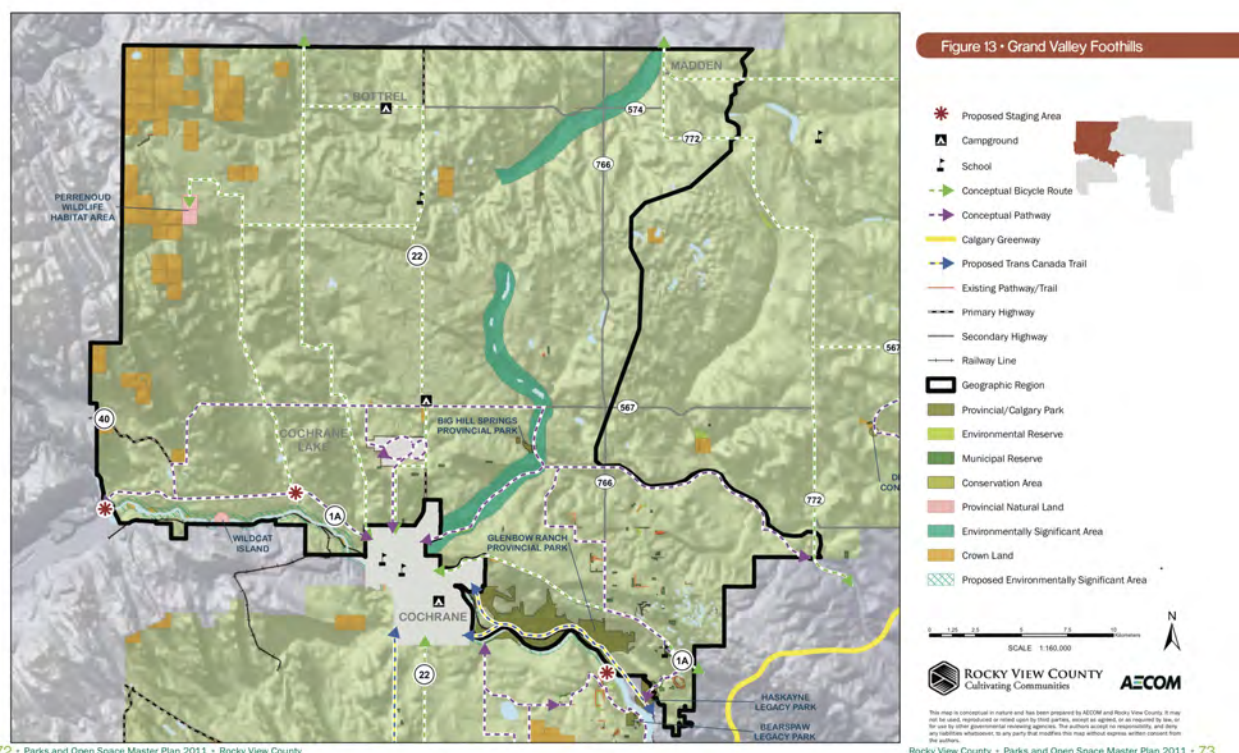
Submitted by Vivian Pharis - 193 Green Valley Estate, RVC

Submission to Bylaw C-8051-2020, PL 20200031, Application by Mt. Ash LP to redesignate agricultural land to industrial for purposes of gravel mining.

This submission is designed to show the importance of maintaining Bighill Creek, its critical springs and the provincial park that depend on the valley and the springs, as significant and rare intact habitat for the free-flow of biological organisms within Rocky View County.

Biological corridors are critical for the maintenance of ecological processes including allowing for the movement of organisms and the continuation of viable populations. By providing landscape connections between larger areas of habitat, corridors enable migration, colonisation and interbreeding of plants and animals.

The map below is taken from RVC's 2011 Parks and Open Space Master Plan, which was based on earlier work done by the provincial Environmentally Significant Areas program. It indicates the presence of a significant inter-connected environmentally sensitive corridor connecting the Bow River, up through Bighill Springs Valley and on to Nose Hill and Dog Pound drainages and interspersed natural sites amongst agricultural land.



The “Grand Valley Foothills” stand out amongst RVC’s five geographic regions as the only region with an opportunity for interconnecting wildlife and all local biological organisms with important natural landscapes. Nowhere else in RVC is there a similar critical corridor - this one is unique and precious and not the place for industrial developments.

RVC in the Global Biodiversity Context

According to the 2019 Global Risks Report, biodiversity loss and ecosystem collapse are amongst the greatest risks facing society. Biodiversity underpins human life and is responsible for ecosystem services that we fully depend upon, including food production, crop pollination, clean water, nutrient and waste recycling and regulating climate change. Humans depend on ecosystems for our economic sustainability as well as sustaining our physical and mental health.

The United Nations is calling on all countries to protect 30% of their natural landscapes by 2030 and Canada has committed to protecting 25% by 2025. Such protection has to include responsibilities at the municipalities level or it will fail. Failure means disaster for **ALL** life on this planet. RVC needs to develop policy addressing biodiversity health.

RVC Wildlife Obligations

Corridors for biodiversity serve a number of purposes including protecting wildlife and helping animal populations thrive. They function as means to decrease human-animal conflict in the form of vehicle-animal collisions and help combat the negative effects of habitat fragmentation.

There are possibilities for identifying and establishing key interconnecting corridors linking the two biologically active valleys of the Bow River and Bighill Creek. Highway 1A between Calgary and Cochrane is recognized as the most notorious large animal killing route in Alberta, because it is such an important connector between these two valleys. It is incumbent upon RVC to stop this highway slaughter and conserve wildlife through identifying, establishing and maintaining movement corridors between the two valleys and across the highway. These north-south corridors go on to connect with those identified as significant, through the length of Bighill Creek and beyond.

Threats to Bighill Creek Key Biodiversity Corridor

Today 4 gravel mines are proposed on lands immediately NW of the nationally significant springs that are the crux of Big Hill Springs Provincial Park. These springs contribute 50% of the water that flows through the creek that enriches the steep-sided coulee with its rich habitats on either side, all the way to Cochrane and the Bow River.

Industrialization of an important component of the Bighill Creek Biodiversity Corridor not only threatens the viability of the unique springs and the provincial park that depends upon them, but of critical habitat for the endangered Bull Trout, the enjoyment of thousands of park visitors and a key connection route for many wildlife and plant species that depend on the area to move through.

Rocky View County has to date neglected both its remaining natural landscapes and its residents who move to the county looking for natural spaces, interconnecting nature trails and park provisions. Four new gravel mines covering 2 square miles located on the aquifer of the springs that feed

the park, could not be in a more environmentally sensitive place in all of RVC.

Conclusion

There is no doubt in my mind and likely the minds of most RVC residents that gravel mines on rare aquifers and on the most environmentally sensitive biodiversity corridor in all of RVC, are truly inappropriate. RVC is underlain by a great deal of gravel. There have to be less sensitive sites for the mining of gravel, certainly sites that are not atop ancient aquifers or within critical wildlife corridors.

Submitted by
Vivian Pharis
193 Green Valley Estate, RVC
February 16, 2020

Rocky View County

File number 06731002/1004

Application Number PL202200031/34

On behalf of the residents of Big Hill Creek Estates, a community directly south of the proposed site.

As such we have a number of concerns about these developments:

- The current notification zone for the pits is 1.6Km's from the property line of the pit; we would like to see that zone extended south to include our community.
- Added as a member of the stock holders committee.
- Added as a member of the Good Neighbour committee.
- Added to the notification call list for times when decibels levels are expected to exceed 65 decibels. What type of noise monitoring will be in place?
- We foresee a requirement for some kind of an elevated berm c/w a shelter belt along the South elevation that should assist in mitigating dust and provide an visual backdrop. Our community is at a much higher elevation than the development and line of sight needs to be addressed.
- We are dependent on our well and as such want to be included into the well monitoring program.
- We will require access to the website for the Joint Community Commitments.

We would also respectfully request the following reports

- Emission mitigation and monitoring program.
- Storm water management plan
- Hydro geotechnical impact assessment
- Erosion and sediment control plan
- Weed control plan
- President of Canadian Highways Institute – John Morrall's report on the effects of gravel pit traffic using highway 567 & 766 and the community.
- Communication plan...for neighbouring residents.
- Alberta energy regulators – directive 038 – noise control.
- Noise mitigation and monitoring plan.
- Ground water monitoring /neighbouring wells monitoring plan
- Code of best practices for the pit

If the requests listed are in public record please provide a link to the site so we may access them.

Regards,

Big Hill Creek Estates

PAT LAHEY #27
P. Lahey

Rocky View County

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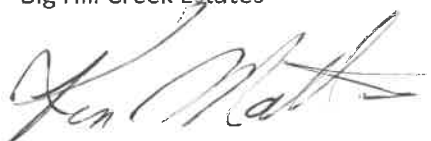
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Big Hill Creek Estates



11 Big Hill Creek Estates

Rocky View County

File number 06731002/1004

Application Number PL202200031/34

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Regards,

Big Hill Creek Estates

M. B. B. , 3 Big Hill Creek Estates
[Signature]

Rocky View County

File number 06731002/1004

Application Number PL202200031/34

On behalf of the residents of Mountain View Estates, a community directly South West of the proposed site.

As such we have a number of concerns about these developments:

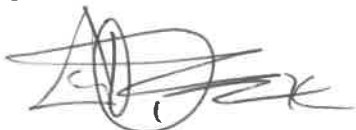
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Regards,

A handwritten signature in black ink, appearing to be 'L. J. ...', written over a circular stamp or mark.

Rocky View County

File number 06731002/1004

Application Number PL202200031/34

On behalf of the residents of Big Hill Creek Estates, a community directly south of the proposed site.

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Regards,

Big Hill Creek Estates


Ryan Carnegie #7 Big Hill Creek Estates

Rocky View County

File number 06731002/1004

Application Number PL202200031/34

On behalf of *Brent & Katty Yuers, 264116 Range Road 40*

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- We are dependent on our well and as such want to be included into the well monitoring program.
- We will require access to the website for the Joint Community Commitments.

We would also respectfully request the following reports

- Emission mitigation and monitoring program.
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- Code of best practices for the pit

If the requests listed are in public record please provide a link to the site so we may access them.

Regards,

Kyuers



Rocky View County

File number 06731002/1004

Application Number PL202200031/34

On behalf of the residents of Big Hill Creek Estates, a community directly south of the proposed site.

As such we have a number of concerns about these developments:

- The current notification zone for the pits is 1.6Km's from the property line of the pit; we would like to see that zone extended south to include our community.
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Big Hill Creek Estates

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Allison Palmer
Big Hill Creek Estates

Rocky View County

File number 06731002/1004

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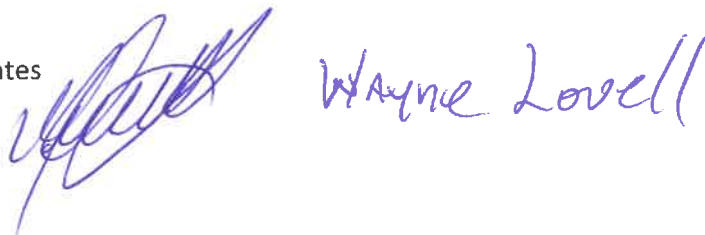
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Big Hill Creek Estates



Wayne Lovell

Rocky View County

File number 06731002/1004

Application Number PL202200031/34

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Big Hill Creek Estates

#19

CORNEIL & MURIEL
WYNNOBEL

Rocky View County

File number 06731002/1004

Application Number PL202200031/34

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Big Hill Creek Estates

Heather Kravitz
Heather Campbell

Rocky View County

File number 06731002/1004

Application Number PL202200031/34

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Big Hill Creek Estates

Mark Lowerson 51 - Big Hill creek estates
Mark Lowerson

Rocky View County

File number 06731002/1004

Application Number PL202200031/34

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#31 Big Hill Creek Estates

Big Hill Creek Estates


Leah Pearce


Mark Pearce

Rocky View County

File number 06731002/1004

Application Number PL202200031/34

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Regards,

Big Hill Creek Estates



Jessica Anderson

From: Michelle Mitton
Sent: November 26, 2020 2:34 PM
To: Jessica Anderson
Subject: FW: [EXTERNAL] - Opposition to proposed bylaw C-8051-2020

Follow Up Flag: Follow up
Flag Status: Completed

MICHELLE MITTON, M.Sc

Legislative Coordinator | Municipal Clerk's Office

ROCKY VIEW COUNTY

262075 Rocky View Point | Rocky View County | AB | T4A 0X2

Phone: 403-520- 1290 |

MMitton@rockyview.ca | www.rockyview.ca

This e-mail, including any attachments, may contain information that is privileged and confidential. If you are not the intended recipient, any dissemination, distribution or copying of this information is prohibited and unlawful. If you received this communication in error, please reply immediately to let me know and then delete this e-mail. Thank you.

From: Michelle Balmer [REDACTED]
Sent: November 25, 2020 4:29 PM
To: Legislative Services Shared <LegislativeServices@rockyview.ca>
Cc: Pat Lahey <plahey@hopewell.com>; Prez BHCE <prez4bhce@gmail.com>; Treasurer BHCE <treasurer4bhce@gmail.com>; Les Facca [REDACTED]; Kevin Bartsch [REDACTED]
Subject: [EXTERNAL] - Opposition to proposed bylaw C-8051-2020

Do not open links or attachments unless sender and content are known.

To Whom It May Concern,

Firstly, TODAY at 4pm I received a letter from Rocky View County with a deadline of 4:30pm TODAY to object/support the above noted bylaw. This is in no way a reasonable amount of time within which to formulate a reasonable submission but I am sending this regardless to express my opposition.

My family lives at 3 Big Hill Creek Estates.

Our Legal land description is: Lot 1 Block 1 Plan 7910710 SW 1/4 Sec 30 Twp 26 Rge 3 W5

Owners: Kevin Bartsch and Michelle Balmer.
 [REDACTED]

In addition, I am on the Executive of our Water Coop - representing 15 properties at Big Hill Creek Estates.

Please note that residents of Big Hill Creek Estates Community Association have previously provided written submissions on the proposed gravel pits described above, noting our concerns. None of our concerns have been addressed to date except to send vague website information that does not answer our questions nor address our

concerns. As such, I would expect that all residents would be able to provide submissions at the public hearing on/after December 8, 2020.

Our primary concerns with the proposed development are:

1 - Noise - we are close to the proposed pits (approx 1.5 miles) and do not feel adequate noise reduction has been considered. We live on our rural properties to enjoy the peace and serenity that nature provides. We don't wish to hear the constant hum of gravel extraction or the constant traffic of gravel trucks. We feel the need for adequate monitoring of noise levels on a continuous basis and consideration for the distance this noise travels. We also feel it's important for a visual and noise reduction berm on the south side of the proposed development.

2 - Dust - we don't wish to be exposed to potentially health-compromising dust associated with aggregate extraction. We also don't want to be sweeping off our properties regularly.

3 - Water. We rely on well water for our drinking water. It's imperative to the value of our properties and our health and safety that our drinking water quality is maintained and our aquaphor remains consistent. We believe the company should have to monitor our water - we expect a baseline measurement of both water volume and water quality and a continuous monitoring of such to assess any impact that this development is having on our aquaphor.

We have also laid out other concerns in previous communications however with 3 min to go until your submission deadline, I don't have time to reiterate them now.

Please contact me for further steps.

Sincerely,

Michelle Balmer

Jessica Anderson

From: Rhonda Pusnik
Sent: Monday, July 06, 2020 1:49 PM
To: Matthew Wilson; Dominic Kazmierczak; Jessica Anderson
Subject: FW: [EXTERNAL] - Planning Services File No. PL20200031-4

Please see below a comment submitted through the website.

Thank you,

RHONDA PUSNIK

Executive Assistant | Community Development Services

ROCKY VIEW COUNTY

262075 Rocky View Point | Rocky View County | AB | T4A 0X2
Phone: 403-520-3933 | Cell: 403-466-5367 | Fax: 403-277-3066
rpusnik@rockyview.ca | www.rockyview.ca

This e-mail, including any attachments, may contain information that is privileged and confidential. If you are not the intended recipient, any dissemination, distribution or copying of this information is prohibited and unlawful. If you received this communication in error, please reply immediately to let me know and then delete this e-mail. Thank you.

From: Christine Harrison <CHarrison@rockyview.ca>
Sent: July 6, 2020 12:58 PM
To: Rhonda Pusnik <RPusnik@rockyview.ca>
Cc: Pamela Tilley <PTilley@rockyview.ca>
Subject: FW: [EXTERNAL] - Planning Services File No. PL20200031-4

Hello Rhonda,

Please see email below, I would have sent it to Belen but she is away, should I forward it to her anyway? As she is back on Wednesday?

What are your thoughts.

*Thank you,
Chris.*

From: Grauer, Lori [REDACTED]
Sent: July 6, 2020 12:52 PM
To: Questions <questions@rockyview.ca>
Cc: Division 9, Crystal Kissel <CKissel@rockyview.ca>
Subject: [EXTERNAL] - Planning Services File No. PL20200031-4

Do not open links or attachments unless sender and content are known.

July 6,2020

To Whom it may concern

We are concerned that the county is moving forward with the approval of this land re-designation considering an appeal process is before the courts currently. Would it not be prudent on the council's part to wait until a decision has been made by the courts. Summit and several other gravel operators are all involved with this court proceeding. We would appreciate any further progress be put on hold until the courts have made a decision.

Thank you to the attention to this matter.

Doug and Lori Grauer

271004 Range Road 40
Rocky View, Ab.

████████████████████

Michelle Mitton

From: Harry [REDACTED]
Sent: February 16, 2021 5:18 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C8051-2020

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

Harry Hodgson
 265201 Rge Rd 35
 Rocky View County, AB
 T4C 3A2

I OPPOSE the Mountain Ash Summit Gravel Pit Bylaw C8051-2020.

I live less than 800 meters east of the proposed pit. I will be expected to live with the dust, noise, traffic safety issues, water concerns, property value and general reduced lack of enjoyment of my property. The dust and noise can be reduced but not eliminated. Hazardous dust and noise travels for miles. I will be expected to live with the silica dust, a known carcinogen, and the constant noise. This will lesson the enjoyment of my home if I am unable to hold a normal conversation outside while breathing in the silica dust generated.

They plan on digging a hole 25 meters, half mile wide and almost a mile long. Just by digging the hole and removing the overburden/filter material the exposed gravel from normal aggregate operations will release harmful metals and trace elements such as selenium, arsenic, lead, plus others. Studies show turbidity or worse generated by aggregate operations can travel for miles in the groundwater.

I have not been provided any insurance or guarantee from the applicant that my water well will not be affected and if they do any damage who will be responsible? If the groundwater is affected, drilling a new well is not going to fix it. Who will be responsible for providing potable water and filtering for the life of my property.

Will I be compensated if I have to sell my house for a reduced rate because nobody wants to live next to a gravel pit?

Gravel companies in the past have provided assurances if your well or property value is affected that they will compensate the landowner.
 FROM MOUNTAIN ASH, NOTHING.

The application proposes to extract gravel to within three feet of the local aquifer even though the water table fluctuates by more than this amount between seasons. As a result, there are significant risks of permanent environmental damage for which there could be no effective mitigation.

Environmental damage would negatively impact local wells, the Springs, the entire Big Hill Creek drainage area, and subsequently the Bow River. These risks are too great to permit gravel extraction in such an environmentally sensitive area. Damage to these environmental resources would also cause irreparable harm to the Provincial Park and Creek.

Does not take a brain surgeon to figure out if this pit is allowed upstream within the Big Hill Spring aquifer recharge area, the spring/creek water will be affected. Killing this ecosystem within my lifetime is a distinct possibility.

TWO RECOGNIZED HYDROGEOLOGIST EXPERTS SAY IT SHOULDN'T GO HERE.

One in 2014 during a public hearing for another pit in this vicinity(which got turned down) and again now.

It is recommended that NO development within 1.6km and an additional 1.6km further that goes no closer than 4 meters above the high water level.

My life and visiting the Provincial Park will not be the same if a gravel is allowed to proceed approximately 800 meters away. Your nature walk and my life will be to the sounds of industrial equipment, rock crushers and instead of breathing in fresh country air, it will be silica dust.

This is one of only two provincial parks in Rocky View County and at a time when we need more natural areas, locating a gravel pit next to is inconceivable. The province is scheduled to spend \$1.2 million to refurbish and your decision will be effecting 250,000 annual visitors.

The application also provides no meaningful information on the cumulative impact of multiple gravel pits. This is a critical shortcoming given that there are other gravel pits already in the general area and more have been proposed.

Rocky View County has generous gravel resources in locations that would be far more appropriate for exploitation. There is no need to satisfy the region's need for gravel by potentially destroying valuable environmental sensitive resources.

- MOUNTAIN ASH HAS **NO** DOWN STEAM WATER STUDY
- **NO** ACCUMULATIVE DUST STUDY
- **NO** ACCUMULATIVE NOISE STUDY
- **NO** ACCUMULATIVE TRAFFIC STUDY
- AND **NO** COMMUNITY SUPPORT, **STOP THE PIT NOW!**

Harry Hodgson
Local Resident

Michelle Mitton

From: Harry Hodgson [REDACTED]
Sent: February 16, 2021 11:58 AM
To: Legislative Services Shared
Subject: [EXTERNAL] - BYLAW C8051-2020 Traffic
Attachments: GRAVEL TRUCK OPERATIONS FINAL REPORT.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

265201 Rge Rd 35
 Rocky View County, AB
 T4C 3A2

I OPPOSE the Mountain Ash / Summit Pit application bylaw C8051-2020.

We have hired a traffic consultant and he reviewed the applicants traffic assessment.
 Report assessment prepared by John Morrall, ENGINEER AND TRAFFIC CONSULTANT.

- PRESIDENT OF CANADIAN HIGHWAYS INSTITUTE LTD.
- EMPLOYED at the highway institute for OVER 20 YEARS
- INVOLVED IN TRAFFIC AND TRANSPORTATION with OVER 50 YEARS OF TRAFFIC EXPERTISE

“did not have sufficient information to approve the land use redesignation.”

“ There has been numerous accidents and a death involving gravel trucks along this section of highway, adding more trucks with the current overall road network is UNSAFE.”

Major safety issues and concerns:

- **failed to cumulatively include other nearby developments**
- **fails to look at the overall road network safety issues**
- **understated expected daily two-way trips of heavy trucks**
- **number of trips estimated still seems low**
- **understates the number of heavy trucks in the traffic stream during peak periods**
- **no mention of other critical road network issues that exist today for example:
 concealed intersections,
 steep grades,
 inadequate intersection site distances,
 narrow shoulders,
 other road users,
 school bus operations,
 solutions for platooning**

In my opinion, the applicant looks to be manipulating the data in favor of support but did not provide sufficient information to approve the land use redesignation. Adding more gravel trucks to an already busy road and having the pit entrance on range road 40 is extremely UNSAFE. Range road 40 is a correction line and the only way to safely control this intersection would be with traffic lights. This is a highway , traffic lights are not wanted. Therefore land use redesignation should be **DENIED**.

Harry Hodgson
Local Resident and member of
Friends of Big Hill Springs Provincial Park.

**REVIEW OF TRAFFIC IMPACT ASSESSMENT REPORTS
SUBMITTED IN CONJUNCTION WITH
THE LAND USE REDESIGNATION APPLICATIONS, and MASTER SITE DEVELOPMENT
PLANS OF LAFARGE, MCNAIR and SUMMIT (defined within)**



Prepared for: CARSCALLEN LLP

December 2017

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1.0 EXECUTIVE SUMMARY

The focus of this report is the review of three Traffic Impact Assessment (TIA) studies accompanying three separate applications for land use redesignation within Rocky View County and to determine if the TIAs contained sufficient information to enable the County to approve the land use redesignations. The TIAs reviewed are basically an analysis of intersection operations based on given, and possibly understated, assumptions of gravel truck haul trips. The TIAs focus on single gravel pit accesses to the road network and do not take into account properly the cumulative effects of additional pits coming on-stream. More importantly, the TIAs do not account for the overall impact of gravel hauling on the safety and operations of the entire highway network including other road users such as school buses, overloads, other vehicle types and trip purposes such as the movement of farm machinery and cyclists.

In addition, the documents encompassing the TIAs and guiding the land use redesignation applications, the Aggregate Master Site Development Plans, were also reviewed. While the three developers organised themselves into the Big Hill Springs Aggregate Producers Group and attempted to produce an aligned approach to the development of the three proposed gravel pits, the Joint Transportation Strategy (JTS) still lacked in addressing overall road network concerns and seemingly still understated the number of gravel hauling trucks that would be generated by the proposed developments.

Further, this study examines the safety and operations of the highway network that would be impacted by the addition of heavy trucks generated by the proposed developments, which were not considered by the TIAs or the MSDPs. In summary, this study has concluded the following:

- The TIA reports look only at the impact of a single gravel pit development on the road network and fail to cumulatively include other nearby developments or future planned developments.
- The TIA reports focus narrowly on discreet intersections and often fail to look at the overall road network safety issues, in this case the road network that includes the complete haul routes for the gravel pits.
- The effectiveness of the TIA depends on the accuracy or the completeness of the data used to build the model. In the case of the three TIAs reviewed, potentially understated expected daily two-way trips of heavy trucks generated by the proposed development will minimize the magnitude of needed improvements to the road network.
- Planning for aggregate pits should assume a realistic maximum production even though owners may initially work at a reduced rate of production.

- Numbers provided by the developer, which form the basis of TIAs, should be closely vetted against other applicants and/or nearby operating gravel pits, if available, to ensure accuracy. Alternatively, the road authorities themselves- Rocky View County and/or the Province of Alberta- could provide these numbers to the developers.
- The JTS improved slightly over the original TIAs in estimating daily two-way truck trips generated by the gravel pit developments, however, based on comparison with operating pits and to an economic analysis the number of trips estimated still seems low.
- The JTS states estimated daily two-way heavy truck trips generated by the gravel pit developments as an average, which understates the number of heavy trucks in the traffic stream during peak periods.
- Cumulative impacts on the greater network are mentioned within the JTS, such as intersection improvements on the greater network and to the requirement for climbing lanes, however, analysis of these issues are all deferred to future subsequent development permit applications.
- There is no consideration for other critical road network issues that exist today such as concealed intersections, steep grades, inadequate intersection sight distances, narrow shoulders, other road users, school bus operations, solutions for platooning.

The TIA reports and MSDPs, submitted by the Applicants and relied upon by Rocky View County, did not have sufficient information to approve the land use redesignation.

This study has concluded that the Traffic Impact Assessment studies reviewed are narrowly focused on intersection analysis, the outcome of which depends entirely on the, input values, namely the number of trips forecast. The reports reviewed did not consider the explicit value of safety, the wide range of road users, trip types, the operating environment or all parameters of the road network in question such as the steep grades, narrow shoulders, unforgiving roadside and hidden intersections. A comprehensive TIA approach would consider the interaction of all these factors and avoid ascribing crashes to driver error. The TIAs did not comment on operation of school buses in the same time slots as gravel trucks which may contribute to conflicts and crashes. With respect to the highway system, which has steep downgrades on reverse curves and narrow shoulders, the TIAs did not comment on road safety which is exacerbated in icy and snowy conditions. No mention was made of potential safety issues at hidden intersections, where a fatality occurred involving a gravel truck during the course of this study. Finally, the TIAs did not include a discussion of the impact of loaded gravel trucks which will slow to crawl speed on long steep grades resulting in platoons. Impatient drivers delayed on the upgrade and trapped in platoons may make risky overtaking maneuvers. In summary, a more holistic TIA approach to evaluating the impact of an increasing fleet of heavy trucks hauling aggregate on the highways of the Rocky View County would have provided a sounder basis for evaluating the Applications for the redesignation of land-use.

2.0 TERMS OF REFERENCE

- Michael B. Niven and Theresa Nolan, of Carscallen LLP, requested a report focusing on the traffic impact studies submitted with the land use Applications, Bylaw C-7583-2016, and PL20150077 - MSDP - Hughes Gravel Pit (Lafarge) - (hereinafter collectively referred to as “**Lafarge**”); Bylaw C-7588-2016, and PL20160054 - MSDP – BRADI Gravel Pit (McNair Sand & Gravel) - (hereinafter collectively referred to as “**McNair**”); Bylaw C-7585-2016, and PL20150100 - MSDP – Summit Gravel Pit (Mountain Ash Limited) - (hereinafter collectively referred to as “**Summit**”), (collectively the Applications), specifically:
 1. Review of Traffic Impact Assessment (TIAs);
 2. Accuracies of the TIAs;
 3. TIA Summaries in MSDPs;
 4. Cumulative Effect of all applications;
 5. The Planning Staff Report Submitted to Council; and
 6. Rocky View Council Decisions.

In addition, the purpose of this report is to:

1. Document Highway Characteristics and Routes Used by Haul Trucks;
2. Identify all road user on highways used by Aggregate Haul Trucks;
3. Identify potential Traffic Safety Issues as with the developments that are the subject of the application; and
4. Provide a framework for a Safe Systems Approach to aggregate transportation as input to the Master Site Development Plans.

BASIS OF THIS REPORT -- meetings were held on the following dates:

1. September 9, 2017- site visit of all routes by John Morrall & Thorne Forrest;
2. September 23, 2017- all haul routes were driven and a video-log made by John Morrall & Thorne Forrest; and
3. October 20, 2017 (meeting with Theresa Nolan, Michael Niven).

A number of reports were provided by Ken Blair and Theresa Nolan and these are listed in the reference section.

3.0 DEFINITIONS

-
- (A)MSDP – (Aggregate) Master Site Development Plan
- ARP – Aggregate Resource Plan
- Two-way Trips – describes the full cycle of aggregate removal from the pit in terms of trucks arriving empty then re-entering the road network fully loaded with aggregate. For example, half of the stated number would be trucks arriving at the pit empty while the other half of the number would represent the trucks leaving full.
- Hwy – Highway
- TIA – Traffic Impact Assessment.
- LOS – Level of Service.
- ISD – Intersection Sight Distance.
- AADT – Average Annual Daily Traffic.

4.0 REFERENCES

- *County Plan*, Rocky View County, 2017.
- *County Servicing Standards*, Rocky View County, 2013.
- *Community Aggregate Payment Levy*, Municipal District of Rocky View No. 44, 2006.
- *Aggregate Site Monitoring Bylaw (not sanctioned)*, Rocky View County, n.d.
- *Development Permit Application Process*, Rocky View County, n.d.
- *Aggregate Resource Plan (draft version)*, Rocky View County, n.d.
- *Municipal Government Act, Community Aggregate Payment Levy Regulation, Alberta Regulation 196/2005*, Province of Alberta, with amendments up to and including Alberta Regulation 196/2017.
- *Geometric Design Guide for Canadian Roads*, Transportation Association of Canada, 2017.
- *Manual of Uniform Traffic Control Devices for Canada*, Transportation Association of Canada, 2014.
- *Canadian Guide to In-service Safety Reviews*, Transportation Association of Canada, 2004.
- *The Canadian Road Safety Audit Guide*, Transportation Association of Canada, 2001.
- *Highway Geometric Design Guide*, Alberta Infrastructure, Updated 1999.
- *Roadside Design Guide*, Alberta Infrastructure and Transportation, 2007.
- *Traffic Impact Assessment Guide*, Alberta Infrastructure and Transportation, 2005.
- *Hillstone Aggregates Traffic Update*, Highway 567 Intersection Review- 2017 Update, Bunt & Associates, 2017.
- *Gravel Pit Access Strategy*, Watt Consulting Group, 2017.
- *Traffic Impact Assessment, Proposed Buckley Gravel Operation, Rocky View County*, Boots Engineering Ltd, 2013.
- *Summit Resource Development, Transportation Impact Assessment*, Watt Consulting Group, 2014.
- *Hughes Gravel Pit, Transportation Impact Assessment*, Watt Consulting Group, 2015.

5.0 MD OF ROCKY VIEW AGGREGATE BYLAW

A study of the processes used by the County to review and approve proposals to develop aggregate mining operations will be helpful in understanding the necessity of accurate TIA reports and whether Rocky View County had sufficient and accurate information before them in order to adequately assess the land use redesignation applications. The following section develops this study by:

- Examining the justification or reasoning underlying the various County aggregate bylaws and plans;
- Reviewing the Traffic Impact Assessments (TIA) submitted by the aggregate developers as part of their proposals;
- Critiquing the TIAs;
- Reviewing the summaries of the TIAs contained within the Aggregate Master Site Development Plans (MSDP); and,
- Critiquing the aggregate bylaw approval process.

5.1. Basis of Aggregate Bylaw

A number of County documents guide the development and operation of aggregate extraction activities. The set of documents include bylaws and plans that are both ratified by the County Council or in the process of becoming ratified. To minimize the scale of this section, only select pieces of information are highlighted as they relate to the transportation network and the aggregate extraction industry.

County Plan – The County Plan guides development and services within the county. Among other topics, it identifies aggregates as an important resource, the potential impacts of extraction and support for the extraction industry. In addition, the County Plan directs applicants for aggregate extraction to prepare an aggregate master site development plan and outlines the requirements. It is noted within section one of Appendix “C”, of the County Plan, beneath the header “Transportation”, items “t” through “x” are concerned with issues related to the existing transportation system including impacts on and efficiency of the existing transportation system, proximity to a paved road/provincial



Photo 1: Hwy 766 approaching Hwy 567, note the hidden intersection sign.

highway, safe access and egress and infrastructure for vulnerable road users. It is also noteworthy the County considers aggregate extraction a temporary land use because the land will be eventually be reclaimed and used for other purposes.

Rocky View County Land Use Bylaw – the Land Use Bylaw contains the regulations governing development within the County by:

- Establishing the processes for development permits, for rezoning and amendments to the bylaw;
- Regulating size and use of land and buildings;
- Classifying land use zones and determining the standards for developing each of these districts; and
- Determining the appropriate permitted and discretionary uses for each land use zone.

A development proposal for an aggregate mining operation, by way of an MSDP, would need to conform to this bylaw.

Master Site Development Plan (MSDP) – under the County Plan a MSDP must accompany an application for a land use redesignation. At present time, the Rocky View County is undertaking to produce a document entitled “Aggregate Resource Plan”, which is intended to



Photo 2: example of sag curves within the road network.

guide the development of aggregate mining operations within the County. However, until the document is ratified, the MSDP is being used as the interim means for developers to propose aggregate mining operations. The MSDP, as provided by the Applicants Lafarge, McNair and Summit, is a detailed document that sets guidelines for long term development of a site over a specified period of time. The MSDP contains information regarding business strategies, physical site characteristics, operational aspects, community consultation and might contain additional requirements at the discretion of council.

Development occurs primarily through the development permit process, required for new construction, and changes to how a building or land is being used. A complete list of requirements for an MSDP can be found within Appendix “C”, sections one and four of the Rocky View County Plan.

Among the Rocky View County Plan requirements for MSDP with direct bearing on the transportation system and traffic safety are found within section one, items “t” through “x” under

the heading “Transportation”, and again in section four item 13a, which calls for the inclusion of a Traffic Impact Assessment study in the MSDP.

Aggregate Resource Plan- not ratified (ARP) – alongside several County bylaws and standards, federal and provincial codes and regulations, and guided by the South Saskatchewan Regional Development Plan, ARP is an instrument intended to guide the development of the aggregate industry within Rocky View County once it has been ratified. The document was published in draft version sometime in the early months of 2016. A final draft is not available as of the writing of this report.

The goals of the document are related to the extraction of aggregate within the County and include: balancing the needs of industry, residents and society; and managing environmental impacts responsibly. The document seeks to establish criteria for assessing and monitoring cumulative effects of aggregate development including the effects of aggregate operations on non-aggregate uses and activities within the County such as highway traffic.

For example, a County strategy for managing traffic impacts is to attempt to locate aggregate extraction activities close to current and future provincial highways to delay the requirement to upgrade County roads to a time when development is more permanent in nature as opposed to the temporary development of the aggregate resource. In addition, locating the aggregate mining operation as close as practicable to the provincial highway network keeps the aggregate activity close to the aggregate market.

From a traffic perspective, the ARP will only support aggregate resource development where proposed access arrangements would be safe and appropriate as per County Servicing Standards, the impact of the traffic generated would not be detrimental to road safety to an unacceptable degree and the highway network is able to accommodate the traffic generated by the development.

County Servicing Standards – the Servicing Standards guide design, preparation, and submission of plans and specifications for construction of new roads, water distribution systems, low-pressure sanitary sewer systems, and stormwater management facilities in Rocky View County. The servicing Standards also contain specifications for completing Traffic Impact Assessments (TIA), a study required to be included within the MSDP.

Community Aggregate Payment Levy Bylaw – a levy imposed by the County on aggregate mining operations. The levy amount is equal to \$0.25 per tonne¹ of aggregate extracted and removed by means of trucking or shipping. The purpose of the levy is to offset impacts from

¹ As per the *Municipal Government Act, Community Aggregate Payment Levy Regulation, Alberta Regulation 196/2005*, Province of Alberta, with amendments up to and including Alberta Regulation 196/2017, the levy for aggregate will be increased to \$0.40 per tonne as of January 1st, 2018.

aggregate mining operations on County road infrastructure. Offsets include upgrades to roads infrastructure or greater maintenance requirements.

Note: County policy of locating aggregate mining operations as close as practicable to Provincial highways minimizes the length of County roads that would require maintenance or upgrade due to impacts from aggregate mining operations. Impacts to the Provincial road network would be the responsibility of the Province.

5.2. Review of Traffic Impact Assessment (TIA) Engineering Reports

TIA reports, which accompany an application for land use redesignation, are required both by the County's MSDP and by the Province as part of their requirements for developments requesting access to their respective road networks. The purpose of the report is to study impacts on a road network by the addition of new development. A TIA generally includes a description of scope and intensity of the proposed project, a summary of projected impacts, any required mitigation measures and helps ensure that the highway can safely accommodate a proposed development.

For information, Rocky View County contains roads which fall under the jurisdiction of the County and other roads which fall under the jurisdiction of the Province. Generally speaking, numbered highways fall under provincial jurisdiction, all other roads fall under County jurisdiction. It is County policy, as stated in the not yet ratified Aggregate Resource Plan, to locate aggregate mining development as close as practicable to the Provincial highway network to minimize use of County roads. Therefore, while TIAs are a requirement by the County as part of the MSDPs, the Province will also rely on these same TIAs to help minimize impacts to their highways, as a result of aggregate development, are mitigated.



Photo 3: hidden intersection followed by a reverse curve.

Three separate land use redesignation applications were made to Rocky View County for approval, these enclosed as required by the County Plan, an MSDP and supporting technical reports. These gravel pits are the Lafarge, Summit and McNair gravel pits. Each application contained a TIA engineering report and are summarized below:

McNair – dated October, 2013, the following summaries/recommendations (paraphrased) were made: a type III intersection² treatment is required for the intersection of the development access with Hwy 567; road improvements will be required due to growth in background traffic not estimated traffic growth from development; Impact to the road network should be reviewed as subsequent developments are apparent as results of which are likely to differ from those impacts presented in the (McNair) report. The McNair TIA report estimated 60 daily two-way trips generated as a result of the development. Background traffic was forecasted to grow at a rate of 2.22 percent.

Summit – dated August, 2014, the following summaries/recommendations (paraphrased) were made: a type IIIa intersection treatment is required but traffic volumes should be monitored to establish if and when further upgrades to the intersection will be required. The Summit report estimated 216 daily two-way trips generated as a result of the development. Background traffic was forecasted to grow at a rate of 4.00 percent.

Lafarge – dated March 2015 the following summaries/recommendations (paraphrased) were made: a type IVc intersection treatment is required for the intersection of the development access with Hwy 567; The intersection of Hwy 1a/Hwy 766 requires signalization and a 20 metre left turn bay; The intersection of Hwy 22/Hwy 567 should be monitored to establish when signalization is requires; both of the preceding intersection improvements will be due to growth in background traffic not traffic generated by the development. The Lafarge report did not provide estimated daily two-way trips generated as a result of the development- a peak-hour volume was used instead. Background traffic volumes were estimated using a growth rate of 2.5 percent.

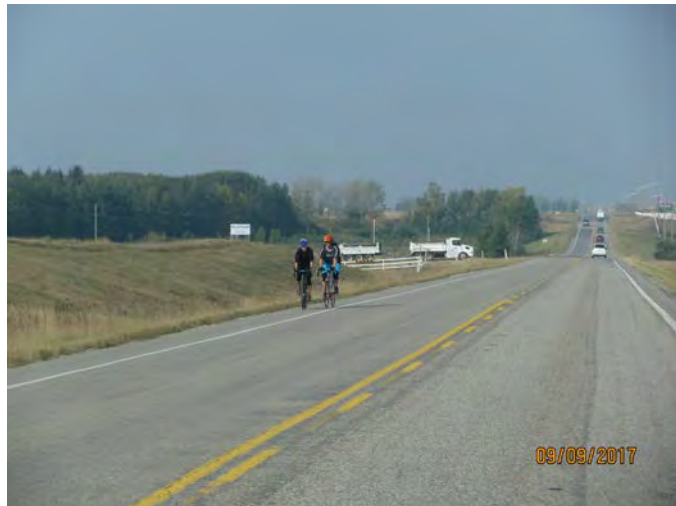


Photo 4: example of vulnerable road users and narrow road shoulders.

² Typical intersection treatment plans for two-lane undivided highways are specified within Alberta Infrastructure's Highway Geometric Design Guide. These treatments illustrate the normal design that is applied when such roads intersect- in this case a Provincial highway with a County access road/development access. The type of intersection treatment is selected primarily based on traffic volumes and turning movements, however, allowances can be made for intersections with special requirements such as a high number of heavy truck movements or intersections identified as accident prone, for example. There are five categories of intersection treatments each represented by a Roman numeral between I and V, inclusive. In addition, there are variations within each category, depending on application, and these are indicated by small-case alphabetic letters "a" through "d". Generally speaking, the higher the Roman numeral, the more complex the intersection layout. See Appendix 5 for more details.

Table 1- Summary of Estimated Daily Two-way Trips and Suggested Growth Rates Derived from Gravel Pit Development Applicant TIAs

Gravel Pit	Estimated Daily Two-way Trips	Background Traffic Growth Rate (%)	Consultant
Lafarge ³	18	2.50	Watt Consulting
Summit ⁴	216	4.00	Watt Consulting
McNair	60	2.22	Boots Engineering
Hillstone Aggregates ⁵	234	-	Bunt & Associates

5.3. Critique of TIA's

McNair – the estimation of 60 daily two-way trips generated seems low. An economic analysis, contained in Appendix 2, suggests the breakeven point for pit operation is order-of-magnitude 120 daily two-way trips. For context, Hillstone Aggregate's pit, located on the south side of Hwy 567, generates 234 actual two-way daily trips, as per a March 01, 2017 letter from Bunt Associates to Kelham and Associates regarding warrant for intersection treatment. Understating the number of trips generated by these developments could lead to erroneous and potentially damaging analytical results, such as an understating of the volume and the proportion of trucks in the traffic volume on opening day.

Summit – perhaps the more realistic report of the three with regard to estimated daily two-way trips. It is interesting to note the discrepancy in growth rates, comparing the Lafarge and Summit TIAs, considering the pits are located in virtually the same location and the TIAs were

³ For the purposes of comparing the three TIAs, a circuitous calculation was used to determine a daily trips number for the Lafarge Pit using various sources. In a subsequent August 14, 2017, letter to Boots Engineering Ltd justifying the use of a type IV intersection treatment, Watt Consulting explains the combined daily two-way trips from the Hillstone, McNair and Lafarge pits combined will be no greater than 312. The estimated daily two way trips generated by the McNair pit is 60 as per their TIA report. The Hillstone pit generates an actual 234 daily two-way trips, as per a March 01, 2017 letter from Bunt Associates to Kelham and Associates regarding warrant for intersection treatment. Summing the numbers from Hillstone and McNair, and subtracting from the total number provided by Watt consulting gives: $312 - (60 + 234) = 18$ daily two-way trips.

⁴ Watt Consulting estimated 216 daily 2- way trips, within their August 18, 2014, TIA, being generated by the Summit Pit (4,320 tonnes/40 tonnes per trip), however, in an August 14, 2017 letter from the same consultant to Boots Engineering, the number of estimated two-way trips was stated to be 150. The more conservative number is used in the table.

⁵ This number was requested from an operating pit in the area and is provided for context. The number is not derived from a TIA but from a March 01, 2017 letter from Bunt & Associates to Kelham & Associates Inc. regarding Hillstone Aggregates Traffic Update, Hwy 567 Intersection Review – 2017 Update. See Appendix 6 for details.

produced only five months apart and by the same consultant. This, the second TIA report for pits in the area, did not consider impacts on the existing road network due to the McNair development, only impacts from the Summit pit.

Lafarge – the method for establishing the number of 18 daily two-way trips, as explained in footnote 2, is circuitous in nature but demonstrates poor correlation between one, or more, of the three TIAs. As per the economic analysis contained in Appendix 2, it is difficult to imagine a gravel pit being successful with a mere 18 truckloads of gravel leaving the site each day. Again, the low number points to an understating of the volume of gravel that could be leaving this mining site and to a potentially poor correlation between the two other sites, Summit and McNair. Understating the number of trips generated by these developments could lead to erroneous and potentially damaging analytical results such as an incorrect percentage of trucks in the traffic stream and lower than actual traffic volume numbers.

The Lafarge TIA did review the overall transportation network. This approach is positive, however, the resulting analysis understates the cumulative impact because it uses truck traffic generated by the Lafarge Gravel Pit only and leaves out traffic impacts due to the other two proposed pits. The report highlights intersections, namely the Hwy 1A/Hwy766 intersection, where the LOS⁶ of specific traffic movements does not meet minimum standards at 20 year operating conditions. The same analysis but with all pit generated traffic might show more turning movements breaking down and/or breaking down sooner than the 20 year horizon. Had the expected traffic generation by all three pits been considered in the TIA analysis, a more comprehensive appraisal of the cumulative impacts to the global road network would have been realized.



Photo 5: hidden intersection following horizontal curve on Hwy 567.

5.4. TIA Reports Contained Within the MSDP Submissions

Three MSDPs were submitted to the Rocky View County and, as of September, 2017, all three have been approved including land use redesignations. It was noted all three MSDP documents are contained on the Rocky View County website, however, the TIA reports were not included. A Joint Transportation Strategy (JTS) was contained within all three MSDPs. The

⁶ A level-of-service (LOS) is a letter designation that describes a range of operating conditions on a particular type of facility. Six levels of service are defined using letters “A” through “F” where “A” represents best level of service and “F” presents worst operating conditions.

JTS was produced by the Big Hill Springs Aggregate Producers Group, which includes the three Applicants- McNair, Lafarge and Summit. The purpose of the JTS was to:

- Acknowledge the cumulative impacts on the volume of heavy trucks entering the traffic stream of Hwy 567.
- Include estimated number of trucks entering the traffic stream not only from the three proposed gravel pits but also from the existing pit- Hillstone Aggregates.
- Discuss the upgrade of existing intersection Hwy 567/Rge Rd 40 from a type III to a Type IVa.
- Discuss the proposed installation of a second type IVc intersection to be located 800 metres west of Range Road 40, as per Watt Consulting Group letter to Boots Engineering Ltd on August 14th, 2017. The intersection will serve as access to Hwy 567 for the McNair, Lafarge and Hillstone pits.
- Commit to the construction of an auxiliary lane connecting the two intersections.
- Estimate an average of 93 loaded trucks from the Lafarge and McNair⁷ pits, and another 50 loaded trucks from the Summit pit for a total 143 loaded trucks leaving the three recently approved gravel pits daily. Double this number to obtain a total of 286 cumulative average daily two-way trips.
- State the average number of daily two-way trips generated by the existing Hillstone pit at 120.
- State a 6.1% increase to traffic volume on Hwy 567 resulting from the expected increased truck activity from the pits belonging to the Big Hill Springs Aggregate Group only.

In addition to the JTS, other information regarding transportation was noted within the body of the individual MSDPs. Each report described, in as many words, the commitment of each applicant to assist Rocky View County and Alberta Transportation to undertake or contribute to road network upgrades as a condition to future development permits.

⁷ McNair Increased its annual gravel production from the 100,000 tonnes indicated in its 2013 TIA to a maximum of 300,000 tonnes as per their AMSDP. 300,000 tonnes of aggregate per year delivered 180 day per year at a rate of 33 tonnes per truck yields 50.5 gravel deliveries. Double this to account for return trip yields 101 two-way trips, which is still below the breakeven threshold suggested by the economic analysis contained within Appendix 3.

5.5. Critique of the Aggregate Bylaw Approval Process



Photo 6: type IVc intersection treatment, Hwy 567.

The JTS contained within the approved MSDPs goes a distance towards addressing impacts on the road network in a cumulative manner. However, they still don't sufficiently address all cumulative traffic safety issues that would likely be generated by the multiple proposed gravel pit developments in the area. They fall short in at least three areas:

- The estimated number of trips generated by the approved developments appears to be understated;
- The expected number of loaded trucks leaving the pits is expressed as an average; and
- The significant impacts of traffic, generated by the proposed gravel pits, on the segments of the road network outside of the proposed intersections of Hwy 567 and the development accesses are not considered.

The following is a brief discussion on these three issues:

Estimated Number of Trips – generated by the approved developments seems low compared to the economic analysis provided in Appendix 3. Accordingly, a pit would require an order-of-magnitude 120 two-way trips per day to break even. The cumulative number of estimated daily two-way trips stated for the Lafarge, McNair and Summit pits is 286, which is lower than the breakeven point. The Hillstone pit was assigned a breakeven number of 120 but, as per the *Hillstone Aggregates Traffic Update, Highway 567 Intersection Review- 2017 Update*, Bunt & Associates, 2017, the actual number of daily two-way trips from Hillstone is 234 trips per day. This analysis suggests the estimated trips are understated and, by extension, so too is the volume on the road network and the proportion of trucks in traffic as a percentage.

Expected Number of Loaded Trucks Expressed as an Average – the JTS gives daily two-way trip numbers as an average. This seems troublesome because if you average trips from a nearby operating pit, you will arrive at 108, an inherently misleading number given the maximum daily two-way load count occurs in the month of November and is equal to 237 (see Table 2) a factor of 2.2. Using a number that is an average is misleading because it ignores peak traffic periods, as demonstrated above, and, by extension, understates the actual impacts on the road network from the proposed gravel pit developments.

Table 2- From Bunt Hillstone Aggregates Traffic Update, Highway 567 Intersection Review- 2017 Update, Bunt & Associates, 2017

Month	Loads	Workdays	Loads per Day	Adjusted Loads per Day
January	342	25	13.68	16.42
February	247	25	9.88	11.86
March	202	25	8.08	9.70
April	507	25	20.28	24.34
May	682	29	23.52	28.22
June	1379	29	47.55	57.06
July	1277	29	44.03	52.84
August	2088	29	72.00	86.40
September	2305	29	79.48	95.38
October	2816	29	97.10	116.52
November	2463	25	98.52	118.22
December	654	25	26.16	31.39

Based on the adjusted loads per day shown above, the 90th percentile daily loads is 117 per day, which translates to 117 trips in and 117 trips out to be added to the 2017 AADT & ASDT volumes.

Impacts on Broader Road Network Not Considered – it is interesting to note the same analysis on impacts to the road network used by the TIA attached to Lafarge's original MSDP submission, which identifies potential LOS issues on certain turning movements on the Hwy 22/Hwy 567, Hwy 567/Hwy 766 and the Hwy 1A/Hwy 766 intersections, is used now with the updated and coordinated applications by Lafarge, McNair and Summit. The concern identified within section 5.3 of this report still remains: the analysis is based on the traffic generated by the proposed Lafarge pit alone. It ignores the other two pits, Summit and McNair.

In addition, other impacts on the road network that contains the haul routes for the proposed gravel pit developments, such as the requirement for truck climbing lanes, are addressed by the Big Hill Springs Aggregate Group's commitment to contribute in some way to the Province's efforts to identify essential upgrades to the network and determine when these upgrades are required. This commitment, however, is deferred to sometime in the future when the three developers might make subsequent development applications to the County. Deferring to the future, however, does not serve Rocky View County because there are safety concerns on the road network that should be addressed now, before the proposed pits come into operation, and not at some indeterminate time in the future.

6.0 ROAD USERS ON HIGHWAYS USED BY AGGREGATE HAUL TRUCKS

Transportation Impact Assessment (TIAs) should consider all road users as part of the analysis process. For example, it is noted that an in-service road safety review must consider all road users.

The following are road users on the highways of interest that are also used by aggregate haulers:

- **Familiar Drivers** – these are local residents that use the highways for commuting, shopping, recreational and educational purposes. Typically, this group drive cars, SUVs, vans and pick-up trucks. As they are regular users, they know the highways and driving conditions, but some may be overconfident and overdrive (speed, take risks) the highway on occasion.
- **Unfamiliar Drivers** – these are drivers not from the region, visiting friends and relatives in the County. This group also includes tourists and truck drivers making a delivery for the first time. This group, for the most part, drive cars, SUVs, vans, pick-up trucks and RVs. While unfamiliar drivers tend to be cautious, they also may slow and brake suddenly to make a turn or not exercise enough caution when their expectations are violated at a concealed intersection or advisory speed on a reverse curve.
- **Gravel Haul Operators** – this group operates the range of vehicles shown in Appendix 4. The most common mode is the tandem with a tridem pup. While this is a group of professional drivers who are familiar with the highway, their MO is based on cost-efficient deliveries which means making deliveries on time. With respect to safety and operations, no information on driver training and vehicle inspections was available for preparation of this report.
- **Commercial Heavy Truck Operators** – this group operates a range of trucks from Single Unit Trucks (SU) to B-Trains (WB-25), which are 25 m in length and have a GVW of 63.5 t. These are also professional drivers who may or may not be familiar with the highways in the County.
- **School Bus Drivers** – this is a group of professional drivers who follow specific routes in the am and pm peak traffic periods on school days. Appendix 2 contains a drawing entitled Gravel Pit Locations and Haul Routes that describes trip distribution for school buses in the area. School bus operations are characterized by frequent stops on the highways. It is noted that school bus operations, 40 buses per am peak traffic period and another 40 buses during the pm peak period, occur at the same time as gravel haul operations and commuter trips.



Photo 7: approaching large sag curve, Hwy 567.

- **Motorcyclists** – this group includes a range of operating skills and machines. At the low end there are scooters as shown in the photos in Appendix 3 and to the right. In general, this is a risk-taking group of drivers as demonstrated by the high number of crashes per veh-km travelled.
- **Cyclists** – the cyclists on rural highways tend to be experienced and respectful of vehicular traffic except when they cycle in groups, side by side. Cyclists were observed on all highways during the site visits. It is noted that the cross section of the highways is inadequate for safe cycling. Cyclists require a minimum paved shoulder of 1.5 m, which is 1 m more than that afforded. In terms of operations drivers should pass cyclists at an offset of 1.5 m, which means drivers must use the opposing lane to safely pass a cyclist. The highway cross sections do not allow safe cycling or the safety required for passing maneuvers.
- **Farm Machinery** – farm machinery is operated on the highways as farmers must move equipment from field to field. Typically farm machinery is over-dimensional and moves at speeds less than 50 km/h, which can pose safety and operational problems on the highways.
- **Overload Vehicles** – an existing high-load corridor utilizes Hwy 566, Hwy 772, Hwy 567 and Hwy 22 between Hwy 2 and Hwy 22. Between 418 and 879 overload permits are issued for Hwy 567 alone. Similar to farm equipment, overloads often require more pavement width than conventional vehicles and because of narrow shoulders are often encroaching into the oncoming traffic lanes. Operational issues are compounded in the presence of vulnerable road users such as cyclists.



Photo 8: underpowered motorcycle using narrow shoulder for refuge.

Cyclists require a minimum paved shoulder of 1.5 m, which is 1 m more than that afforded. In terms of operations drivers should pass cyclists at an offset of 1.5 m, which means drivers must use the opposing lane to safely pass a cyclist. The highway cross sections do not allow safe cycling or the safety required for passing maneuvers.



Photo 9: example of overload vehicle crossing a narrow structure on Hwy 22.

7.0 HIGHWAY CHARACTERISTICS AND ROUTES USED BY HAUL TRUCKS

The main highways in the study area used by haul trucks to/from gravel pits are as follows: Hwy 1A; Hwy 22; Hwy 566; Hwy 567; Hwy 766; and Hwy 772.

The gravel haul network is shown on a drawing entitled Gravel Pit Locations and Haul Routes in Appendix 2.

7.1. Geometrics and Laning

The highway and network for the most part is two-lane, two-way with the exception of Hwy 1A east of Glen Eagles.

The design designations for the highways of interest are: RCU-208-110; RLU- 208-110; and RLU-208-100.

Where:

RCU = Rural Collector Undivided
RLU = Rural Local Undivided
208 = two-lanes with a pavement width of 8 m
110/100 = design speed (km/h)
Lane width = 3.5 m
Shoulder width = 0.5 m
Desirable maximum gradient = 6%
Sideslope ratio: normal = 4:1
On fills = 3.1 (over 4 m)

Note: these are Alberta Infrastructure Design Standards for Rural Highways circa 1995, Highway Geometric Design Guide. While many of these highways pre-date 1995, earlier design guidelines would apply. For example, Plans & Profiles for SR No. 567:02 are dated Jan – April 1975 in which case the design designation would have been RCU-60-228 or RCU-60-226 where:

Design Speed = 60 mph
Lane Width = 12'
Shoulder Width = 2' or 1'
Sideslope = 3:1
Gradient Design Maximum = 7%



Photo 10: approaching intersection with poor intersection sight distance.

Source: Alberta Highways and Transport Construction Branch Design Manual 1973.

Horizontal Geometry – the gravel haul routes for the most part are tangent as shown in Appendix 2. However, the Hunt Coulee section on Hwy 567 and Hwy 772/Hwy 566 were checked with a ball-bank indicator to determine if the posted advisory speed met the Safe Curve Speed Criteria. Photos in Appendix 3 show the ball-bank indicator further information on establishing safe speeds on curves can be found in Appendix 7.

Hwy 567 -- the main east-west haul route linking aggregate pits with other highways. It is a level tangent highway with narrow shoulders except for Hunt Coulee and the long sag curve at Big Hill Springs Provincial Park.

Hunt Coulee Curve Speed Study:

**Where: Posted Speed = 100 km/h
Advisory Speed = 70 km/h
Tested at = 70 km/h**

CURVE	Deflection
C1	2°
C2	8°
C3	2°

The advisory posted speed of 70 km/h is within the limit of 10⁰. Haul trucks should not exceed 70 km/h as there is no margin of safety on curve 2.

Hwy 566 -- Hwy 566 east of the intersection with Hwy 772 has a reverse curve followed by a sharp curve with a regulatory posted speed of 60 km/h and advisory speed of 45 km/h. The curves were ball-banked at a speed of 45 km/h. Readings were 10⁰ and 20⁰ EB and 7⁰ and 14⁰ WB respectively.

The implication of the findings is that haul trucks must adhere to the advisory posted speed of 45 km/h as the ball-bank tests showed the safe curve speed on the reverse and sharp curve was exceeded. It is noted that the haul trucks are more prone to roll-overs than the test vehicle due to their high centre of gravity, which underscores the fact that haul truck drivers must exercise caution when driving through these curves.

Hwy 772 SB to Hwy 566 EB -- The posted regulatory speed when making this turn is 80 km/h. Ball-bank reading varied from 14⁰/15⁰ to 20⁰. In addition, to the advisory speed being exceeded it is noted that sight distance to check for NB vehicles, at the intersection, is limited due to the vertical crest curve. In summary, the intersection and reverse curves are a potential safety issue for EB haul trucks that are not being operated with due care and attention at a speed lower than the advisory speed.

7.2. Profile

The following highways have grades steep enough to cause a heavy truck at highway operating speeds entering the grade to drop more than 15 km/h, which is one of the key determinants for a climbing lane:

Hwy 22 north of Hwy 1A
Hwy 1A east of Cochrane
Hwy 567 at Hunt Coulee
Hwy 772 south of Hwy 567
Hwy 766 south of Hwy 567

In order to check the gradeability of these highways a profile is required. However, only the profile of Hwy 567 from Hwy 766 to Hwy 772 was available for the preparation of this report.

Appendix 4 shows the range of aggregate truck modes of transport. The most common mode of aggregate transport is the tandem truck and tridem pup⁸.

For purposes of analysis a design truck of 120 g/w (200[#]/hp) was selected. It is noted the design truck of 180 g/w is normally used for two-lane highways in Alberta to determine the need for a climbing lane.



Photo 11: example of a tandem truck with tridem pup.

Appendix 4 shows the critical length of grade for the design truck. For example, the design truck would have a speed reduction of 15 km/h within 160 m on an 8% grade.

The controlling grade at Hwy 567 is 8% (grades vary from 4.6% to 8%). The overall length of this grade is 1,500 ft (457 m). The performance curves, shown in Appendix 4, indicate that the design truck would have a speed of 38 km/h at the crest of the curve.

Haul truck speeds were recorded for loaded and unloaded tandem trucks with a tri axle pup on the Big Hill Springs Hill and Hunt Coulee. Appendix 4 shows the GVW, Tare, direction (EB or WB), date and time as well as the speeds recorded. It is noted that speeds of loaded trucks

⁸ The tandem truck with tridem pup has the following performance characteristics: GVW_{kg} : 43,500 to 45,300 (95,901 - 99,869 lbs); hp : 475 to 550 (354 – 410 kw); Mass/Power Range:106-128 g/w (174-210 # /hp).

drop to 28 km/h to 33 km/h at the crest of the grade on the S bend (Hunt Coulee). Speed reductions were not as severe on the Big Hill Springs grade.

A haul truck NB on Hwy 772 was followed from the bridge to the crest at TWP Rd 264 and the speed was observed to drop to 30 km/h. On the second hill NB on Hwy 772 the speed was observed to drop to 40 km/h. Speed for unloaded trucks were not as severe and were recorded between 65 km/h and 72 km/h on both grades. In summary, the recoded speeds of loaded trucks EB on the 8% grades confirmed the speeds estimated by the performance curves for a design truck of a mass/power of 120g/w. The slightly lower speeds of between 6 to 10 km/h indicate the observed trucks had a mass/power ratio greater than 120g/w resulting in poorer gradability performance.

7.3. Cross Section

The narrow shoulders of 0.5 m is inadequate for bicycles or disabled vehicle storage (cars are 2.1 m and trucks 2.6 m) as shown in the Photos in Appendix 3. The sideslopes of 3:1 are critical and non-recoverable for errant vehicles. The site visit indicated some sideslopes steeper than 3:1 which would likely result in a roll-over for an errant vehicle.

7.4. Intersections

With the exception of signalized intersections on Hwy 22 in Cochrane, all major intersections are either two or four-way Stop controlled as shown in the Photos in Appendix 3.

In addition, there are several intersections with minor roads having limited sight distance as shown in Appendix 3.

7.5. Passing Zones

Although the highway network is for the most part tangent, the intersections and vertical crest curves limit passing zones to approximately only 30% of the highway. Passing opportunities on the gravel haul network are severely restricted by the limited number of passing zones.

7.6. Auxiliary Lanes

Auxiliary lanes are additional lanes to facilitate turning, deceleration, acceleration, passing and climbing-lanes on grades. With the exception of the intersection of Hwy 567 and Hwy 766 and intersections on Hwy 22, intersections on the network do not have acceleration or decelerations lanes.



Photo 12: platooning vehicles behind a tandem truck with a quad wagon.

While Hwy 22 and Hwy 1A have climbing lanes out of the valley from Cochrane, the main gravel haul routes such as Hwys 567, 566, 772 and 766 have neither passing nor climbing lanes. The combination of lack of passing zones, no passing/climbing lanes and heavily loaded trucks on steep grades results in operational delays and the formation of queues on the long grades.

7.7. Crossroad and Driveway Density

Operational delays also occur at highway intersections with Range Roads, Township Roads and private driveways as these intersections do not have left-turn lanes or acceleration/deceleration lanes. Lack of auxiliary lanes results in operational delays as through traffic must slow or stop for a driver to make a left-turn for example. Vehicles turning right from the highway or turning onto the highway from a cross road will cause through traffic to slow. In some cases, these movements can cause rear-end collisions or left-turn across path collisions due to contributing factors such as following too close or misjudging gaps.

7.8. Wildlife Crossings

There are wildlife crossing signs warning drivers to expect animals suddenly crossing the highway. The wildlife crossing problem is exacerbated by the Big Hill Springs Provincial Park, which provides a refuge for wildlife.

8.0 POTENTIAL TRAFFIC SAFETY ISSUES

The following section develops a list of safety issues observed during site visits, which were not addressed within the TIAs contained within the three Applications for land use redesignation.

8.1. Traffic Operations

School Bus & Haul Truck Operations

School bus and gravel haul operations occur in the am and early pm peak traffic periods. There are 80 school bus trips daily, 40 during the am peak traffic period and 40 during the pm peak traffic period Appendix 2 contains a drawing entitled Gravel Pit Locations and Haul Routes that describes trip distribution for school buses in the area. In addition to operating in the same time periods, school buses make periodic stops on the highway, while gravel haul trucks must operate in a cost-effective mode to ensure on-time deliveries. The safety issue is frequent stops could result in rear-end collisions with school buses due to the longer braking distance of haul trucks.

Safety measures would include restricting gravel haul operations to periods outside of school bus operations. With vehicle-to-vehicle (V2V) capability school bus and gravel haul operations could co-exist in the same time periods, however, this assumes all vehicles would have V2V capability which is unlikely in the next decade.

Operations on Grades

Loaded haul trucks on the long steep grade on Hwy 567 east bound, Hwy 766 south bound and Hwy 772 south bound will slow to approximately 30 km/h at the vertical crests. As the haul trucks slow on the upgrades, platoons will form behind the trucks. The safety issue is that a speed differential of 15 km/h or more can result in rear-end crashes. As well, slow moving queues can result in risky and illegal passing maneuvers by drivers trapped in platoons over long distances.

Measures could have included, if considered, the construction of climbing lanes. While the 15 km/h speed reduction is reached on the long steep grades, it is one climbing lane warrant criteria. The other criterion includes the number of trucks, percent heavy vehicles, tractor trailers, single unit trucks and recreational vehicles. On Hwy 567, the heavy vehicle warrant of 150 veh/day is easily met. In addition, the volume warrant of 1,500 AADT for truck climbing lanes on two-lane highways with a 30% passing opportunity is easily met for Hwy 567.

In summary, the Alberta Transportation climbing lane warrant for Hwy 567 at Hunt Coulee and Big Hill Springs east bound upgrades is easily satisfied on the basis of speed reduction, heavy truck volume/day, and AADT volume warrant based on % grade, length of grade and % heavy vehicles for 30% passing opportunity.

Hidden Intersections

There are several hidden intersections on the highway network as shown in the photos in Appendix 3. The most problematic is the Hwy 567/Bearspaw Road intersection. There is a horizontal curve just east of the intersection, which conceals the intersection for WB drivers. While the intersection is correctly signed with the Concealed Intersection Sign, WB drivers do not have sufficient stopping sight distance if there is a vehicle stopped to make a WB-SB turn at the intersection. It appears the westbound ISD at this intersection is less than 300 metres⁹. In fact, lack of adequate ISD at this location could have been a contributing factor to the fatal crash on September 18, 2017, involving a gravel truck and light pickup truck.

In summary, the safety issue is a concealed intersection with insufficient stopping sight distance for heavy trucks. With the additional trucks expected with the proposed gravel pits, the safety issue will be exacerbated. In such cases a flashing beacon can warn drivers of a concealed intersection, such as the intersection of Hwy 567 and Lochend Road.

⁹ It is noted that the stopping sight distance for trucks with conventional braking is 235 – 330 metres for a design speed of 100 km/h.

8.2. Vulnerable Road Users (VRU)

Cyclists contribute to the main VRU group on the highway network. It has been noted in Section 5, that the highway cross sections are inadequate for safe cycling.

While rebuilding the highway network with wider shoulders and wider lanes to safely accommodate cyclists is one option, it would involve a major 4R project to achieve 3.7 m lanes and a minimum of 1.5 metre shoulders. A more cost-effective and far safer option is a multi-use trail system. It is suggested that a separate 3 m pathway within the highway right-of-way would provide the safest and most cost-effective option. Alberta Transportation guidelines for Trails in Alberta Highway Right-of-Way, Policies, Guidelines; and Standards (2015) provide the basic design guidelines for multi-use trails.



Photo 13: example of vulnerable road user and narrow road shoulders.

9.0 CONCLUSIONS

9.1. Rocky View Aggregate Bylaw

The TIA reports look only at the impact of a single gravel pit development on the road network and fail to cumulatively include other nearby developments or future planned developments.

The TIA reports focusses narrowly on discreet intersections and often fails to look at the overall road network safety issues, in this case the road network that includes the complete haul routes for the gravel pits.

The effectiveness of the TIA depends on the accuracy or the completeness of the data used to build the model. In the case of the three TIAs reviewed, potentially understated expected daily two-way trips of heavy trucks generated by the proposed development will minimize the magnitude of needed improvements to the road network.

Planning for aggregate pits should assume a realistic maximum production even though owners may initially work at a reduced rate of production.

Numbers provided by the developer, which form the basis of TIAs, should be closely vetted against other applicants and/or nearby operating gravel pits, if available, to ensure accuracy. Alternatively, the highway agencies, Rocky View County and Alberta Transportation, themselves could provide these numbers to the developers.

The Joint Transportation Strategy (JTS) improved slightly over original TIAs in estimating daily two-way truck trips generated by the gravel pit developments, however, based on comparison with operating pits and to an economic analysis the number of trips estimated still seems low.

The JTS states estimated daily two-way heavy truck trips generated by the gravel pit developments as an average, which understates the number of heavy trucks in the traffic stream during peak periods.

Cumulative impacts on the greater network are mentioned within the JTS, such as intersection improvements on the greater network and to the requirement for climbing lanes, however, analysis of these issues are all deferred to future subsequent development permit applications.

There is no mention of other critical road network issues that exist today for example concealed intersections, steep grades, inadequate intersection site distances, narrow shoulders, other road users, school bus operations, solutions for platooning, etc.

In summary, the TIA reports and MSDPs, submitted by the Applicants and relied upon by Rocky View County, did not have sufficient information- accuracy of the estimated truck volume numbers used to form the basis of the TIA reports and the cumulative impacts of the proposed developments on the road network- to approve the land use redesignations.

9.2. TIAs and Road Safety

This study has concluded that the Traffic Impact Assessment studies reviewed are narrowly focused on intersection analysis, the outcome of which depends entirely on the, input values, namely the number of trips forecast. The reports reviewed did not consider the explicit value of safety, the wide range of road users, trip types, the operating environment or all parameters of the road network in question such as the steep grades, narrow shoulders, unforgiving roadside and hidden intersections. A comprehensive TIA approach would consider the interaction of all these factors and avoid ascribing crashes to driver error. The TIAs did not comment on operation of school buses in the same time slots as gravel trucks which may contribute to conflicts and crashes. With respect to the highway system, which has steep downgrades on reverse curves and narrow shoulders, the TIAs did not comment on road safety which is exacerbated in icy and snowy conditions. No mention was made of potential safety issues at hidden intersections, where a fatality occurred involving a gravel truck during the course of this study. Finally, the TIAs did not include a discussion of the impact of loaded gravel trucks which will slow to crawl speed on long steep grades resulting in platoons. Impatient drivers delayed on the upgrade and trapped in platoons may make risky overtaking maneuvers. In summary, a more holistic TIA approach to evaluating the impact of an increasing fleet of heavy trucks hauling aggregate on the highways of the Rocky View County would have provided a sounder basis for evaluating the Applications for the re-designation of land-use.

Respectively submitted,



2017, Dec 08
John F. Morrall, P. Eng.
President
Canadian Highways Institute Ltd.

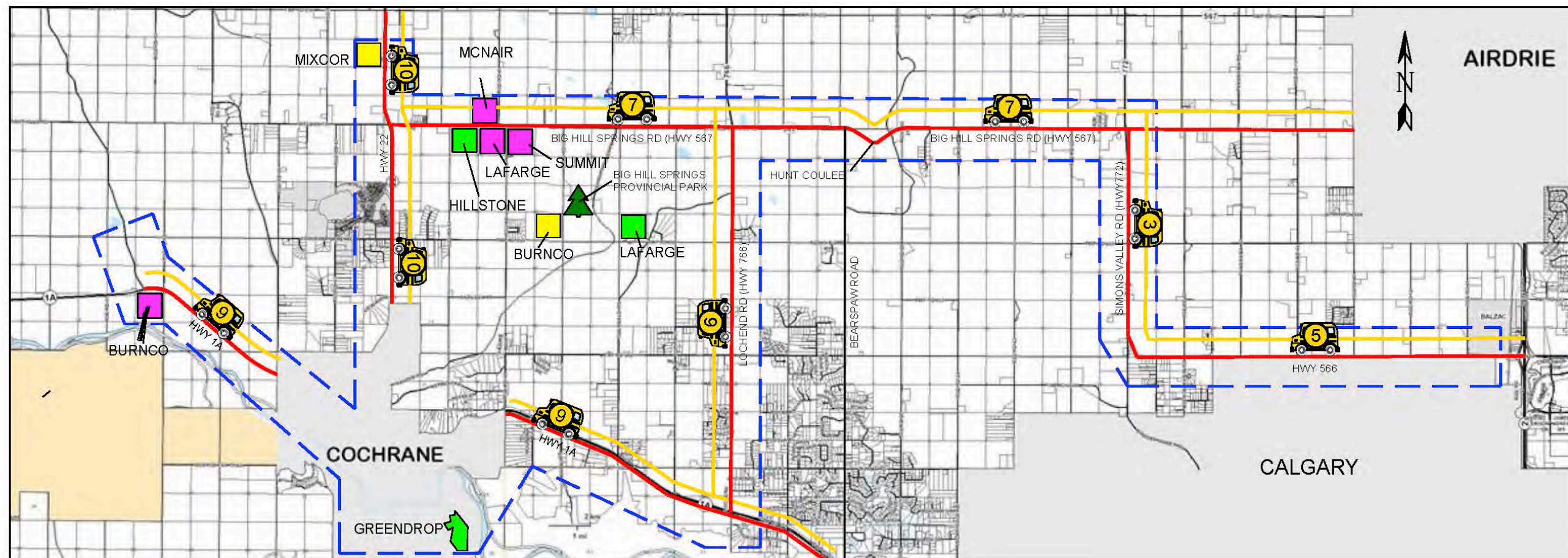


2017, Dec 08

Thorne P. Forrest, P. Eng.
Director
Forrest Engineering

APPENDIX 1

DRAWINGS AND MAPS



- LEDGEND**
- STUDY BOUNDARY
 - GRAVEL PITS - ACTIVE
 - GRAVEL PITS - APPROVED
 - GRAVEL PITS - PENDING
 - GRAVEL PITS - PLANNED
 - NO. SCHOOL BUSES/DAY/HWY
 - GRAVEL PIT HAUL ROUTES

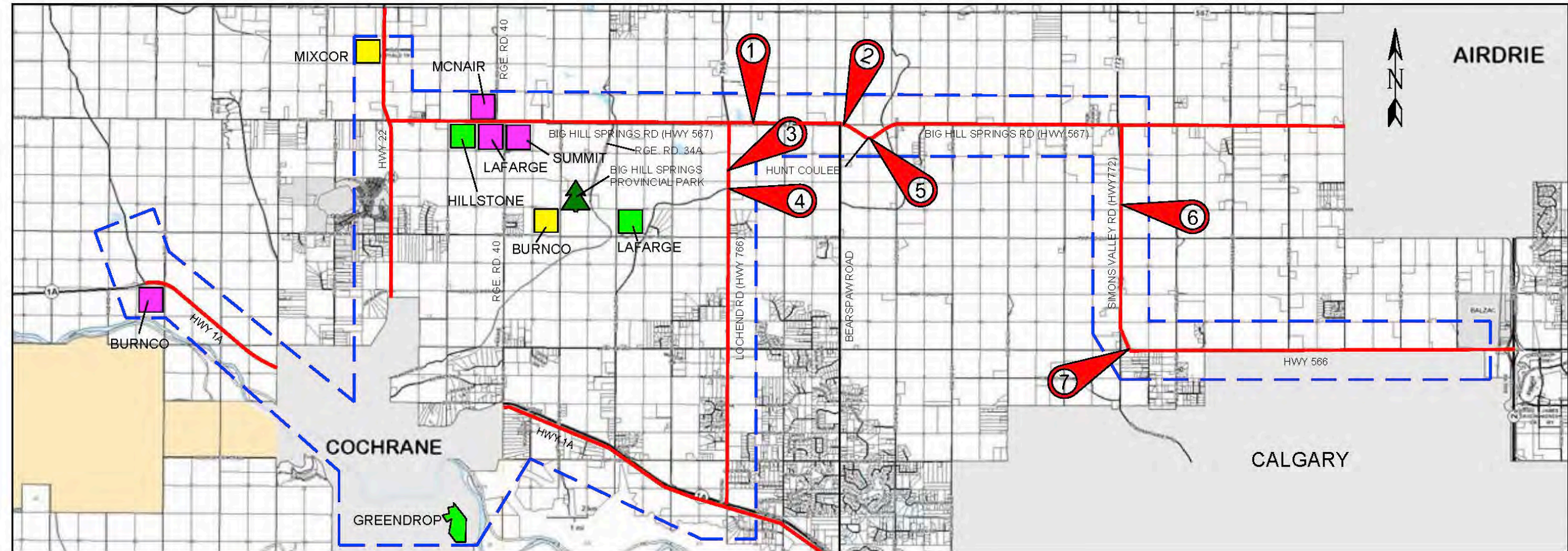
Revisions			
Date	Rev. No.	Description	By

**REVIEW OF TRAFFIC IMPACT ASSESSMENT REPORTS
SUBMITTED IN CONJUNCTION WITH
LAND USE REDESIGNATION APPLICATIONS, and MASTER SITE DEVELOPMENT
PLANS OF LAFARGE, MCNAIR and SUMMIT:**

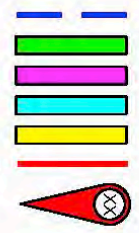
GRAVEL PIT LOCATIONS AND HAUL ROUTES

Date: 17/11/17 Designed: TPF Checked: Scale: NTS Drawing No.:





LEDGEND
 STUDY BOUNDARY
 GRAVEL PITS - ACTIVE
 GRAVEL PITS - APPROVED
 GRAVEL PITS - PENDING
 GRAVEL PITS - PLANNED
 GRAVEL PIT HAUL ROUTES
 FLAGS



FLAGS- SAFETY- OPERATIONAL ISSUES
 1. SAG CURVE
 2. HIDDEN INTERSECTION- FATALITY
 3. SAG CURVE
 4. HIDDEN INTERSECTION
 5. SAG CURVE
 6. SAG CURVE
 7. LEFT TURN, WITH POOR SIGHT DISTANCE, LEADING INTO REVERSE CURVE , CURVE LEFT AND 45 KM/H ADVISORY SPEED

Revisions			
Date	Rev. No.	Description	By

**REVIEW OF TRAFFIC IMPACT ASSESSMENT REPORTS
 SUBMITTED IN CONJUNCTION WITH
 LAND USE REDESIGNATION APPLICATIONS, and MASTER SITE DEVELOPMENT
 PLANS OF LAFARGE, MCNAIR and SUMMIT:**

SAFETY/OPERATIONAL ISSUES

Date: 17/11/17 Designed: TPF Checked: Scale: NTS Drawing No.:



APPENDIX 2

ECONOMIC ANALYSIS

Gravel Pit Daily Revenues versus Daily Costs

Daily Costs

	per tonne	Per Hour	11 hour day	
Royalty to Rockyview County	0.40		415.8	Effective 2018 Alberta Legislation
Gravel Pit Supervisor c/w vehicle		55.00	605	
Weigh Scale person		20.00	220	
5 yd ³ rubber tired loader (on-board scales)		260.00	2860	6 yd ³ Lafarge 2017 rate as per their quote to City of Calgary
Stripping & Crushing Costs	3.50		3638.25	
Noise Abatement Monitoring		1.50	16.5	As per their application notes
Dust Control and Monitoring		1.50	16.5	As per their application notes
Rockyview taxes			33	\$6000.00 yearly /180 working days as per their application permit
Rockyview Offsite Levy	0.10		103.95	1039.5 tonnes day x \$0.10/t
Royalty to Landowner	1.50		1559.25	
Electrical power			7.00	\$210.00 monthly
Telephone/fax/internet			7.00	\$210.00 montly
Roadway pavement sweeping			20.00	
Reclamation, seeding	0.05		52.00	
Accounting, head office oversight	0.20		207.90	
		338.00	9762.15	This Total is only a single pit Input Cost

Revenue Based on Rockyview Permit Application (McNair & Lafarge)

63 truckloads @ 33 tonnes each 2079 t 10.00/tonne **20,790.00**

Based on average per tonne blended price of pitrun, 25mm road gravel, 75 mm drainage rock, etc.

Therefore the Total Input Costs for both pits is \$9762.15 x 2 = \$19,524.30



APPENDIX 3

PHOTOS



PHOTO 1 Hidden Intersection Hwy 776



PHOTO 2 Wildlife Crossing Hwy 766



PHOTO 3 Junction Hwy 766 & Hwy 567



PHOTO 4 Junction Hwy 766 & Hwy 567



PHOTO 5 Junction Hwy 766 & Hwy 567



PHOTO 6 Junction Hwy 766 & Hwy 567



PHOTO 7 Tandem Truck & Tridem Pup



PHOTO 8 Scooters on Narrow Shoulder of Hwy 567



PHOTO 9 Scooters on Narrow Shoulder of Hwy 567



PHOTO 10 Scooters on Narrow Shoulder of Hwy 567



PHOTO 11 School Bus Sign Hwy 567



PHOTO 12 Hillstone (Big Hill Springs) Gravel Pit Hwy 567



PHOTO 13 Bicycles on Hwy 567



PHOTO 14 Greendrop Gravel Pit Hwy 22



PHOTO 15 Bicycles on Hwy 766



PHOTO 16 Bicycles on Hwy 766



PHOTO 17 Hidden Intersection Hwy 567 WB & Bearspaw Road



PHOTO 18 Hidden Intersection Hwy 567 WB & Bearspaw Road



PHOTO 19 Bicycles on Hwy 567



PHOTO 20 Hwy 567 Big Hill Springs Intersection



PHOTO 21 Hunt Coulee Hwy 567 EB



PHOTO 22 Hunt Coulee Hwy 567 EB



PHOTO 23 Hunt Coulee Hwy 567 EB



PHOTO 24 Tandem Truck & Quad Wagon



PHOTO 25 Hwy 772 & Hwy 566



PHOTO 26 Hwy 566 EB



PHOTO 27 Hwy 566 EB



PHOTO 28 Hwy 566 EB



PHOTO 29 Hwy 566 WB



PHOTO 30 Hwy 566 WB & HWY 772



PHOTO 31 Hwy 567 WB, Trucks EB



PHOTO 32 Hwy 567 WB – Long Sag Curve



PHOTO 33 Hwy 22 NB – Heavy Trucks



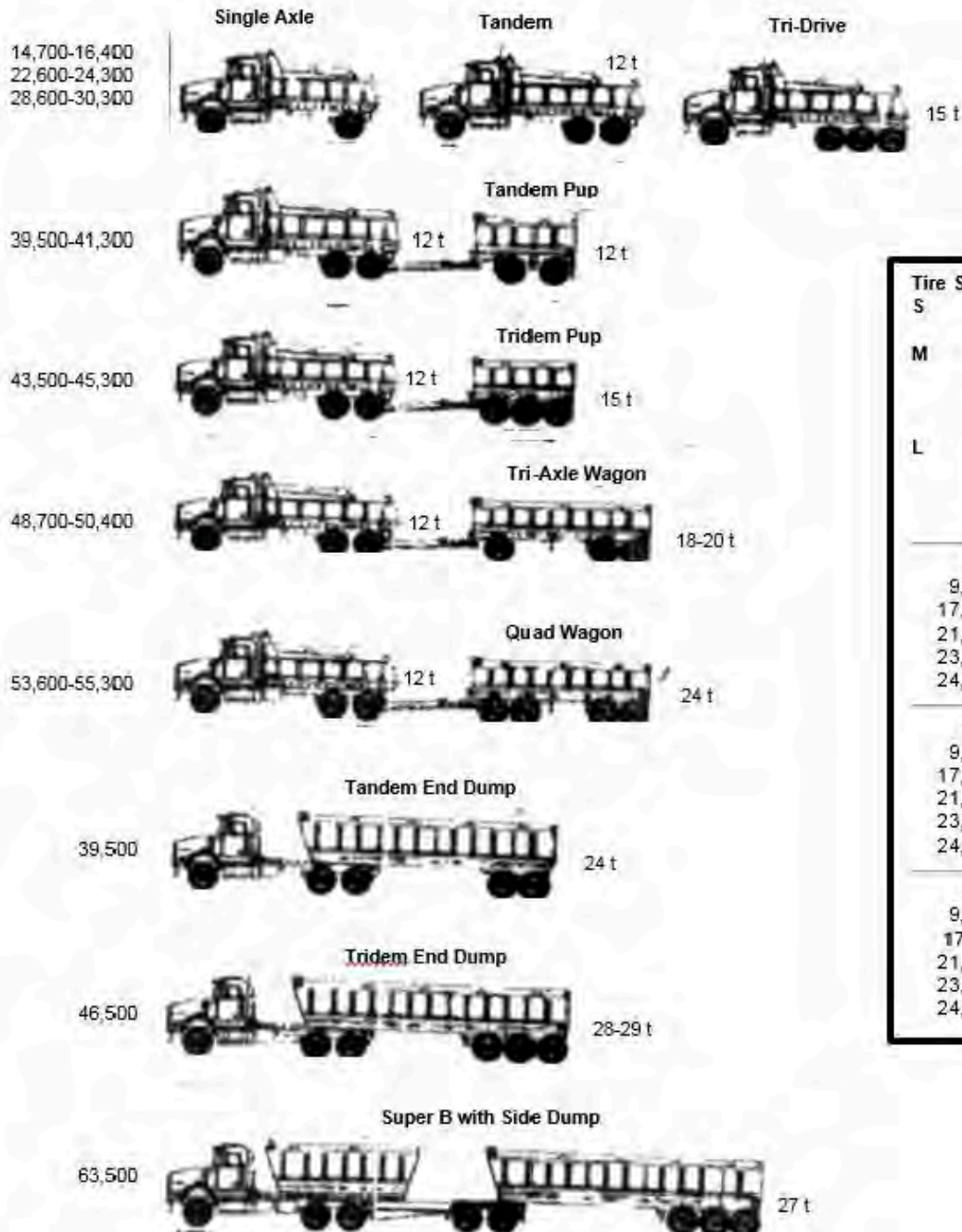
PHOTO 34 Ball-Bank Indicator

APPENDIX 4

AGGREGATE TRUCK TYPES & PERFORMANCE CURVES

AGGREGATE TRUCK MODES OF TRANSPORT

with CORRESPONDING Gross Vehicle Weights



Tire Size	
S	11R – 5,000 kg
M	12R – 6,100 kg 315 – 6,300 kg 13R – 6,600 kg
L	14R – 7,100 kg 365 – 7,300 kg 385 – 7,700 kg (Permit Required)
90% Road Ban	
	9,100 kg = 8,200 kg
	17,000 kg = 15,300 kg
	21,000 kg = 18,900 kg
	23,000 kg = 20,700 kg
	24,000 kg = 21,600 kg
75% Road Ban	
	9,100 kg = 6,800 kg
	17,000 kg = 15,300 kg
	21,000 kg = 15,750 kg
	23,000 kg = 17,250 kg
	24,000 kg = 18,000 kg
50% Road Ban	
	9,100 kg = 4,550 kg
	17,000 kg = 8,500 kg
	21,000 kg = 10,500 kg
	23,000 kg = 11,500 kg
	24,000 kg = 12,000 kg

Geometric Design Guide for Canadian Road
Chapter 3 – Alignment and Lane Configuration

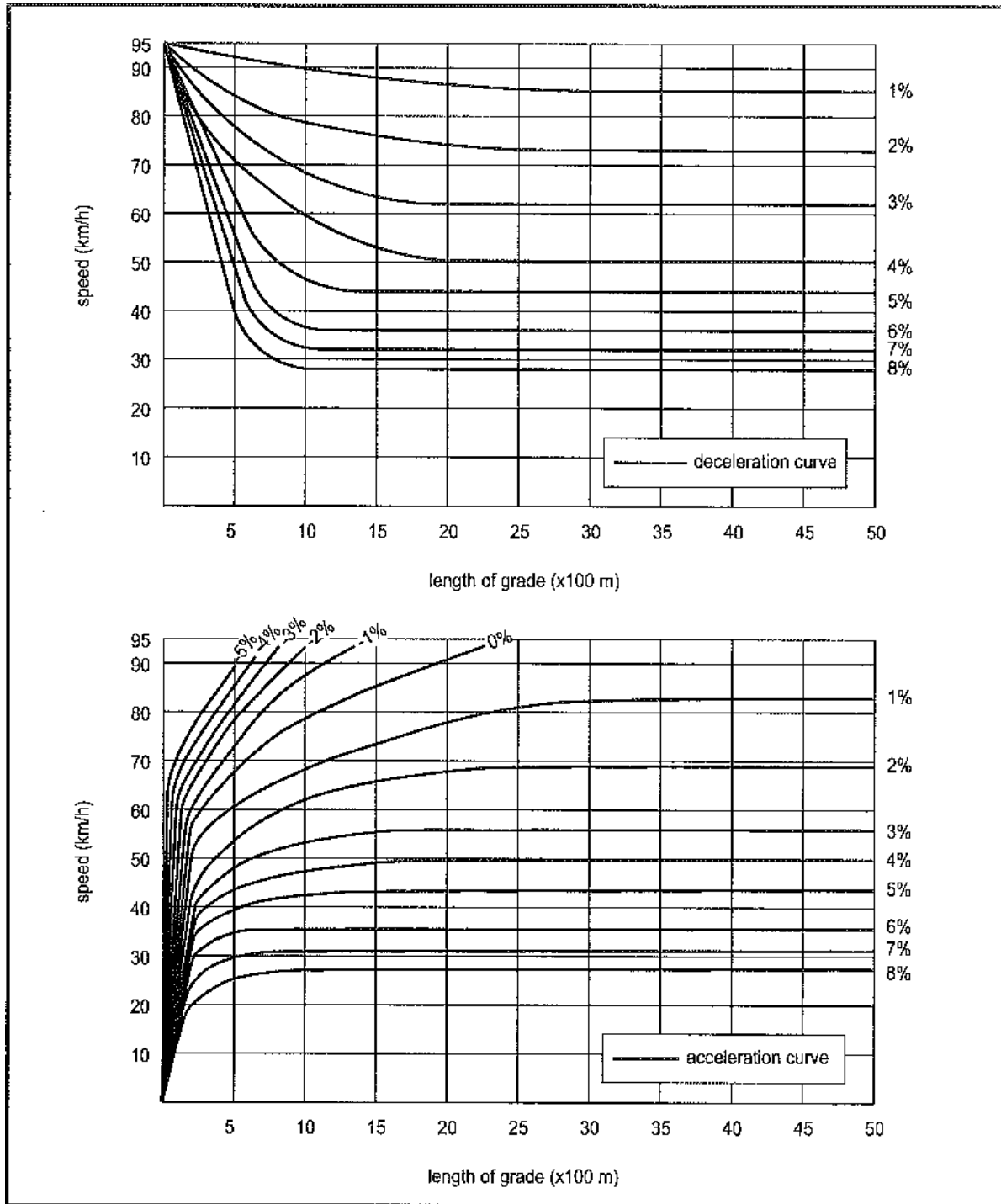


Figure 3.8.2: Performance Curves for Heavy Trucks, 120 g/W, Decelerations and Accelerations⁹¹

Geometric Design Guide for Canadian Road
Chapter 3 – Alignment and Lane Configuration

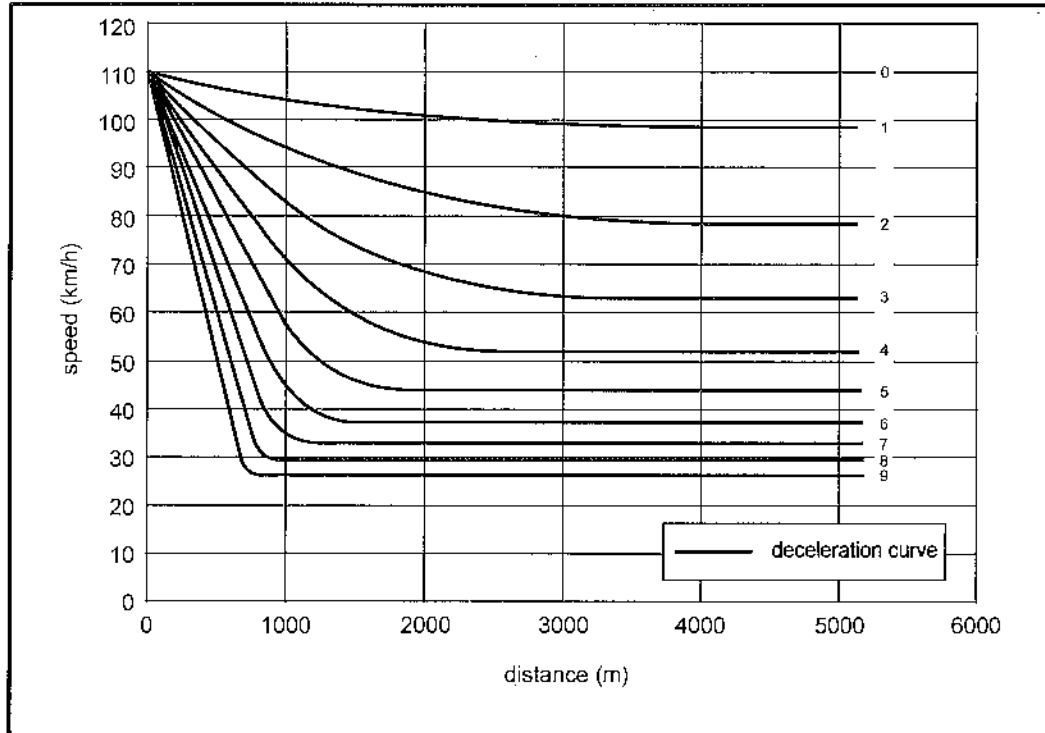


Figure 3.8.5: Performance curve for heavy trucks 120 g/W,
Deceleration with 110 km/h entering speed⁹⁴

Table 3.8.1: Lengths of Grade for 15 km/h Speed Reduction⁹⁵

Design Truck Mass/ Power Rating	Percent Grade						
	2	3	4	5	6	7	8
60 g/W	N/A	N/A	740	410	240	190	180
120 g/W	N/A	N/A	440	280	240	200	160
150 g/W	730	360	280	220	170	140	-
180 g/W *	550	340	260	210	160	120	-
200 g/W	520	320	260	210	160	120	-

- Notes:
1. Length of specified grade in metres at which the designated design truck speed is reduced by 15 km/h from its entry (entry speed assumed to be 95 km/h)
 2. Conversion factor: 1 g/W = 1.645 lb/hp
 3. Values have been rounded
 4. * 180 g/W is normally used for 2 lane highway

Geometric Design Guide for Canadian Road
Chapter 3 – Alignment and Lane Configuration

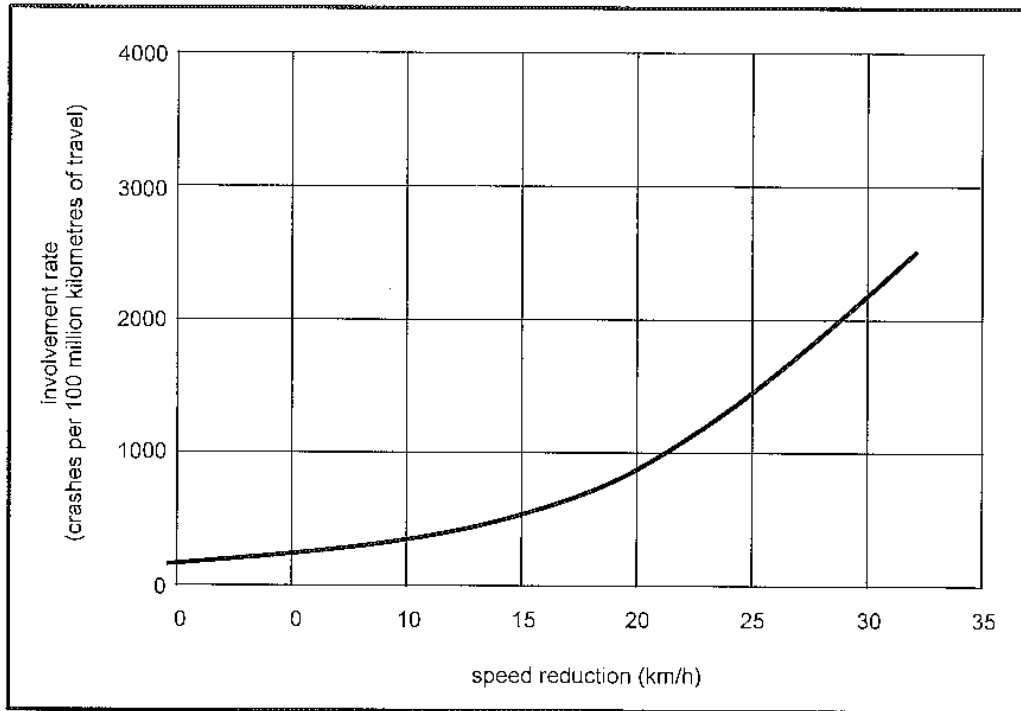


Figure 3.8.1: Collision Involvement Rate for Trucks⁹⁰

In Situ Performance Data of Common Aggregate Hauling Truck

Coco Haulings Ltd/Aly M. Lakha November 11/2017
Mack Granite Tandem Truck with a tri axle pup

GVW	45110 Kgs	16870 Kgs	42890 Kgs	16870 Kgs	43,320 kgs	16870 Kgs	48240 kgs	16870 Kgs
Tare	16870 Kgs	16870 Kgs	16870 Kgs	16870 Kgs	16870 Kgs	16870 Kgs	16870 Kgs	16870 Kgs
Hwy 567	EB	WB	EB	WB	EB	WB	EB	WB
Time	7:19	9:15	9:23	11:20	11:28	1:20	1:28	3:40
Empty/loaded	Loaded	Empty	Loaded	Empty	Loaded	Empty	Loaded	Empty
Speed Big Hill Springs Hill	65 Khp	70 Kph	70 Kph	65 Kph	65 Kph	65 Kph	68 Kph	70 Kph
Speed S Bend	33 Kph	68 Kph	32Kph	68 Kph	29 Kph	68 Kph	29 Kph	68 Kph

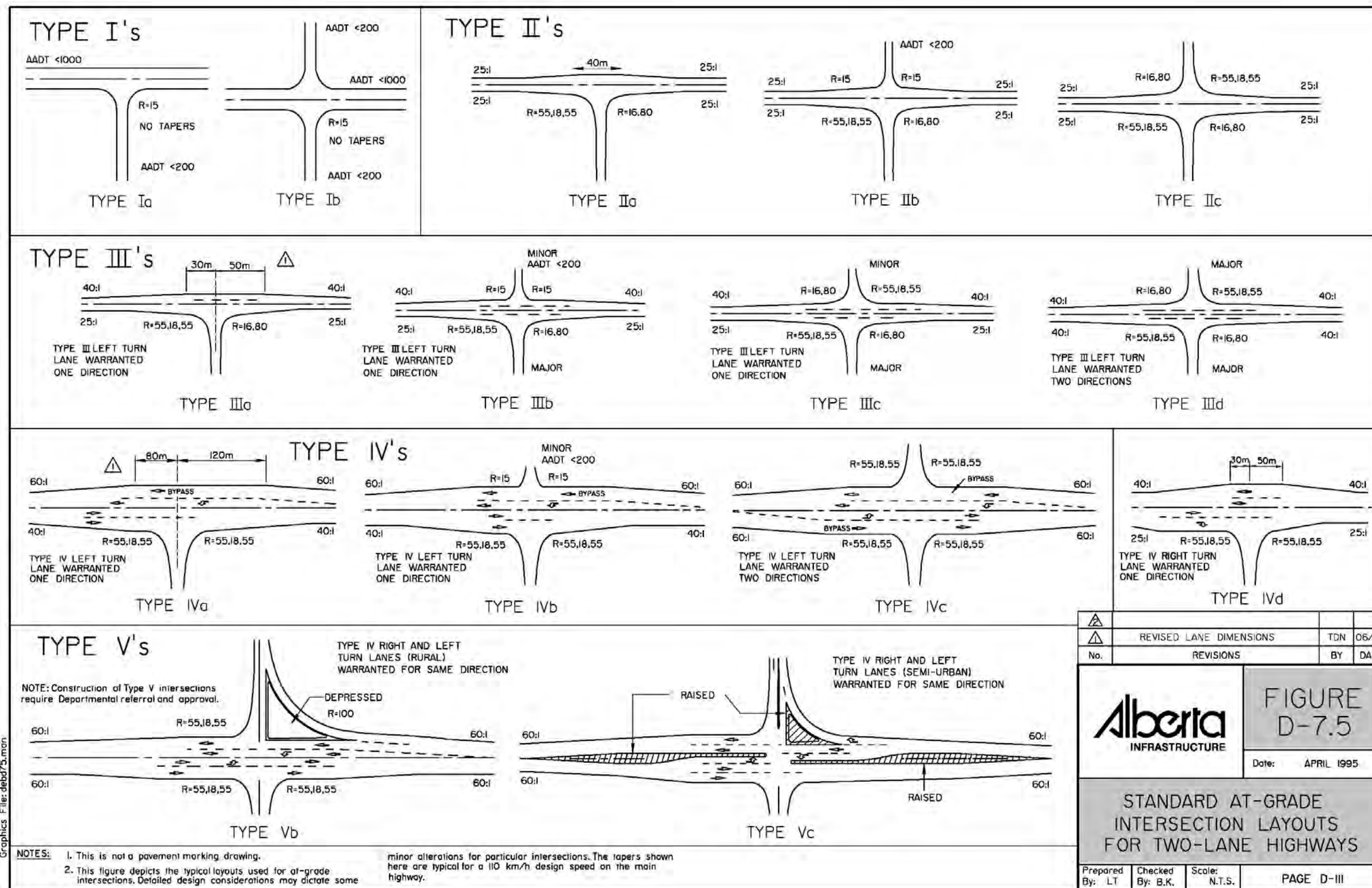
Coco Haulings Ltd/Aly M. Lakha November 10/2017
Mack Granite Tandem Truck with a tri axle pup

GVW	33,310 kgs	16,460 Kgs	42,890 kgs	16,460 Kgs	43,220 kgs	16,460 Kgs	43620 kgs	16,460 Kgs
Tare	16,460 Kgs	16,460 Kgs	16,460 Kgs	16,460 Kgs	16,460 Kgs	16,460 Kgs	16,460 Kgs	16,460 Kgs
Hwy 567	EB	WB	EB	WB	EB	WB	EB	WB
Time	8:03	10:15	10:25	12:30	12:41	3:05	3:16	4:25
Empty/loaded	Loaded	Empty	Loaded	Empty	Loaded	Empty	Loaded	Empty
Speed Big Hill Springs Hill	55 Kph	68 Kph	70 Kph	70 Kph	72 Kph	70 Kph	68 Kph	70 Kph
Speed S Bend	28 Kph	68 Kph	32Kph	68 Kph	32 Kph	68 Kph	29 Kph	68 Kph

APPENDIX 5

ALBERTA INFRASTRUCTURE

STANDARD AT-GRADE INTERSECTION LAYOUTS



Graphics File: debd75.man



APPENDIX 6

HILLSTONE AGGREGATES TRAFFIC UPDATE
HIGHWAY 567 INTERSECTION REVIEW – 2017 UPDATE

TRANSPORTATION PLANNERS AND ENGINEERS


 bunt
& associates

March 1, 2017
1397-04

Robert Kelham, P.Eng.
Kelham & Associates Inc.
70 Jewell Street
Red Deer, Alberta T4P 3W3

Dear Rob,

**Re: Hillstone Aggregates Traffic Update
Highway 567 Intersection Review - 2017 Update**

As requested, this is an update to the traffic work completed by Bunt & Associates in 2012 & 2015 regarding the Hillstone Aggregates site located along Highway 567, east of Highway 22. This update focuses on the warrant for the intersection treatment of the Highway 567 & Hillstone Aggregates site access intersection.

Per the previous analysis, a Type II intersection treatment was warranted at the site access. Recent traffic data was collected for the purpose of reanalyzing the intersection treatment to determine if traffic conditions have changed over the past 2 years to such an extent that alters the previous intersection treatment conclusion. The updated intersection treatment analysis is outlined in this letter.

EXISTING TRAFFIC CONDITIONS

To determine existing traffic at the site access, Bunt & Associates conducted a 48 hour vehicle turning movement count at the intersection of Highway 567 & Hillstone Aggregates site access on Tuesday February 14, 2017. The resulting AADT (Average Annual Daily Traffic) volumes were converted to ASDT (Average Summer Daily Traffic) volumes through increasing volumes proportionately with the Alberta Transportation 2015 AADT & ASDT volume counts along Highway 567 east of Highway 22. Both the AADT & ASDT volumes will be used to analyze intersection treatment in two separate scenarios.

Load counts for the year of 2016 were obtained from Hillstone Aggregates to determine the appropriate site traffic volumes to be added to the 2017 AADT & ASDT volumes and were distributed 80% to/from the east and 20% to/from the west as was done in the 2015 analysis. Monthly load data was converted to loads per day based on the average number of working days per month, assuming 25 weekdays and 4 Saturdays per month (Saturdays are worked from May - October). A concentration factor of 20% was

Bunt & Associates Engineering (Alberta) Ltd.

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applied to the calculated loads per day to account for fluctuations of loads per day throughout a month. A summary of the adjusted loads per day is presented in Table 1.

Table 0: 2016 Adjusted Loads per Day

Month	Loads	Workdays	Loads per Day	Adjusted Loads per Day
January	342	25	13.68	16.42
February	247	25	9.88	11.86
March	202	25	8.08	9.70
April	507	25	20.28	24.34
May	682	29	23.52	28.22
June	1379	29	47.55	57.06
July	1277	29	44.03	52.84
August	2088	29	72.00	86.40
September	2305	29	79.48	95.38
October	2816	29	97.10	116.52
November	2463	25	98.52	118.22
December	654	25	26.16	31.39

Based on the adjusted loads per day shown above, the 90th percentile daily loads is 117 per day, which translates to 117 trips in and 117 trips out to be added to the 2017 AADT & ASDT volumes.

The summarized Bunt & Associates turning movement count, Alberta Transportation traffic volume history, and Hillstone Aggregates 2016 load count are attached to this letter.

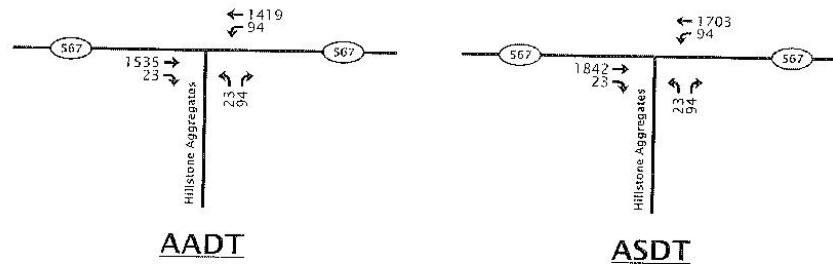
INTERSECTION TREATMENT ANALYSIS

According to the Alberta Transportation Highway Geometric Design Guide, the intersection of Highway 567 & Hillstone Aggregates site access continues to meet the warrant for a Type II intersection treatment in both the 2017 AADT & ASDT volume scenarios. Left turn warrant analysis using peak hour volumes is used to confirm the warranted intersection treatment. The AADT & ASDT volumes used in the intersection treatment analysis are presented in Figure 1.

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Figure 1 AADT & ASDT Volumes

**Left Turn Warrant**

AADT & ASDT volumes were converted to peak hour volumes by dividing daily movement volumes by 10 and were then used for left turn warrant analysis. The left turn warrant analysis takes opposing vs advancing volumes and left turn percentage into consideration in determining the appropriate intersection treatment.

The results of the left turn warrant analysis confirmed that a Type II treatment continues to be warranted for this intersection in both the 2017 AADT & ASDT volume scenarios and that the conclusions found in the 2015 analysis remain unchanged.

Right Turn Warrant

To warrant an exclusive right turn lane at a two-lane highway intersection in Alberta, the following three conditions must all be met:

1. Main road AADT > 1800
2. Intersecting road AADT > 900
3. Right turn daily traffic volume > 360 for the movement in question.

As only condition 1 is met in both the 2017 AADT & ASDT volume scenarios, an exclusive right turn lane is not warranted at this intersection, though is still advisable given the proportion of heavy vehicle accessing the site as was previously recommended by Bunt & Associates in the 2015 analysis.

All charts and guidelines associated with the above intersection treatment analysis are attached to this letter.

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SUMMARY AND CONCLUSIONS

The purpose for the update analysis outlined in this letter was to assess if the Bunt & Associates 2015 study recommendations were still valid at the Highway 567/ Hillstone Aggregates site access intersection as a result of the existing gravel pit extraction operation and volumes on Highway 567.

Based on the updated 2016 traffic information provided by the owner, the analysis confirms that the findings from the original Bunt & Associates 2012 report and 2015 update are still valid and are re-presented here for information purposes:

- Upgrade to a Type II intersection design given the propensity for heavy vehicles to be a dominant component of the turning vehicle flow.
- Although not technically warranted based on volume, consider the addition of a separate right turn lane if future distribution of job contracts (and therefore load destinations and return deadhead arrivals) suggests a shift to the west as the primary direction of approach.

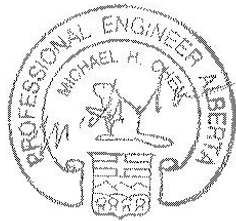
This concludes Bunt & Associates' 2017 updated review of the existing impact of the Hillstone Aggregate Gravel Pit site on the intersection of Highway 567 and the site access east of Highway 22. Please call if you have any questions or wish to discuss any issue in further detail.

Yours truly,
Bunt & Associates

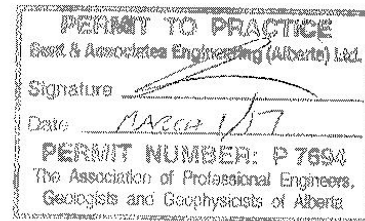


Michael Chen, P.Eng.
Senior Transportation Engineer

MC/BNJM



March 1, 2017



ALBERTA HIGHWAYS 1 TO 866
TRAFFIC VOLUME HISTORY 2006 - 2015

Alberta Transportation
Strategy and Policy Branch

Produced: 18-Feb-2016 By ComerStone Solutions Inc.

Hwy	CS	TCS	Muni	From	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	
					AADT	AADT	AADT	AADT	AADT	AADT	AADT	AADT	AADT	AADT	AADT
564	4	8	Rkyv	W OF 791 EJ N OF DELACOUR											
564	4	8	Rkyv	E OF 791 EJ N OF DELACOUR								2260	2260	2260	2550
564	4	8	Rkyv	W OF 9 N OF DALROY								1980	1980	1980	2240
564	6	4	Rkyv	E OF 9 N OF DALROY	1400	1450	1430	1450	1420	1410	1420	1460	1460	1460	1650
564	6	4	WhitL	W OF 817 W OF NIGHTINGALE	1370	1420	1390	1400	1380	1440	1470	1510	1510	1530	1730
564	6	8	WhitL	E OF 817 W OF NIGHTINGALE	1490	1550	1530	1530	1530	1690	1690	1690	1690	1690	1910
564	6	8	WhitL	W OF 21 E OF NIGHTINGALE SJ	1070	1110	1090	1090	1090	1220	1220	1220	1220	1220	1380
564	8	4	WhitL	E OF 21 NE OF NIGHTINGALE NJ	940	980	960	940	930	930	930	930	930	920	1040
564	8	4	WhitL	W OF 840 N OF STANDARD	440	480	480	480	480	700	700	700	700	700	790
564	8	8	WhitL	E OF 840 N OF STANDARD	330	330	330	360	360	400	400	400	570	570	640
564	8	8	WhitL	W OF 842 NE OF CHANCELLOR	130	130	130	280	280	320	320	320	320	320	360
564	8	12	WhitL	E OF 842 NE OF CHANCELLOR	110	110	110	110	110	320	320	320	320	320	360
564	8	12	WhitL	W OF 56 NE OF HUSSAR	110	110	110	110	110	330	330	330	330	330	370
564	10	4	WhitL	E OF 56 NE OF HUSSAR	180	180	180	180	180	270	270	270	270	270	300
564	10	4	WhitL	W OF TWP RD 260 34-25-18-4000000000	240	250	240	230	230	300	300	300	300	300	350
564	10	5	WhitL	N OF RGE RD 182 34-25-18-4000000000	170	170	170	170	130	130	130	130	130	140	170
564	10	5	WhitL	S OF 848 SW OF DOROTHY	90	90	90	90	90	90	90	90	90	90	110
564	10	8	WhitL	W OF 848 SW OF DOROTHY	80	80	80	80	80	80	80	80	80	80	90
564	10	8	WhitL	S OF 569 SW OF WESTERN MONARCH	40	40	40	40	40	40	40	40	40	40	50
566	2	4	Rkyv	E OF 772 W OF BALZAC	120	120	120	120	120	100	100	100	100	100	120
566	3	4	Rkyv	W OF RGE RD 13 9-27-1-5000000000	900	900	900	900	900	940	940	940	960	960	1020
566	3	8	Rkyv	E OF RGE RD 13 9-27-1-5000000000	2020	2020	2020	2490	2490	2490	2490	2490	2460	2460	2620
566	4	10	Rkyv	W OF 2 E OF BALZAC	1920	1920	1920	5360	5360	5360	5360	5360	4260	4260	4540
566	4	12	Rkyv	E OF 2 E OF BALZAC	3250	3540	3600	8450	8990	8320	8910	9270	9670	11720	12480
566	4	14	Rkyv	W OF DWIGHT MCLELLAN TR 9-26-29-4000000000	4310	4540	4650	11640	12400	13520	14460	15030	15690	18900	20120
566	4	14	Rkyv	E OF DWIGHT MCLELLAN TR 9-26-29-4000000000							6700	6840	6920	7280	7750
566	4	14	Rkyv	W OF RGE RD 292 10-26-29-4000000000							5960	6080	6150	6450	6870
566	4	14	Rkyv	E OF RGE RD 292 10-26-29-4000000000							5960	6080	6150	6450	6870
566	4	16	Rkyv	W OF RGE RD 290 E OF BALZAC 12-26-29-4000000000							4490	4590	4620	4820	5130
566	4	16	Rkyv	E OF RGE RD 290 E OF BALZAC 12-26-29-4000000000								2780	2800	2850	3220
566	4	16	Rkyv	W OF RGE RD 284 E OF BALZAC 8-26-28-4000000000								2570	2580	2600	2940
566	4	16	Rkyv	E OF RGE RD 284 E OF BALZAC 8-26-28-4000000000								2340	2340	2340	2650
566	4	16	Rkyv	W OF 791 SW OF KATHYRN	1920	1980	1980	1920	1920	1920	1940	2170	2170	2170	2450
566	4	18	Rkyv	E OF 791 SW OF KATHYRN	1840	1900	1900	1860	1860	1880	1900	1900	1900	1900	2150
566	4	18	Rkyv	W OF 9 E OF KATHYRN	1860	1920	1880	1900	1900	1800	1820	1840	1840	1850	2090
567	2	4	Rkyv	E OF 22 N OF COCHRANE	2720	2810	2830	4440	4440	4320	4380	4420	4420	4620	5490
567	2	4	Rkyv	W OF 766 NE OF COCHRANE	2520	2690	3000	3000	3000	3000	3040	3760	3760	3840	4560
567	2	8	Rkyv	E OF 766 NE OF COCHRANE	2190	2250	2840	2840	2840	2840	2880	3370	3370	3420	4060
567	4	4	Rkyv	E OF 772 W OF AIRDRIE SJ	2880	2980	3080	3080	3080	3080	3080	3080	3080	3140	3730
567	4	4	Rkyv	E OF 772 W OF AIRDRIE NJ	2320	2400	2400	2400	2400	2240	2240	2240	2280	2280	2430
567	6	10	Rkyv	W OF 791 SE OF KERSEY WJ	2300	2300	2300	2300	2300	2470	2470	2470	2470	2470	2790



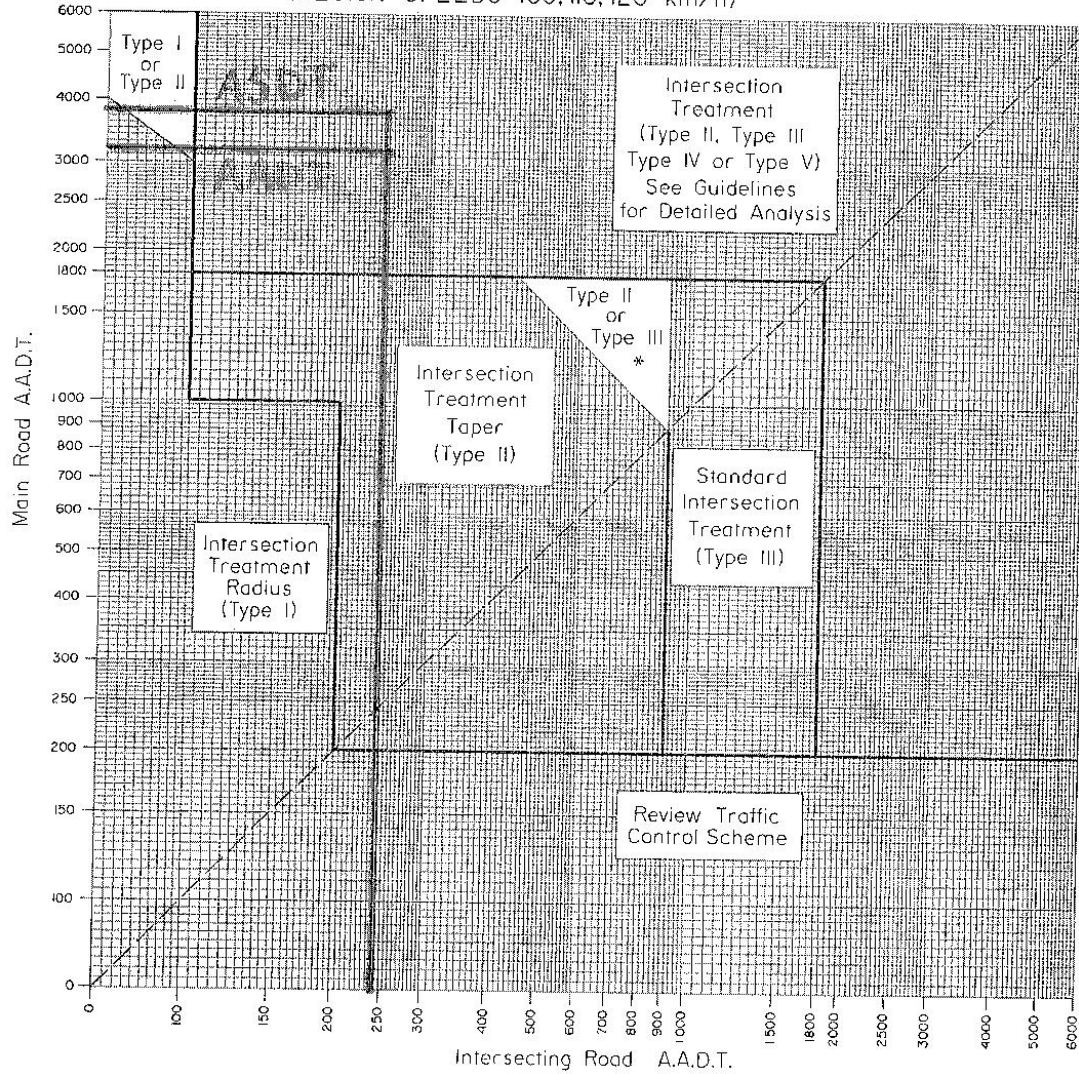
HILLSTONE
AGGREGATES

Load Count 2016	
Month	Count
January	342
February	247
March	202
April	507
May	682
June	1379
July	1277
August	2088
September	2305
October	2816
November	2463
December	654
Total Loads 2016:	14962

APRIL 1995

Alberta Infrastructure
HIGHWAY GEOMETRIC DESIGN GUIDE

FIGURE D-7.4 TRAFFIC VOLUME WARRANT CHART FOR AT-GRADE INTERSECTION TREATMENT ON TWO-LANE RURAL HIGHWAYS (DESIGN SPEEDS 100, 110, 120 km/h)



Notes:

1. If main road, or intersecting road, is <100 AADT provide Type I Intersection Treatment (15m radius), except as shown for the higher volume main roads on this chart (Type I or II zone) where engineering judgement may be used to select the appropriate treatment.
2. If main road is >4000 AADT Review Access Management
 - - - If Intersecting Road AADT is > Main Road AADT: Review Traffic Control Scheme
3. Use projected traffic volumes for design
 Sloping line is defined by Main Road AADT x Intersecting Road AADT = 800,000

D-110

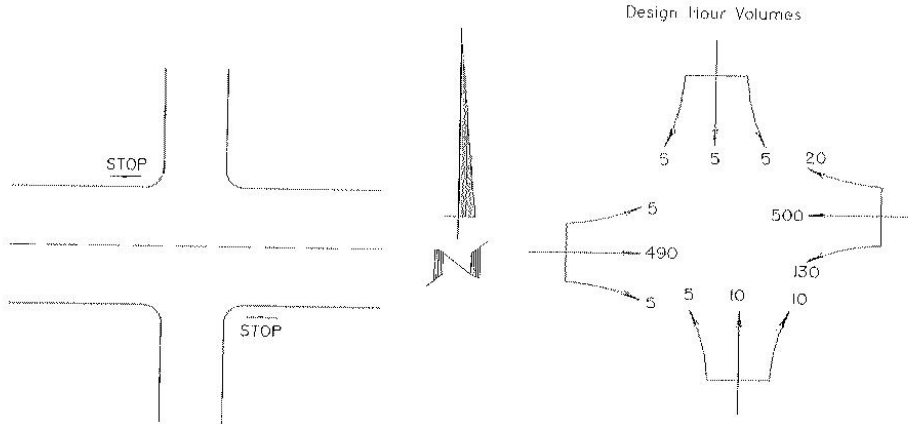
AT-GRADE INTERSECTIONS

AUGUST 1999

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Example of Chart Use

Given: Two-Lane Highway
Design Speed = 110 km/h
Percent of Trucks in $V\ell$ = 15%



A left turn lane with suitable storage space is being considered for left turning vehicles on the East approach.

$V\ell = 130$ v.p.h.		(Number of Left Turning Vehicles Per Hour in the Advancing Volume)
$Va = 500 + 20 + 130$	$= 650$ v.p.h.	(Advancing Volume)
$L = V\ell / Va = 130 / 650$	$= 20\%$	(Proportion of Left Turns in Va)
$Vo = 490 + 5 + 5$	$= 500$ v.p.h.	(Opposing Volume)
Entering chart with	$Vo = 500$ v.p.h.	
	$Va = 650$ v.p.h.	
	$L = 20\%$	

We find from Figure D-7.6-7b that a left turn lane is warranted and the required additional storage space is 35m. Since 15 percent of $V\ell$ are trucks, from Table D.7.6a, the additional storage requirements due to trucks is 10m. Therefore, a left turn is warranted for this direction and standard intersection Type IVb (Figure D-7k) should be used. An additional storage

length of 45m (35m due to volume plus 10m due to trucks) should be added to the left turn lane.

The standard Type IV treatment has 15 m of storage built in due to the design speed, taper and parallel lane (see Table D.7.6b). Therefore the additional storage necessary is 30 m i.e. 45 m - 15 m.

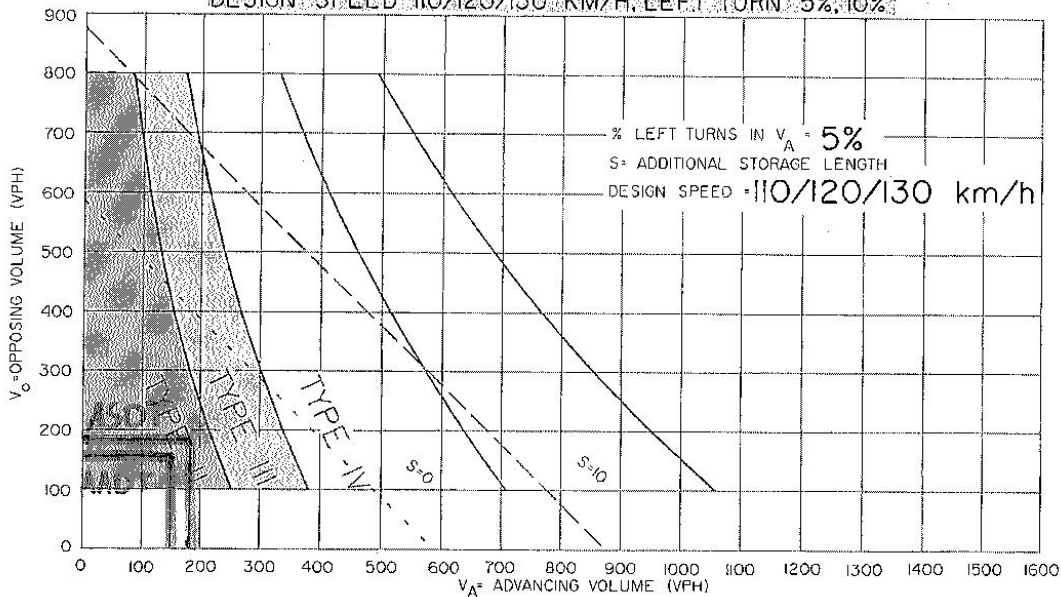
D-140

AT-GRADE INTERSECTIONS

AUGUST 1999

ROADWAY INFRASTRUCTURE
HIGHWAY GEOMETRIC DESIGN GUIDE

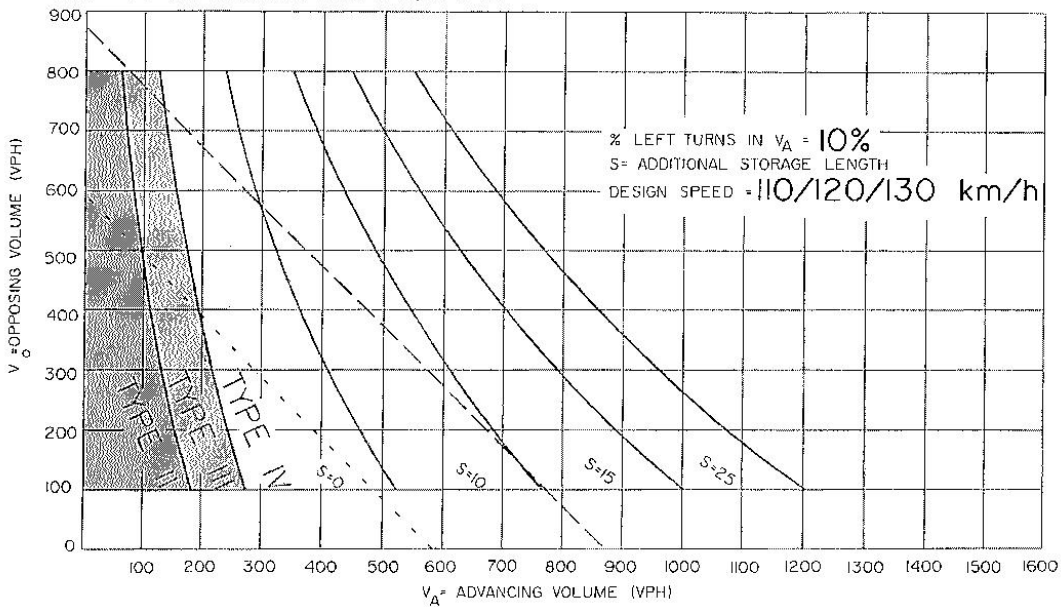
FIGURE D-7.6-7a WARRANTS FOR LEFT-TURN LANES AND STORAGE REQUIREMENTS FOR TWO-LANE HIGHWAYS
DESIGN SPEED 110/120/130 KM/H, LEFT TURN 5%, 10%



S = Additional storage length required, that is, in addition to what is shown on the appropriate Type IV standard drawing. Designers should check additional storage requirements for trucks, also see Table D.7.6a.
 - - - Traffic signals may be warranted in rural areas, or urban areas, with restricted flow.
 - - - Traffic signals may be warranted in "free flow" urban areas.

Notes:

1. The traffic signal warrant lines are provided for reference only. For detailed analysis of the requirements for signals, contact Roadway Engineering Branch.
2. Warrant for Type I treatment is shown in Figure D-7.4.



D-166

AT-GRADE INTERSECTIONS

Table D.7.6.1 Warrant Probabilities

Design Speed (km/h)	Assumed 85th Percentile Running Speed (km/h)	Maximum Allowable Probability of an Arrival Behind a Left Turning Vehicle	
		Soft Conversion	Hard Conversion
130/120/110	110	0.005	0.0058
100	100	0.010	0.0089
90	90	-	0.0120
80	80	0.015	0.0151
70	70	-	0.0182
60	60	-	0.0214
50	50	-	0.0245

* Note: The odd numbers are generated due to a hard conversion from imperial units (for design speed) to metric. The odd numbers are used to produce warrant graphs which, if interpolated, would correspond exactly with the imperial graphs. The values used for 50, 60, 70 and 90 km/h are extrapolated. The current Ontario manual uses the same probabilities for each design speed as Alberta.

D.7.7 Warrant for Right Turn Lane

To warrant an exclusive right turn lane at a two-lane highway intersection in Alberta, the following three conditions must all be met:

1. Main (or through) road AADT ≥ 1800
2. Intersecting road AADT ≥ 900 , and
3. Right turn daily traffic volume ≥ 360 for the movement in question.

If an exclusive right turn lane is warranted, the standard layout shown on Type IVd (Figure D-7m) should be used. Adjustment to the length of parallel lane may be required if the gradient on the main (or through) highway exceeds two percent. Refer to Table D.6.2.6.

D.7.8 Warrant for Channelization

A channelized intersection may be warranted at intersections that have high through traffic volumes (above 4000 AADT) and one or more predominant

turning movements. The need for channelized treatment is site specific. However, where both left and right turn lanes are required, this is usually a good candidate for channelization. The use of channelization is suggested in this case for two reasons:


1. A six-lane flared intersection is very wide, requires additional time for crossing and can be confusing for drivers on the intersecting road.
2. With large numbers of turning movements, there could be excessive delay for vehicles on the intersecting road, which could be reduced considerably by construction of a right turn roadway.

The designer should use the principles in the design of a channelized intersection as described in Section D.6.3.

Examples of typical channelized intersection layouts for rural and semi-urban environments are shown in Figures D-6.3.6a and D-6.3.6b, respectively.

APPENDIX 7

METHODS FOR ESTABLISHING SAFE SPEEDS ON CURVES

 Alberta <small>INDUSTRIES, ENERGY AND TRANSPORTATION</small>	METHODS FOR ESTABLISHING SAFE SPEEDS ON CURVES		<i>Issued: NOV 2004</i>
			<i>Revised: DEC 2006</i>
			<i>Page 1 of 4</i>
RECOMMENDED PRACTICES	PART	TRAFFIC OPERATIONS	
	SECTION		
	SUB-SECTION		

General

Collision exposure is usually greater along horizontal curves than along tangent sections of a highway. The potential for collisions is significantly increased when the safe travelling speed along a curve is below the posted speed along a tangent segment of the highway.

The safe travelling speed at which a curve may be negotiated is normally established through ball-bank indicator testing.

The established advisory speed must be both realistic and safe, meeting drivers' expectations for a given set of geometric, operational, and environmental conditions. Motorists are advised about safe speeds along curves through the use of an Advisory Speed tab.

Ball-Bank Indicator Testing

Ball-bank indicator testing is the most common and practical way of determining advisory speeds on curves.

During testing, the device is mounted in a vehicle and ball-bank readings are taken at different speeds along a curve to determine safe travelling speed.

The centripetal acceleration developed as a vehicle travels at a uniform speed on a curve causes the ball to roll out to a fixed angle.

At any time, the ball-bank reading indicates the combined effect of a body roll, lateral acceleration angle, and superelevation as shown in Figure 1.

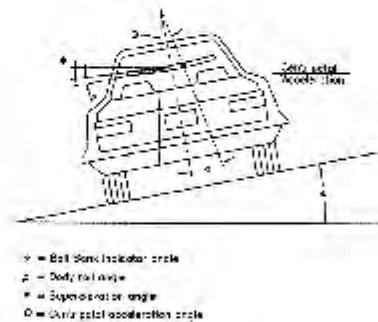



Figure 1 – The effect of the centripetal acceleration acting on a vehicle while traveling along a curve.

Usually several readings are taken at different speeds until a satisfactory speed-angle combination is obtained.

	METHODS FOR ESTABLISHING SAFE SPEEDS ON CURVES	Issued: NOV 2004
		Revised: DEC 2006
		Page 2 of 4

An example of a ball-bank reading is illustrated below in Figure 2.

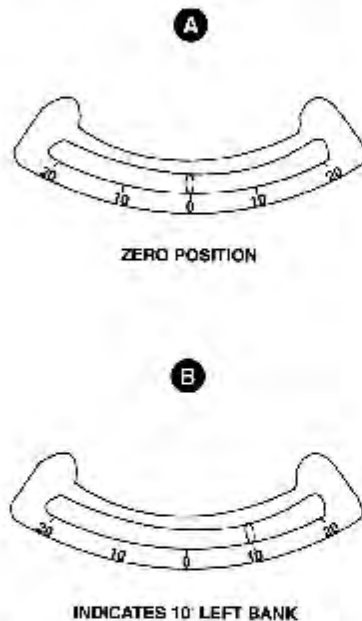


Figure 2 - A display with ball-bank indicator readings.

Table 1 shows the maximum ball-bank reading to be used when determining the maximum safe operating speed.

Table 1

Maximum Ball-Bank Reading	Maximum Safe Operating Speed (Paved surfaces)
10°	Speeds 55 to 100 km/h may be accommodated.
12°	Speeds 40 to 50 km/h may be accommodated.
14°	Speeds 30 km/h or less are accommodated. Curve should be signed for the speed at which the reading occurs.

Source: AASHTO *Policy on Geometric Design of Highways and Streets*

Note: The applicable ball-bank reading should be reduced by one (1°) degree for gravel surfaces.

Types of Ball-Bank Indicators

The two most common types of ball-bank indicators are a manual and electronic indicator.



Figure 3 - Example of a Manual Ball-Bank Indicator

A manual ball-bank indicator consists of a steel ball in a sealed glass tube. Except for the damping effect of the liquid in the tube, the ball is free to roll.


	METHODS FOR ESTABLISHING SAFE SPEEDS ON CURVES	Issued: NOV 2004
		Revised: DEC 2006
		Page 3 of 4



Figure 4 - Example of an Electronic Ball-Bank Indicator

The electronic ball-bank indicator unit has a digital angle display in degrees and often has a feature that allows for the transfer of data to a personal computer.

More information on ball-bank indicator testing is provided in engineering handbooks such as the *Traffic Engineering Handbook* or *AASHTO Policy on Geometric Design of Highways and Streets*.

Testing Procedure

During testing, the ball-bank indicator is mounted to the dashboard with rubber suction cups or by other stable methods. The device position is then adjusted to allow the ball to rest freely at zero degrees when the vehicle is standing on a level surface (i.e., on a tangent section).

Vehicle movement around a curve causes the ball to swing from the zero position (e.g., vehicle movement to the left causes the ball to swing to the right). The faster the vehicle moves around the curve or the sharper the curve, the greater the distance the ball swings away from the zero degree position.

The following steps should be considered during the testing procedure:

- 1) Testing should start well in advance of the curve being evaluated. The driver should enter the curve at a predetermined speed and should try to maintain the assumed speed throughout the curve. If possible, the car should be centered on a travel lane and driven as parallel as possible to the roadway centerline.
- 2) The first trial run should be made at a speed somewhat below the anticipated maximum safe speed. Subsequent trial runs are conducted at 10 km/h speed increments.
- 3) The curve should be driven a number of times until at least two matching ball bank readings (i.e., number of degrees) are obtained for each direction of travel. Testing should be conducted separately for each direction of travel.

Establishing Advisory Speed on a Curve

When establishing final advisory speed, consideration should be given to other factors which may be influencing the operation of vehicles around the curve. These factors include geometric conditions (e.g., available sight distances, presence of intersections, obstructions along the road), predisposition to certain collision types (e.g., run-off-road), traffic distribution (e.g., presence of trucks), environmental conditions (e.g., presence of lighting) and other site-specific operational conditions.

An advisory speed that is too high compromises safety because it increases

	METHODS FOR ESTABLISHING SAFE SPEEDS ON CURVES	<i>Issued: NOV 2004</i>
		<i>Revised: DEC 2006</i>
		<i>Page 4 of 4</i>

the potential for collisions (vehicle stability is impacted). An advisory speed that is too low may result in less driver compliance.

If lower advisory speeds are frequently exceeded by drivers without a risk, problems may arise at locations where curves are severe and the safety margin is reduced.

The average roadway operational and environmental conditions, which the advisory speed is going to represent, also have to be taken into consideration. Dry pavement provides better resistance than wet pavement against the centrifugal force encountered on curves. Also, vehicle characteristics have to be considered (i.e., trucks have a higher centre of gravity, which creates a higher potential for a vehicle roll over).

In general, advisory speeds based on conservative ball-bank indicator readings are sufficiently low to safely accommodate trucks and wet pavement conditions.

Ball-bank indicator testing and establishing safe travelling speed on a curve should be performed by qualified personnel. Proper documentation should also be provided for any future reference.

References to Standards

<i>Recommended Practices</i> Section: Warning Signs	Turn and Curve Signs Reverse Turn and Reverse Curve Signs Winding Road Sign
ITE	Traffic Engineering Handbook
AASHTO	Policy on Geometric Design of Highways and Streets.

Jessica Anderson

From: Harry Hodgson [REDACTED]
Sent: Friday, July 03, 2020 6:33 PM
To: Jessica Anderson
Cc: Division 9, Crystal Kissel; minister.municipalaffairs@gov.ab.ca
Subject: [EXTERNAL] - Summit Pit File 06731002 / 1004, Application PL20200031 / 34
Attachments: Pit Entrance Silica Warning.jpg; Summit Pit App.JPG

Do not open links or attachments unless sender and content are known.

Jessica,

I OPPOSE this proposed expanded gravel pit.

I live less than 750 meters from the proposed pit and I will be negatively impacted. Air quality, noise, traffic and depreciated property value.

I moved here before any gravel pits were mentioned and now there is one existing and several more looking for designation to Natural Resource Extraction.

I have heard first account details from residents living next door to gravel pits in the Bearspaw area. Unable to open windows trying to keep the noise and dust out, but everything is still continuously covered in a layer of fine dust. I have heard of kids waking up in the night unable to breath and bloody noses. Unable to sit out on their deck and have a conversation due to the constant dust and noise.

Alberta gravel has a large percentage of silica. This gets introduced into the air during gravel crushing and when you and I breathe it in, it causes Silicosis. Nobody wants to live next door to a pit, the gravel companies them self are aware of this and at one time posted it at the entrance to their pits. But I live here 7/24 for 365 days a year. See attached PIT WARNING. Alberta Sand and Gravel know how bad it is, they offered Silica Hazard Awareness Sessions but I am expected to live next to the proposed pits.

There is gravel in other locations and where there will be less people opposed to a gravel pit.

This site / Summit application has been overturned by Alberta Courts and still under appeal. How can this proceed?

In the counties last decision the councilors recommended the proposed pits working with the local residents but they have done nothing to improve the situation.

I am not against development, I just believe in ONE pit at a time.

Concerned County Resident,

Harry Hodgson

Jessica Anderson

From: Michelle Mitton
Sent: January 28, 2021 5:59 PM
To: Jessica Anderson
Subject: FW: [EXTERNAL] - Public Hearing C8031-2020 and C8064-2020

MICHELLE MITTON, M.Sc
Legislative Coordinator | Legislative Services

ROCKY VIEW COUNTY
262075 Rocky View Point | Rocky View County | AB | T4A 0X2
Phone: 403-520- 1290 |
MMitton@rockyview.ca | www.rockyview.ca

This e-mail, including any attachments, may contain information that is privileged and confidential. If you are not the intended recipient, any dissemination, distribution or copying of this information is prohibited and unlawful. If you received this communication in error, please reply immediately to let me know and then delete this e-mail. Thank you.

From: Keith Koebisch
Sent: January 28, 2021 5:50 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Public Hearing C8031-2020 and C8064-2020

Do not open links or attachments unless sender and content are known.

Keith Koebisch
271-011 Range Rd 40
RVC

To whom it concerns,

I am writing in reference to my opposition to the two Springback ASPs. Although I am not a nearby resident of these development plans, I am still a RVC resident and will explain why am against them.

It is my belief that development and approval of ASPs has gotten seriously out of hand and that the County is more or less planning using the "shotgun method". In other words, we will approve a couple dozen ASPs and maybe one or two will be a "hit". We do not need a MDP to manage the ASPs rather we just need some good sound planning with the support of community and not just the desire of a landowner and developer getting together and trying to hit a home-run with an approved ASP that might not even be built and managed by them, but someone else if they get lucky. Unfortunately that has been considered "planning" by our administrators for far too long.

If the county's residents want to grow by 15,000 in the next 20 years (not clear if that is even true) it is not logical to approve ASP's to accommodate many multiples of that number county wide. We are not in a boom cycle now, nor will we be for just as long, if ever. Pipedreams can be expensive! When is the Balzac waterline (the first Cross Iron one) ever going to get paid and by whom? The County has a long history of getting

hosed with default payments, flooding (Langdon, Cochrane Lake etc), off-site-levies higher for existing landowners than developers, etc, etc. Bad Planning all around complicated by now seeing things through before moving on.

Where is that Glenbow, Langdon, Balzac (west)? Now we need to approve Springbank North/South and Elbow Valley. Nothing is started but we also need gravel pits and all the other stuff to build something that isn't coming in a VERY, VERY long time. And in the meantime Calgary doesn't want to grow while we are living our field of dreams. You must be joking? Sadly, someone gets to pay for these grand mistakes. It's us. Me and You!

I want off the merry-go-round. Show the community these plans are working and also see if we like it. Slow managed growth, is much better because it affords one, to have hindsight. Please stop. There is way too much of the tail wagging the dog. On top of it the rush is not appreciated at this time. Pandemic and major recession is on the horizon. We citizens are not on an election cycle. We should be taking baby steps now and getting through difficult times and not planning for the next 200 years.

My final suggestion, even though you won't likely take it, is that administration and elected officials stop having lunch with developers. We can't afford it. Every meal cost us millions, particularly when they generously pay for the meal and do the planning with their team. That team is not on the ratepayer's side and are not accountable to us.

Sincerely,

Keith

Michelle Mitton

From: Keith Koebisch [REDACTED]
Sent: February 16, 2021 8:59 PM
To: Legislative Services Shared; Jessica Anderson
Subject: [EXTERNAL] - Application # C-8051-2020 Ref# PL2020-0031
Attachments: Summit.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

Feb. 16, 2021

Hi, Please see attachment for my letter in opposition of Mt Ash/Summit Pit Application.

Thanks,

Keith Koebisch

Keith Koebisch

271011 Range Rd. 40

Rocky View County, AB

T4C 3A2

Feb 16/2021

To: Legislative Services RVC

Ref. #C-8051-2020 PL 2020-0031



One of our Resident Cougars

Dear Councillors;

I am writing in objection to the proposed Mountain Ash/Summit gravel pit application. There are many reasons to conclude that this particular proposal would rank as the worst locations for such land use.

PROXIMITY TO PARK - The pit would come within about 800m of Big Hill Springs Provincial Park. This park is more of a Provincial Heritage Site than anything else. To me it is like a real version of what one would find at the Glenbow Museum. It is of great cultural importance to the native Indians that used the area extensively for hunting. The pioneers used the area first to gather buffalo bones. A little later it had a significant connection to the original Cochrane Ranch. The springs, which provided very cool, clean water year round, hosted the first creamery in the province and one of the first fish hatcheries. This area was significant enough to achieve "Park" status right at the beginning of the Provincial Park network.

THE SPRINGS – The spring at the Park is the largest in the coulee, which hosts many springs. Its volume, purity (only 300 TDS) and year round flow, account for some of the reasons that this spring is considered as very unique and is said to rank fourth in national importance for springs of this type. We have retained a respected hydrologist and geochemist, Dr. Jon Fennell, to review and comment on what, if any affect, the proposed gravel pit might have on the spring. His report will be presented to you, but for now let's just say that it is alarming!

TOURISM – As you may know, Big Hill Springs Provincial Park was closed for the 2020 season, in order that it may receive a \$1.2 million face lift. Apparently the park is TOO POPULAR, so much so that it needs upgrades to manage all the tourists. In 2019 there were nearly ¼ million visitations. During 2020 nearly all parks in the region had a 40% increase in use due to Covid 19. So it is pretty clear that the park, once open again, will attract far more than it had previously and might well be far and beyond the previous visitations. Does anyone in their right mind think that these people will be delighted to be choking on gravel dust and listening to crushers? None of the visitors will enjoy the truck traffic and the prospects of accidents are high, given the location of the park entrance. Peak gravel season coincides

with peak tourist season, so this is a big problem. International tourists should have something to do in Alberta, rather than going directly from YYC to Banff. What does Rocky View have to offer, other than Bass Pro and Bragg Creek Provincial Park? Mr. Kamachi wouldn't want a mega pit 800m from that park, which isn't nearly as significant historically, or environmentally, speaking.

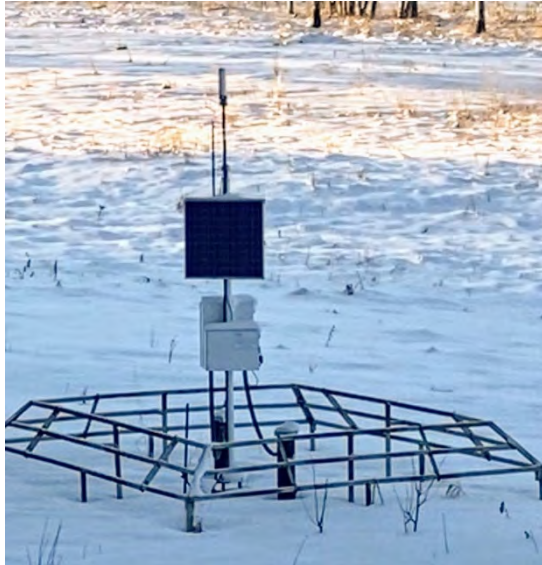
There is information that suggests that the entire coulee be afforded protection. Jo + John Hutchinsons donated 5 quarters to NCC north of #567. The smart thing would be to have a corridor from Cochrane North. It would fit nicely with Glenbow Park, the land along the Jumping Pound that I and some others donated, plus the Wineglass Ranch has been donated to another conservation project. WHERE IS ROCKY VIEW WITH PLANNING?

NIMBY – I know some of you want to write off myself and neighbours as Nimbys and activists. Forget it. We have existing pits, Hillstone and Glenbow, about a 1.5 miles away from the park. They are bad enough, given the horrible condition of Hwy 567, which isn't much more than a hard top county road. I have not written against these pits. Gravel has to come from somewhere and we put up with them, as they are the lesser evil. Ideally the County would promote small borrow pits that are earmarked to specific needs and don't last a lifetime. Spread evenly everyone shares the pain. That's called being fair.

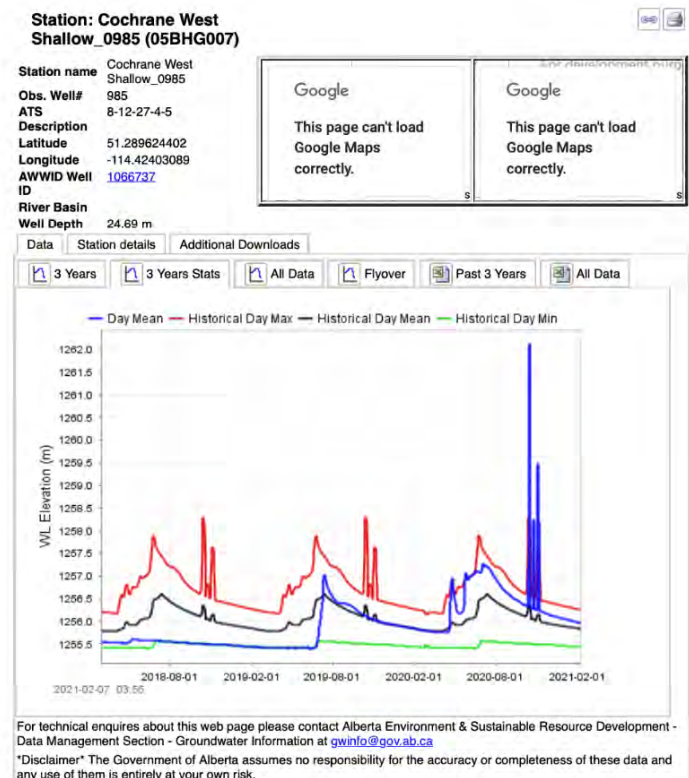
TRAFFIC – We had a Traffic Study prepared, again by a leading Alberta Expert, who has designed many large projects here and internationally. It does not take an expert to understand that this Highway is nothing to write home about. The pit intersects #567 on Range Road 40. The Range Road is FAR below the level of #567, so it has a visibility problem and you need a 4x4 to get onto it in a timely fashion in the winter. This is compounded by a few more problems: First, it is on a correction line, so the intersection is a zig-zag. Secondly, there is a slight hill just to the west of the intersection and though the highway has a double solid line, a lot of people are stupid/ignore it and pass on the right, or left, of slower traffic. It is a complicated long story of what happens next, but believe me, it is super dangerous now and accidents occur regularly. Though it is extremely rare for any vehicle to use Range Road 40 South, this is where the truck traffic for the pit would come from. Lastly pretty much all of #567 is in terrible shape. It was not made for heavy truck traffic, yet now it accommodates the existing pit, is utilized as a Calgary by-pass (unofficial "ring road") and is used by many of the commuters from Cochrane, Cochrane Lake, Water Valley etc. Major intersections along the "haul routes" exceed traffic capacity.

HYDROLOGY – As mentioned earlier, we have a detailed report explaining the significant problems this proposed pit, or others in the area, will create. I would like to add to this, with my 2 cents worth, the proposal of mining gravel to within 1 m of the water table. What level is that exactly? Am I to believe they know what level that should be with their holes in the ground and touting they got all the facts? I have smelled trouble from this industry for some time, so I allowed the Province to put two Ground Water observation wells on my property (See photo and graph). First, the applicant never even looked at this VERY reliable source of data, or overlooked it intentionally. Remember I only live a mile from the proposed mine site. What we see is that in the last 3 years the water table has nearly 4 m of change. The big change was this spring and I tell you it was not a big flood event, compared to other years. I know, because I farm and have a reliable rain gauge I look at every day. One year, I think it was 2004, we got 39 inches just the month of July.

Just the odd bad year of heavy rain, something that might happen more often with climate change, will have disastrous impacts on the pit. They don't want you to consider that. They want the money and don't give a crap about what happens, as long as they aren't on the hook. Operators like this come and go and leave communities with big bills and a mess. The environment is the least of their concerns.



Our Ground Water Observation Well



Our 2018-21 Water Table – Green: historical/ blue: observed

CUMULATIVE EFFECTS – The applicant's consultants figured that is unnecessary to address the cumulative effects, but would look them, if and when they may arise. **THEY MUST BE JOKING.** So there is an existing pit 800m from them and they didn't notice it? The one proposal for this new quarter section is additional to their first quarter, making it something "EXTRA". They wish to confuse issues by mixing and combining MSDP's. Interestingly they thought this whole issue of cumulative effects is "no big deal", as if they knew what the new County Plan will contain. To me they are putting the cart before the horse and are snubbing their noses at the Court of Queen's Bench Ruling that they, together with the County, LOST.

DUST & NOISE – I live a mile to the north. The prevailing wind direction favours me, except for about a month in early fall when we tend to have south winds. I indeed feel sorry for the poor folks that live downwind and the people that would like to visit the only tourist attraction we have nearby, BHSP. I live 1.5 miles NW of the existing Hillstone Pit and there is a sizable forest between us as well, yet the noise and dust it emits is often very noticeable - bad enough that the crusher and the beeping reversal indicator can be easily heard indoors. That's something nobody should have to put up with, considering we live here, because we don't want city noises. I take howling coyotes, the odd distant motorcycle, or a gunshot any day over crushers and beeping.

SPECIES AT RISK (Leaving the most important concern for last) – Had the consultant done the slightest amount of research, or literature, review, they would have discovered that the area is home to several Species at Risk, including some covered under endangered species legislation.

It is pretty obvious, not unlike the government ground water wells, that the Provincial Park (one of the first to be established) would have an inventory of biota in the area. One would also ask neighbours and, in particular, ones that do not want a gravel cash cow.

Many of these flora and fauna can be found in the Ecological Land Classification of Big Hills Springs Provincial Park, Alberta.

Species of special Concern – Western Blue Flag, Logger Headed Shrike, Long Billed Curlew, Long Toed Salamander, Prairie Falcon and Golden Eagle.

Threatened Species – Grizzly Bear, Peregrine Falcon and Northern Leopard frog

Endangered Species – Bull Trout and Piping Plover

Note: Bull Trout is classified as an Endangered Fish under Alberta Wildlife Act.

Dept. of Fisheries and Oceans protects this threatened Fish and its habitat under Fisheries Act.

You may want to consider what our Hydrology Study has to say. You may also wish to think twice about bulldozing the half dozen wetlands on the mine site and buy “wetland credits”. Shame, Shame, Shame. We intend to push this issue as far as needed. The good people of Rocky View and Alberta don't like the idea of disrupting above mentioned species, some of which are symbolic of Alberta itself.

Respectfully Submitted,

Keith Koebisch

Hi,

My name is Brandi Edge and I live at 271170 Range Road 40. This is the north end of RR 40 off of 567. I have been watching the Grizzly move through my place for three years now. The sow originally came through 2019. The pictures I have attached are of one of her 2 first cubs, who came through as yearlings in May 2020. I have heard that she had twins again this year. She is still traveling in this area, as we all keep tabs. This is a natural corridor to the Big Hill Springs coulee for elk, moose, cats, and bears.

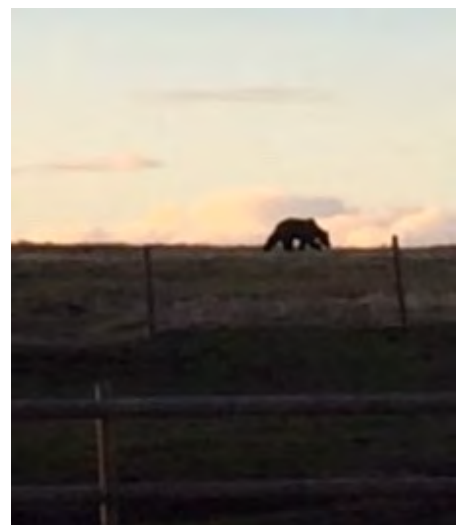
Thank you,
Brandi Edge

The Feed Store:

41070 Cook Rd. Bay 7
Rocky View County, Ab
T4C 3A2, Tel. [REDACTED]

Mailing Address:

[REDACTED]



12 July 2020

Linda and Morley Kostecky
Box 7 Site 7 RR 2
Cochrane, AB T4C 1A2



Attn: Rocky View County Council Members

Application Number: PL2020031/34 File Number: 06731002/1004

We are writing to express our opposition to this application for land re-designation.

We have owned and operated 20 acres on SW32-26-3W5 (located 800m east of the applicant property) for the past 27 years. We chose this property because of the inherent beauty of the surrounding landscape, the abundant wildlife (drawn to nearby Big Hill Springs Provincial Park), and the agricultural lifestyle of the area. Our home is approx. 1km south of Hwy 567 – far enough that we hear very little highway noise - and because Range Road 35 is a dead-end road just 1.6 long, we have a very quiet, private location.

Since we purchased the property, we have poured “blood, sweat and tears” into improving the house and land, and we have become deeply vested in the neighboring community. It has been an outstanding location to raise our sons and run a small farming operation. However, we feel quite certain that our enjoyment in living here will be seriously curtailed if this application is approved. A re-designation of this neighboring land as Direct Control District (for yet another gravel operation) will make our property much less desirable as “country residential” if we eventually wish to sell.

The applicant property is approximately 800m directly west of our house and in clear line of sight. The strong prevailing west winds make it *impossible* to control the dust from a gravel operation. Despite the “best efforts” of the operators of the Hillstone pit (located 3.2km west) and the Glendale Road pit (located ~1.5km southeast), it is not unusual for us to see huge plumes of dust rising from their locations. To illustrate, the first three attached photos were taken from our east deck showing the dust plume from the Glendale Road pit. The fourth photo shows just one of several dust plumes from the Hillstone pit, and with each expansion of that pit we notice a significant increase in the dust in our air, and on our windows, house and yard. These events indicate to us that either the operators do not follow the dust control requirements set by the province, or the operators do follow the requirements but the requirements are not sufficient to protect surrounding landowners. Either way, we are left affected by fugitive emissions from their operations. If these current pit operators are unable to prevent such dust releases, how can we reasonably expect the Summit operation to be any different? We are very apprehensive that a gravel operation located *less than a kilometer away and directly upwind* will make it impossible for us to spend quality time outdoors and also make our indoor living space less safe.

The noise from the operation of large equipment at the applicant site would be seriously noxious after so many years of the peace and quiet that we love. We spend time outside every day working with our sheep and enjoying the natural environment around us. It is very hard to imagine (and it's completely unacceptable) that we would be unable to enjoy outdoor peace and quiet except on weekends when the gravel machinery would not be operating. The portion of the pit directly west of us is also some 20m lower than our land – so their proposed sound berms will provide virtually no sound attenuation in our yard.

The impact of adding dozens of gravel trucks per day on Hwy 567 is also a major concern for us. We must travel east on that road to work in Calgary, and west to shop in Cochrane. It is well known that the highway is extremely busy (and moderately dangerous), particularly in the summer when long lines of motor homes and holiday trailers struggle to maintain speed up and down the coulee at the entrance to Big Hill Springs Provincial Park. Travelling west on Hwy 567 past the entrance to the park, the highway crests a hill, then descends into a short but significant “dip”, then rises again to the flatlands beyond. Our access road (Range Road 35) is a left-hand turn at the bottom of that “dip”. When a large vehicle has difficulty maintaining speed coming up (west) out of the coulee, a long line of vehicles often forms behind it. As they crest the hill, impatient drivers accelerate to pass while going through the dip. We have had many narrow escapes as we also have our left turn signal on...but we are actually slowing and braking to make the turn onto our access road. If this proposed gravel operation is allowed to proceed, this exact scenario will be repeated further west as trucks attempt to make a left turn onto the Summit property. This will only exacerbate the reckless behaviour of impatient drivers and make it even more dangerous for local residents going about our daily business. The transportation infrastructure is simply not in place to accommodate another gravel operation in the area. We strongly disagree with the applicant's comment that Highway 567 is “ideally suited” for more heavy truck traffic.

Finally, we are very frustrated that this application is proceeding before the appeal to the Court of Queen's Bench (Docket 1701- 12053) has been resolved, and with no County Aggregate Policy in place. Despite our intention to oppose this application, we are unable to be certain that we have done so effectively – since no one knows what the “rules” are in this process. It is illogical to evaluate these aggregate extraction proposals as discreet entities using a Code of Practice that does not address the cumulative effects of the “gravel mall” that seems to be emerging in our area. A 24hr call center will not be helpful to us when it will be impossible to identify which operator is at fault for an offensive issue.

In summary, we are requesting that Rocky View County deny this application for re-designation. This proposal would have a devastating impact on the use and enjoyment of our property. We have worked hard to contribute to the community life of Rocky View County for the past 27 years – we now ask Rocky View County to allow us to continue to do so for many years to come.

Sincerely,

Linda and Morley Kostecky

1 June 2017 7:20am Glendale Pit dust



1June2 2017 10:50am Glendale Pit dust



1June2017 1:25pm Glendale Pit dust



20June 2017 Hillstone dust



Calvin C. and Kim M. Rawn
C.K.R. Farms Ltd.
35095 Big Hill Springs Road
Rocky View, AB T4C 1A2

July 12, 2020

Rocky View County
Jessica Anderson
janderson@rockyview.ca
26075 Rocky View Point
Rocky View County, AB T4A 0X2

File Number: 06731002/1004
Application Number: PL20200031/34
Division 9

Attention Jessica Anderson:

We are the current landowners of NE-31-26-03-W05M which is located directly east of the subject land in the application.

Due to our close proximity to the applicant some issues have come to light. We have brought these concerns to their attention and we are hoping to reach an amicable solution on our own. Unfortunately, **we cannot support this application until the concerns are addressed.**

We would also like to bring a major area of our concern to your attention, this would be outside of the scope of their responsibilities. With the approval of this application, and other applications in our immediate area, a high concentration of traffic will become an issue for us. 90% of the truck traffic from the Summit Pit will proceed east on highway 567 directly past our driveway. And we imagine 90% of the truck traffic from the Lafarge and McNair Pits will also head this direction. Highway 567 is already a major safety concern as it is a very busy thoroughfare. **This is one more reason we cannot support this application at this point in time.** We are not opposed to future development but feel this cannot be done without major safety improvements made to Highway 567 prior to these pits becoming operational.

Yours truly,

Calvin C. Rawn

[REDACTED]

[REDACTED]

Rocky View Council
262075 Rocky View Point
ROCKY VIEW COUNTY
Alberta, T4A 0X2

8 February 2021



148 – Gleneagles View
COCHRANE, T4C 1W1
Alberta

Dear Rocky View Council,

Summit Mine – Mountain Ash Limited Partnership
Application PL 2020031
OPEN PIT GRAVEL MINE
By-Law C-8051-2020

I wish to indicate by strong disapproval of the proposed open-pit Gravel Mine as noted above. The SUMMIT PIT is one of several open-pit Gravel operations proposed near Bighill Springs Provincial Park, the upper watershed of the Bighill Springs Creek and, importantly, the known aquifer of these Nationally significant Bighill Springs. The Springs provide constant year-round flows of clear cool water to the creek, are the proven basis for a healthy valley and watershed down-stream to the Bow River in Cochrane and are the basis for our hugely popular Bighill Springs Provincial Park.

The gravel mines would remove protective over-layers of the subterranean aquifer of the Springs and would certainly adversely threaten the water flow to the Springs.

The gravel pit application by Mountain Ash Limited Partnership illustrates its irresponsible environmental concerns. This disregard for the Springs and area has to be vigorously challenged and certainly declined. With the huge presence and proliferation of gravel pits around Cochrane, it is unbelievable that the Mountain Ash Group (and likely others) would focus on the highly sensitive area of the Bighill Creek Watershed and the Bighill Springs/Aquifer.

A 'mis-judgement' by the Mountain Ash Group coupled with an approval by our Rocky View Council would be a National environmental calamity.

I sincerely hope that his Mountain Ash Gravel application for Summit Mine (and others likely to be proposed nearby) will be soundly rejected.

Yours sincerely,

A handwritten signature in blue ink that reads "Kenneth J. Stevenson".

Kenneth J. Stevenson, Ph.D.
Professor Emeritus of Biochemistry, Department of Biological Science,
Faculty of Science, University of Calgary

Rocky View County
262075 Rocky View Point
Rocky View County AB
T4A 0X2
Nov 16, 2020

VIA EMAIL

RE: Bylaw C-8051-2020
Land Use Bylaw C-8000-2020
Division 9

To: Municipal Clerk:

I am writing once again in **strong opposition** to the above captioned proposed redesignation from Agricultural, General District to Direct Control District to facilitate the **creation** of a gravel aggregate extraction operations for reasons stipulated below. It should be noted that this is my third letter of opposition to this proposal, the first being issued in 2018.

I am a long-term Rocky View County resident (35+ years) residing on the NW30T26R3W5M located 1.5 miles south of the location in question on rising terrain that sits approximately 100 ft. above the subject sites. I am currently impacted by two existing gravel extraction operations, one located east of Big Hill Springs Provincial Park, the other located 1/2 mile west of Range Road 40 immediately south of Highway 567. I oppose the 1410266 Alberta Ltd. application as it relates to noise, airborne particulate matter, highway traffic impact, property devaluation, and cumulate effect of multiple existing gravel pit operations on myself, my family, and existing rate payers in this part of Rocky View County.

I am asking Council to view this and future similar applications through the eyes of the residents that will bear the impact. I seriously doubt that anyone would argue that there will be no impact; the question then becomes what is reasonable given the current impact of existing operations? Multiple gravel pit operations in a relatively small area is all about individual company competitive edge, and not about the lack of current aggregate supply. I understand that Rocky View County wants to reflect an "Open for Business" philosophy, however in some cases such as this, the very premise of the rural agricultural lifestyle that comprises the vast majority of land within the County, is severely compromised. I would not have moved my family to Rocky View many years ago and contributed to the tax base for this time, had I known that this location would end up as a mining operation. It is my belief that Open for Business can still be accomplished by limiting gravel operations, and not just trying to govern them case by case with the MDP. If we do not say no at this juncture, we will never be able to say no, thus opening up the ground to everyone with a site development plan and a shovel. Is the intent that Rocky View County become the gravel mining supplier to the City of Calgary and the Town of Cochrane? Do the profits of gravel companies outweigh the rural lifestyle and property values of **longtime** rate payers? I ask, who profits, who loses, and who cares?

I suggest that our elected Councilors are obligated to not only look at the big picture, but also the smaller picture as well. Do the right thing for the right reasons, with the understanding that the existing gravel operations are sufficient to satisfy the demands for aggregate in the medium term. Limit gravel operations to minimize the **cumulative** impact of multiple open pit mining operations to residents and remain "Open for the **BEST** Business".

Thank you in advance for your consideration of my views.



Larry Stock
264160 Range Road 40
Rocky View County AB



Rocky View County
262075 Rocky View Point
Rocky View County AB
T4A 0X2
July 02, 2020

VIA EMAIL

RE: Application File Number: 06731002/1004
Application Number: PL20200031/34
Division 9

To: Jessica Anderson:

I am writing once again in **strong opposition** to the above captioned proposed redesignation from Ranch and Farm district to Natural Resource Industrial District to facilitate the **creation** of a gravel aggregate extraction operations for reasons stipulated below. It should be noted that this is my second letter of opposition to this proposal, the first being issued in 2018.

I am a long-term Rocky View County resident (35+ years) residing on the NW30T26R3W5M located 1.5 miles south of the location in question on rising terrain that sits approximately 100 ft. above the subject sites. I am currently impacted by two existing gravel extraction operations, one located east of Big Hill Springs Provincial Park, the other located 1/2 mile west of Range Road 40 immediately south of Highway 567. I oppose the 1410266 Alberta Ltd. application as it relates to noise, airborne particulate matter, highway traffic impact, property devaluation, and cumulate effect of multiple existing gravel pit operations on myself, my family, and existing rate payers in this part of Rocky View County.

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Thank you in advance for your consideration of my views.



Larry Stock
264160 Range Road 40
Rocky View County



July 9, 2020

Rockyview County
262075 Rocky View Point
Rocky View County, AB
T4A 0X2

RE: Mountain Ash Limited Partnership's Application PL20200031-4 -- LETTER OF SUPPORT

To Whom It May Concern:

This is a letter expressing Boothby Ranches Ltd. SUPPORT of the application for land use re-designation by Mountain Ash LP for the Summit Pit (PL20200031-4). We believe the responsible extraction of gravel in accordance with municipal and provincial regulations currently in place should be permitted to develop as local markets demand; both to reduce mileage of haul routes and to offer competitive aggregate prices to the citizens of Division 9.

Sincerely,

Dana Boothby
President

Boothby Ranches Ltd.
#3 Montenaro Bay
Cochrane, AB
T4C 0A5

Buckley Ranch Aggregate Development Inc.

July 8, 2020

Rocky View County
Planning Services Department
262075 Rocky View Point
Rocky View County, AB
T4A 0X2

Attention: Jessica Anderson – Municipal Planner (via email at janderson@rockyview.ca)

Re: MALP Application for the Summit Pit - PL20200031-4 Redesignation and MSDP

Ms. Anderson:

Buckley Ranch Aggregate Development Inc. (BRADI) is the owner of SE 1-27-4-W5M, which is in close proximity to the subject lands at NW 31-36-3 W5M and SW 31-26-3 W5M.

This application by Mountain Ash Limited Partnership (MALP) is consistent with the expectations of BRADI, that all pits (existing and proposed) maintain and be held to the same standards in their applications, approvals, and subsequent development and operations activities. Therefore, BRADI has no objections and supports these applications for land use redesignation and MSDP approval by Rocky View County.

Regards,



Michael Buckley

President

Buckley Ranch Aggregate Development Inc.

Michelle Mitton

From: Clint Giles [REDACTED]
Sent: Sunday, February 14, 2021 3:39 PM
To: Legislative Services Shared
Cc: Tige Brady
Subject: [EXTERNAL] - BYLAW C - 8051-2020
Attachments: Gravel Pit Support Letter.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Do not open links or attachments unless sender and content are known.

To Whom It May Concern,
Please see the attached letter in regard to the above subject.

Thank you,
Clint Giles

Feb. 14, 2021

BYLAW C-8051-2020

To Whom it May Concern,

My name is Clint Giles of Circle J Ranches Ltd, we farm north of 567 and our land reaches down to NW 6 - 27 - 3W5. I am writing this letter to show my support of the proposed aggregate operation.

My family has farmed in this location for four generations, we have seen many changes and growth in the area. We have never opposed any acreage development or oil and gas development or commercial development.

When you live next to a city the size of Calgary, we have always thought you have to expect changes.


We have operating gravel pits in the area already and gravel is necessary for growth. It is good for the County's tax base.

Years ago, there was gravel pit on the intersection of 567 and Range Road 34 which has been reclaimed and only the older residents, like my family knew it was there.

So in closing I am in full support for the development of the aggregate operation in question. I have been in close contact with Tige Brady and Carol and Bruce Waterman and I am confident that things will be done properly.

Sincerely,



Clint Giles (for Circle J Ranches Ltd.)


Dear Jessica,

My name is Clint Giles and own and farm land north of the proposed Summit Pit located at NW Section 6-27-3-W5. I have been in contact with Tige Brady, Client Representative for Mountain Ash Limited Partnership, namely Bruce and Carol Waterman whom are the owners of the proposed Summit Pit located on the west half of Section 36, Township 26, Range 3, west of the 5th meridian. I am writing this email in support of the above mentioned application.

I have had several conversations with Tige regarding this project over the last few years. The most recent application and previous applications, as presented and discussed with me, represents a holistic and responsible approach to gravel extraction in the area. MALP has made commitments with in their application to mitigate the impacts on my property both socially and environmentally. Some of these mitigative measures include, continuous 24hr noise and dust monitoring, sight and sound berm along highway 567 with landscaping, paving a portion of Range Road 40 and upgrading the intersection at RR40 and highway 567 to a Type IV intersection; most importantly an honest commitment to engage the community on an ongoing basis to ensure adverse impacts are being addressed in a timely and appropriate manner.

Regards,



Clint Giles
Circle J Ranches Ltd.

RE: Support Letter
MALP Land Use and MSDP Application – PL20200031-4

Dear Jessica,

My name is Bill Hartman and I live north of the proposed Summit Pit; My location is section 6, (160 acres SE/4 and 60 acres NE/4) of Section 6, Township 27, Range 3, west of the 5th meridian. I have been in contact with Tige Brady, Client Representative for Mountain Ash Limited Partnership, namely Bruce and Carol Waterman whom are the owners of the proposed Summit Pit located on the west half of Section 36, Township 26, Range 3, west of the 5th meridian. I am writing this email in support of the above mentioned application.

I have had several conversations with Tige regarding this project over the last several years. The most recent application and previous applications, as presented and discussed with me, represents a holistic and responsible approach to gravel extraction in the area. MALP has made commitments with in their application to mitigate the impacts on my property both socially and environmentally. Some of these mitigative measures include, continuous 24hr noise and dust monitoring, sight and sound berm along highway 567 with landscaping, paving a portion of Range Road 40 and upgrading the intersection at RR40 and highway 567 to a Type IV intersection; most importantly an honest commitment to engage the community on an ongoing basis to ensure adverse impacts are being addressed in a timely and appropriate manner.

Regards,


Bill Hartman
July 26/2020



July 10, 2020

Rocky View County
Planning Services Department
262075 Rocky View Point Rocky View County, AB T4A 0X2

Attention: Jessica Anderson, Municipal Planner

Re: Re-designation and MSDP Application - PL20200031-4 (File 06731002/1004)

Lafarge Canada Inc. is the owner of NE 36-26-4 W5M, which is directly west to the subject lands located at NW 31-36-3 W5M and SW 31-26-3 W5M. MALP has shown a great effort and commitment to work with adjacent landowners and gravel operators to mitigate and address and cumulative effects of their proposed operations. Lafarge has no objections and supports MALP's application for land use re-designation and MSDP approval by Rocky View County.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J Weslowski', is written over the typed name.

Jennifer Weslowski

Land Manager, GCA & WCAN Cement

Volker Stevin Highways Ltd.



July 10, 2020

By EMAIL:

Rocky View County – Planning Services
Attn: Jessica Anderson (janderson@rockyview.ca)

RE: Mountain Ash Limited Partnership MSDP Application PL20200031-4

Dear Ms. Anderson,

We understand Mountain Ash Limited Partnership (“MALP”) has applied for approval of their Master Site Development Plan “The Summit Pit” (application PL20200031-4). Volker Stevin Highways Ltd (“VSH”) is currently in the process with Rocky View County to subdivide and subsequently develop a 10-acre parcel off RR40 adjacent to the proposed development of The Summit Pit.

This letter is to confirm to Rocky View County that VSH supports this application, provided that at the time a Development Permit is issued for Phase 4 and 5 (and RR40 is temporarily closed) MALP provides and maintains a temporary all weather access road to our Highway Maintenance Yard to ensure our operations are not negatively impacted.

To this end we would suggest Section 27 of the MSDP document to include a policy statement reflecting a commitment to provide alternate access to adjacent lands whenever mining of the statutory road allowance proceeds. There is currently no mention of alternate access; Section 27 only speaks to reconstructing the road post extraction.

We would like to mention we have had several constructive conversations with MALP in which they confirmed their willingness to accommodate such a temporary access road.

Please contact me directly if you have any questions.

Best regards,

Marcel Rijkens
General Manager

7175 - 12th Street SE, Calgary, AB T2H 2S6
Reception: 403-571-5800
Fax: 403-571-5875

24 HOUR EMERGENCY LINE: 1-888-VS-ROADS (1-888-877-6237)



FS 701298



Main Floor, 155 Glendeer Circle SE
PO Box 1480, Station T
Calgary, Alberta T2H 2P9

www.tricyclelane.com

Tel 403.640.9355

July 13, 2020

DELIVERED VIA EMAIL

Rocky View County
262075 Rocky View Point
Rocky View County, AB, T4A 0X2

Attention: Jessica Anderson, Planning Services Department

Dear Ms. Anderson:

Re: File 06731002/1004 Application PL20200031/34

As the owner of the neighboring parcels: SE31-26-3W5, NE30-26-3W5, and SW32-26-3W5; Tricycle Lane Ranches Ltd. supports the Master Site Development Plan and redesignation from Ranch and Farm District to Natural Resource Industrial District of the subject lands in applications PL20200031/34.

Responsible aggregate resource extraction should be encouraged in this area to avoid sterilization of a valuable natural resource.

Sincerely,

Tricycle Lane Ranches Ltd.

A handwritten signature in blue ink, appearing to read "S. Burns", with a long horizontal flourish extending to the right.

For - Scott Burns CEO

SMB:US

Volker Stevin Highways Ltd.



February 9, 2021

By EMAIL:

Rocky View County – Planning Services
Attn: Jessica Anderson (janderson@rockyview.ca)

**RE: Mountain Ash Limited Partnership MSDP Application and Land use re-designation
(PL20200031-4)**

Dear Ms. Anderson,

We understand Mountain Ash Limited Partnership ("MALP") has applied for approval of their Master Site Development Plan "The Summit Pit" as well as land-use redesignation (application PL20200031-4). Volker Stevin Highways Ltd ("VSH") has recently acquired a 10-acre parcel off RR40 adjacent to the proposed development of The Summit Pit.

This letter is to re-confirm to Rocky View County that VSH supports this application subject to the condition if at any point in time mining under the statutory road allowance is approved VSH would require alternate access to its property. In our letter dated July 7 we pointed out there was no mention of temporary alternate access for adjacent landowners in the MDSP; Section 27 only speaks to reconstructing the road post extraction.

We would like to mention we have had several constructive conversations with MALP in which they confirmed their willingness to accommodate such a temporary access road.

Please contact me directly if you have any questions.

Best regards,

Marcel Rijkens
General Manager

7175 - 12th Street SE, Calgary, AB T2H 2S6
Reception: 403-571-5800
Fax: 403-571-5875

24 HOUR EMERGENCY LINE: 1-888-VS-ROADS (1-888-877-6237)



FS 701298

PLANNING AND DEVELOPMENT SERVICES

TO: Council
DATE: March 2, 2021 **DIVISION:** 9
FILE: 06731002/4 **APPLICATION:** PL20200034
SUBJECT: Master Site Development Plan – Summit Pit
Note: This application should be considered in conjunction with land use application PL20200031 (agenda item E-1).

APPLICATION: To adopt a new Master Site Development Plan to replace the existing approved Summit Pit MSDP to provide a policy framework to guide and evaluate the development of an aggregate facility within the site.

GENERAL LOCATION: Located at the southeast junction of Hwy. 567 and Rge Rd 40, approximately 5 km northeast of the town of Cochrane.

LAND USE DESIGNATION: Agricultural, General District

EXECUTIVE SUMMARY: The application is consistent with the relevant policies of the County Plan and the Land Use Bylaw:

- A redesignation application (PL20200031) was submitted to redesignate the subject lands from Agricultural, General District to Direct Control District. In accordance with the policies of the County Plan, a Master Site Development Plan (MSDP) has been submitted with the redesignation application.
- The submitted MSDP sufficiently demonstrates that impacts associated with the proposed aggregate development can be controlled to an acceptable level in accordance with existing operating standards established by the County and provincial government.
- All technical concerns, including consideration of the cumulative effects of several aggregate sites operating in close proximity to one another, have been addressed.

ADMINISTRATION RECOMMENDATION: Administration recommends approval in accordance with Option #1.

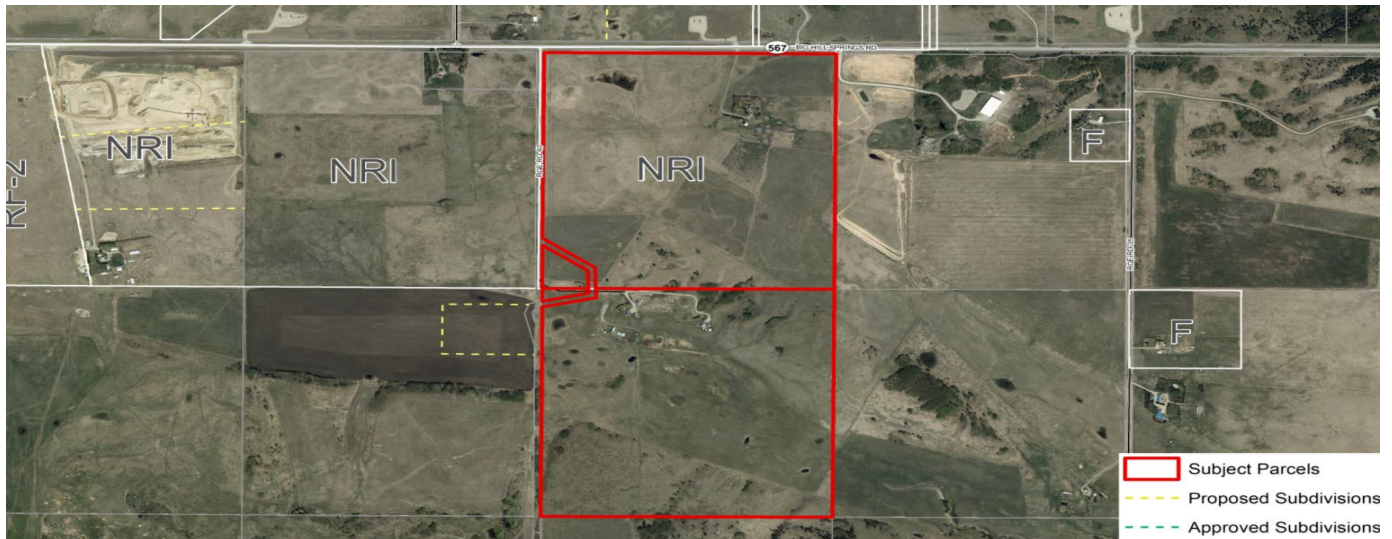
OPTIONS:

- OPTION #1: THAT the Summit Pit Master Site Development Plan (approved April 24, 2018) be rescinded.
THAT the Summit Pit Master Site Development Plan be approved as per Attachment 'C'.
- OPTION #2: THAT application PL20200034 be refused.

Administration Resources

Jessica Anderson, Planning and Development Services

AIR PHOTO & DEVELOPMENT CONTEXT:



APPLICATION EVALUATION:

The application was evaluated based on the technical reports submitted with the application and the applicable policies and regulations.

APPLICABLE POLICY AND REGULATIONS:	TECHNICAL REPORTS SUBMITTED:
<ul style="list-style-type: none"> • <i>Municipal Government Act;</i> • Municipal Development Plan; • Land Use Bylaw; and • County Servicing Standards. 	<ul style="list-style-type: none"> • Air Quality Assessment, prepared by SLR Consulting (Canada) Ltd. dated May 21, 2020 • Acoustic Assessment Report prepared by SLR Consulting (Canada) Ltd. dated May 21, 2020 • Hydrogeological Assessment Report prepared by SLR Consulting (Canada) Ltd. dated January 14, 2020 • Summit Aggregate Pit TIA update prepared by Watt Consulting Group dated March 10, 2020 • Conceptual Stormwater Management Report prepared by SLR Global Environmental Solutions dated January 2020 • Biophysical Impact Assessment (BIA) prepared by SLR Global Environmental Solutions dated January 2020 • Wetland Assessment and Impact Report prepared by SLR global environmental solutions dated February 2020

POLICY ANALYSIS:

This report focuses primarily on the technical aspects of the proposal, including all development related considerations, while the report to consider the associated land use application (PL20200031) focuses on the compatibility with the relevant statutory plans.

MASTER SITE DEVELOPMENT PLAN OVERVIEW:

As directed by the County Plan, the MSDP provides for a comprehensive overview of the proposed development addressing matters such as noise, air quality, stormwater, groundwater, visual and landscape impacts, reclamation and traffic impacts.

Overview

The proposed Summit operation is located along Highway 567 northeast of the Town of Cochrane at NW/SW-1/4-31-26-3-W5M and is 322 acres in size. The lands are currently undeveloped, and access is provided by way of an existing approach from Highway 567 and Range Road 40. The lands are located in an area of the County that is primarily agricultural in nature; however, there is an existing gravel operation less than ½ mile to the west.

The subject site is in an area with a mix of land uses including farming, farmsteads and a mix of non-residential land uses such as other aggregate pits, oil and gas wells, and commercial development to the north and west.

On-site operations would include the stripping of topsoil and overburden materials and the mining of the underlying sand and gravel. The sand and gravel would be crushed and screened on-site and shipped to markets around Balzac, the Calgary International Airport, and north Calgary growth areas. Washing is not planned for the site. Reclamation of the pit would be phased and would follow closely behind mining operations, with a maximum of 40 acres open at any one time. The site would be returned to agricultural uses upon completion.

The Applicant anticipates a 30 to 40 year operating period.

Existing Conditions

The subject site consists of an undivided quarter section with an existing road allowance in the southwest corner of the site and the adjacent undivided quarter section to the south. The lands are bound by Highway 567 to the north, Big Hill Springs Gravel Pit and farmland to the west, a large coulée and agricultural lands to the south, and another farmstead and equestrian business located to the east.

The topography in the project area is undulating, with elevations ranging from 1288.0 m to 1295.0 m. The high point is located in the upper northeast portions of the subject lands. The subject lands slope towards the south and east. The majority of the northern portion of the site is relatively flat with a slight southwest facing aspect.

Biophysical Impact Assessment

Summit undertook a Biophysical Impact Assessment that identified a number of wetlands and an undisturbed natural area. The area does not contain any rare plants, plant communities, or sensitive soils that would be negatively impacted by the proposed aggregate operations. Activities that may affect wetlands are subject to the Alberta Environment and Parks Water Act and Alberta Wetland Policy.

The County's GIS mapping system indicates that there is a tributary of the Big Hill Springs Creek within the south portion of the subject lands; however, the BIA indicated that there are no watercourses within the project development area. The BIA reviewed data from 1950 to current conditions; the historic air photos do identify an ephemeral drainage that has been cultivated through, but there are no other drainages or associated riparian areas. Based on this information, the area identified as Undisturbed Natural Area within the phasing plan would provide adequate protection for the identified natural areas.

Development Concept

A Development Permit would be required prior to the commencement of each phase. Mining operations would commence in Phase 1 along the east property line of the subject lands and proceed from there as shown in the phasing plan.

In Phase 1, sight and sound berms would be constructed along the east boundary to ensure operations are not visible from adjacent lands and off-site transportation improvements would be in place. Dust control, sediment/erosion control, and weed management control practices would be implemented during stripping and stockpiling. Setbacks would be maintained in accordance with the Land Use Bylaw provisions.

Groundwater

A Hydrogeological Impact Assessment was undertaken and concludes that the proposed aggregate extraction would not pose any significant or adverse impacts to the existing confined or unconfined groundwater aquifers, or the Big Hills Springs tributary as it pertains to water volume or water quality because aggregate resource would not be mined into the water table. The report therefore anticipated no changes to the groundwater flow system.

To ensure that there are no negative effects on the groundwater, Summit is proposing to excavate to a depth of 1.0 m above the groundwater depth. The site would be developed as a dry pit. At the Development Permit stage, the Applicant would be required to submit new groundwater readings within the boundaries of the proposed phase of the pit demonstrating that groundwater levels are below the proposed pit bottom. In addition, a two year groundwater monitoring program has been undertaken and Summit commits to additional monitoring on a quarterly bases for the life of the project.

Stormwater Management

A Conceptual Stormwater Management Plan was submitted in support of this MSDP to demonstrate how rainfall & surface runoff within the proposed aggregate operation would be managed throughout the course of development. The strategy ensures that rainfall runoff is managed effectively onsite to prevent flooding downstream, to prevent pollution of the underlying aquifer or surface water bodies, to provide a gravity system that does not require active pumping, to separately manage runoff from undisturbed areas (clean runoff) whenever possible, and to ensure operations are not affected by stormwater runoff. Stormwater would be conveyed and collected through various onsite swales and ponds. Stormwater is then proposed to be released back to the environment through numerous groundwater recharge wells. The Applicant is aware that water shall not be released or conveyed to any existing wetlands without the written approval of Alberta Environment and Sustainable Resource Development (AESRD) and shall meet all water quality standards. It is to be noted that the applicant is not proposing to wash aggregate on site as part of their proposal.

Sedimentation and erosion control plans would be prepared at the Development Permit Stage.

Access

Access to the site would be from Provincial Highway 567 on Range Road 40 approximately 200m south of the intersection. This access would be paved as part of Phase 1 to reduce dust as well as dirt leaving the site.

A Traffic Impact Assessment (TIA) was commissioned to study the effects of the Summit development on local traffic. The findings of this report indicate that a Type IIa intersection is required for Phase 1 with a Type IVa being required at the 20 year time horizon. Alberta Transportation has reviewed the TIA and agrees that at Type IVa intersection would be warranted to accommodate the proposed operations. Summit intends to construct a Type IVa intersection at Phase 1 at the DP stage.

Although there is only one (1) existing aggregate operation along Highway 567 in the Big Hill Springs area, there could be as many as four (4) aggregate operations operating in close proximity to each other, should pits that are still in early planning stages receive land use redesignation approval.

Alberta Transportation has agreed to allow Range Road 40 and Highway 567 to be used for Summit Aggregate trucking.

Reclamation

Reclamation would be ongoing and continuous throughout the life of the project to maximize the amount of land under agricultural production during pit operations. The size of open areas being used for operations or un-reclaimed would be limited to 40 acres at any one time. The objective of the final reclamation plan is to return the land to an equivalent agricultural land capability after mining operations are complete. Weed management during and post reclamation would be in accordance with Land Use Bylaw and the Weed Control Act.

Offsite Impacts

Hours of operation are proposed to be from 7:00 a.m. to 7:00 p.m. on Monday through Friday, 7:00 a.m. to 5:00 p.m. with no crushing on Saturday, and no pit activity on Sunday or Statutory Holidays. Generally, operations on site would be seasonal in nature with limited operations between November and March.

Typical extraction and aggregate production operations at full pit development would include the operation of one portable crusher, one loader, one bulldozer, and three scrapers during stripping and reclamation/grading phases of development.

Water and sanitary servicing would be supplied by portable water and sanitary facilities. Garbage facilities would be provided onsite and removed on a weekly basis.

The preferred method of dust control for this site is the application of calcium chloride to gravel roads due to its ease of application, low cost, and dust reduction effectiveness.

Air Quality

The applicant provided an Air Quality Assessment. The assessment modelled the projected emissions to be generated by the proposed mining operation in accordance with AESRD guidelines. The assessment concludes that the proposed mining operation is not expected to exceed air quality objectives beyond the subject lands, and would have minimal impact to nearby residences. It is to be noted that this study did not take into consideration the other proposed gravel operations nearby the subject lands and could affect the findings of this report. At the Development Permit stage, the Applicant would be required to provide an updated Air Quality Assessment, taking into consideration any active new developments (neighboring gravel operations) in the vicinity of the site.

Noise

SLR Consulting was retained by Summit to conduct an Acoustic Assessment at the proposed location. SLR examined the noise impacts of proposed operations on the closest six (6) dwellings to the subject site.

Currently, there are no standardized methods for conducting aggregate operation noise measurements in the County. The County regulates noise through the Noise Control Bylaw No. C-5772-2003. The Bylaw states that no person shall "make, continue, cause, or allow to be made or continued any excessive, unnecessary, or unusual noise of any type" and that noise must be "minimized as much as practicable." This Bylaw does not prescribe quantitative limits for noise emissions.

Summit proposes to use the lowest maximum allowable sound levels as defined by any of the Alberta Energy Regulator (AER) Directive 038, City of Calgary and City of Edmonton Bylaws. AER Directive 038 imposes noise limits by specifying daytime and nighttime Permissible Sound Levels (PSLs) that

should not be exceeded at nearby residential dwellings. The PSL values are based on an assumed ambient sound level at the dwelling, which is determined on the basis of local population density (dwelling unit density) and proximity to transportation noise sources.

A key feature of Summit's noise reduction strategy is the construction of a 3 metre (m) high berm around the gravel pit. Summit would also implement the following additional noise control measures:

1. Limit the hours of operations;
2. Use low-noise equipment selection, or an acoustical shroud, barrier, or enclosure to limit the crusher noise levels when required;
3. Prioritize construction of the berm at locations where equipment would be operating closest to the property line;
4. Ensure all equipment is equipped with engine exhaust silencers, and that all equipment noise control systems (including but not limited to exhaust silencers) are in good condition and functioning properly; and
5. Inform nearby residents of upcoming activities that are expected to have higher noise impacts, including the nature of the activity and expected duration.

Noise would be monitored hourly at two (2) monitoring locations to confirm actual noise originating from the site. This information would be used to support the modification of onsite activities when required. At the time of Development Permit, the Applicant would be required to provide an update to the Noise Assessment, prepared by a qualified professional, taking into consideration any new developments (neighboring gravel operations) in the vicinity of the site. Based on the findings, the applicant may be required to implement further noise mitigation measures to lessen the impact of the proposed pit to nearby residences.

Big Hill Springs Aggregate Producers Group (BHSAPG) & Cumulative Impacts

It is to be noted that there are three other Council adopted Master Site Development Plans (MSDPs) for gravel pits near the subject lands. In 2017, the Applicant, together with the other gravel operators in the area, created a group called the Big Hill Springs Aggregate Producers Group (BHSAPG) for which all operators were to share a joint set of operating standards. Despite the subsequent Court of Queen's Bench decisions revoking the land use approvals for these projects, the adopted MSDP's remain in place committing the operators to the joint operating standards. Section F of the proposed MSDP incorporates each of the joint commitments as previously adopted by Council.

Respectfully submitted,

Concurrence,

"Theresa Cochran"

"Al Hoggan"

Executive Director
Community Development Services

Chief Administrative Officer

JA/lt

ATTACHMENTS:

- ATTACHMENT 'A': Application Information
- ATTACHMENT 'B': Application Referrals
- ATTACHMENT 'C': Summit Master Site Development Plan
- ATTACHMENT 'D': Map Set



ATTACHMENT 'A': APPLICATION INFORMATION

<p>APPLICANT: B & A Planning Group (Ken Venner)</p>	<p>OWNERS: 1410266 Alberta Ltd.</p>
<p>DATE APPLICATION RECEIVED: March 10, 2020</p>	<p>DATE DEEMED COMPLETE: March 10, 2020</p>
<p>GROSS AREA: ± 130.69 hectares (± 322.95 acres)</p>	<p>LEGAL DESCRIPTION: NW/SW-31-26-03-W05M</p>
<p>SOILS (C.L.I. from A.R.C.): 4H, F, P, W, T - Severe limitations to cereal crop production due to temperature limiting factors, excessive wetness/poor drainage, low natural fertility, adverse topography (steep and/or long uniform slopes) and excessive surface stoniness.</p>	
<p>HISTORY:</p> <p>September 16, 2019 The Court of Queen’s Bench of Alberta issued a decision setting aside the bylaw providing for redesignation to Natural Resource Industrial District (PL20170184).</p> <p>April 24, 2018 Council approved an application to amend the Summit Master Site Development Plan (PL20170145).</p> <p>April 24, 2018 Council approved an application to redesignate a portion of the lands (136 acres) from Ranch and Farm District to Natural Resource Industrial District (PL20170184).</p> <p>September 26, 2017 Council approved an application to adopt the Summit Master Site Development Plan (PL20150100).</p> <p>July 11, 2017 Council approved an application to redesignate a portion of the lands (25 acres) from Ranch and Farm District to Natural Resource Industrial District (PL20150101).</p>	
<p>PUBLIC & AGENCY SUBMISSIONS:</p> <p>The application was circulated to 48 adjacent landowners. Nine (9) letters in support and eighty three (83) in opposition were received in response and are attached to the redesignation report (PL20200031; E-1).</p> <p>The application was also circulated to a number of internal and external agencies, as depicted in Attachment 'B'; relevant comments are addressed within 'Additional Considerations' above if applicable.</p>	



ATTACHMENT 'B': APPLICATION REFERRALS

AGENCY	COMMENTS
<i>Province of Alberta</i>	
Alberta Environment and Parks	Summit's hydrological assessment is the best I've seen for all the proposals in the area. It provides useful modelling calculations on the impacts on Big Hill Spring (increase of: .4 L/s to .7 L/s). Also mentioned in the email is our desire to know the impacts of increased flow on the tufa in the park (geological significant feature for Alberta). It would be great if a cumulative impact assessment could evaluate the potential increase in flow from all the proposals and the resulting potential impact on tufa.
Alberta Health Services	<p>Thanks for referring the application to Alberta Health Services (AHS) for review. It's our understanding that this application is for the Summit Aggregate Pit located at W 1/2 31-26-3 W5M.</p> <p>AHS has reviewed the provided Summit Pit Master Site Development Plan (MSDP) (dated March 2020) and verifies it is an amendment to the original MSDP (dated September 25, 2015), and the subsequent relevant applications, including PL20150100-MSDP PL20150101-Redesignation (dated January 2016), PL 20170145 – Redesignation (dated September 2017) and PL20170184 (dated December 2017).</p> <p>AHS has no concern with the information provided in the MSDP and has no additional comments to those communicated to you before.</p>
Alberta Transportation	<p>In reviewing the application, the proposed development falls within the control distance of a provincial highway as outlined in the Highways Development and Protection Act / Regulation, and will require a roadside development permit from Alberta Transportation.</p> <p>The application form and instructions can be obtained from the department's website at https://www.alberta.ca/roadside-development-permits.aspx.</p> <p>The department has the following additional comments on the referral:</p> <ol style="list-style-type: none"> <li data-bbox="532 1352 1474 1514">1. Ownership of sand and gravel resources is subject to Section 58 of the Land and Property Act, Chapter L-7 RSA 2000. Prior to extraction of these resources beneath a statutory road allowance or road plan, these roads must be closed and disposed of as outlined in Section 22 of the Municipal Government Act, Chapter M-26 RSA 2000. <li data-bbox="532 1535 1455 1734">2. A Traffic Impact Assessment (TIA) shall be prepared by a qualified transportation professional, and reviewed by Alberta Transportation. The TIA must provide information regarding the traffic that could be generated by the proposed development, review safety impacts of the additional traffic, and will identify any necessary upgrades to the Highway intersection. <li data-bbox="532 1755 1455 1881">3. Design and construction of highway improvements to support the proposed development is to be completed at no cost to Alberta Transportation, and to the satisfaction of Alberta Transportation and Rocky View County.



AGENCY

COMMENTS

Alberta Transportation has reviewed and accepted the TIA and supplemental information, and will require construction of the Type IV intersection treatment as a condition of development permit approval.

**Internal
Departments**

Planning and
Development
Services -
Engineering

General

- The review of this file is based upon the application submitted. These conditions/recommendations may be subject to change to ensure best practices and procedures.
- As the application is for aggregate mining, prior to issuance of future DP, the applicant is to provide payment of the Community Aggregate Payment Levy in accordance with Bylaw C-7748-2018, as amended, in the amount of \$0.40 per ton of aggregate extracted and removed.
- At the DP Stage, the applicant is required to provide a Construction Management Plan for the construction of the Type IVa intersection at Range Road 40 and Highway 567 and the paving of Range Road 40 in accordance with County's servicing standards.
- At the DP Stage, the applicant will be required to provide a detailed reclamation plan for the Phase I area in accordance with the MSDP and the requirements under the Code of Practice for Gravel Pits published by AEP. The plan shall address:
 - the progressive reclamation of the pit in terms of operating and un-reclaimed areas compared to reclaimed areas to ensure a maximum open pit area of 40 acres at any given time;
 - the reclamation monitoring and maintenance plan to ensure the success of the reclamation activities;
 - Implementation of the recommendations of the slope stability assessment prepared in support of reclamation activities.
- At the DP stage, the applicant is required to provide a comprehensive landscaping plan, prepared by a qualified Landscape professional. Architect, for the Phase I area showing the landscaping elements that are to be incorporated into the berm, setback and entrance areas.
- The applicant provided an updated Air Quality Assessment, prepared by SLR Consulting (Canada) Ltd., dated May 21, 2020. The assessment was done to provide an air quality assessment of emissions associated with the activities and operations of the proposed aggregate development. The assessment concluded that the proposed mining operation is not expected to exceed Alberta Ambient Air Quality objectives beyond the subject lands and have limited impact to nearby residences. Some operating best-practice options were recommended to reduce dust emissions such as the application of Calcium Chloride to unpaved roads for dust suppression, adding shrouds to conveyor drops and the application of watering on mine surfaces.

AGENCY	COMMENTS
	<p>The report further recommends crushing equipment(s) should be located at least 190 m from the easterly boundary and 140 m from all other site boundaries.</p> <ul style="list-style-type: none"> The applicant provided an Acoustic Assessment Report, prepared by SLR Consulting (Canada) Ltd., dated May 21, 2020. The acoustic Assessment was done to assess the potential sound egress from the site operations in relation to the nearest noise sensitive receptors. The assessment concluded that the Summit operations should not exceed the sound level criterion at any noise sensitive receptors, with the inclusion of the proposed acoustic mitigation measures. The mitigation measures are incorporated as policies in Section 17 of MSDP. <p>Geotechnical:</p> <ul style="list-style-type: none"> The applicant provided a Hydrogeological Assessment Report prepared by SLR Consulting (Canada) Ltd. dated January 14, 2020. The report concludes that the mining of the aggregate resources will be extracted to a maximum of 1.0 m above the maximum level of the groundwater table. No adverse net impact of development at the site on surface water or groundwater users in the vicinity is expected. At the DP Stage, the applicant will be required to implement a groundwater measurement program and provide the County with new groundwater readings at the boundaries of the Phase I area. The record should provide information on the fluctuations in groundwater levels to ensure gravel extraction activities remain a minimum of 1.0 m above the highest recorded groundwater reading at all times. At the DP Stage, the applicant is required to implement a groundwater measurement program for which the applicant is to install piezometers within the open pit area to take monthly readings of the groundwater levels to ensure mining activities remain a minimum of 1.0 m above the recorded groundwater levels at all times. The applicant will be required to keep a log to record the readings and be able to provide the County with the log upon request and include the log in the Annual Operations Report. At the DP Stage, the applicant may be required to provide a Geotechnical Assessment which provides slope stability recommendations for Phase I of the gravel pit. The assessment is to provide recommendations for slope design and setbacks in the active pit areas as well as for final reclaimed conditions. At the DP Stage, the applicant is required to provide a geotechnical report, prepared by a qualified geotechnical professional, providing a pavement structure design for the Type IVa intersectional improvement at Range Road 40 and Highway 567 and for the pavement structure of Range Road 40 to the satisfaction of AT and the County. <p>Transportation:</p> <ul style="list-style-type: none"> Access to the site will be via Range Road 40. The applicant provided an updated TIA, prepared by Watt Consulting Group, dated March 10, 2020. The TIA provided an update to the analysis completed in 2014 for intersection of Highway 567 and Range Road 40. As per the



AGENCY	COMMENTS
	<p>updated TIA, a Type II intersection would be required upon opening day, a Type III intersection at the 10-year horizon and a Type IVa intersection at the 20-year horizon.</p> <ul style="list-style-type: none"> • As per the MSDP, Mountain Ash Limited Partnership intend to construct a Type IVa intersection at Highway 567 and Range Road 40 at the initial Stage 1 of the extraction operation to satisfy the ultimate 20-year horizon. • At the DP Stage, the applicant will be required to enter into a Development Agreement with the County for: <ul style="list-style-type: none"> ○ The upgrade of Range Road 40 to an industrial paved standard (400.6) from Highway 567 to the site access (approximately 400 m); ○ Upgrade of the intersection of Range Road 40 and Highway 567 to a Type IVa standard including all signage and any other roadside indicators to the satisfaction of AT; ○ Implementation of the recommendations of the geotechnical report and pavement structure design; ○ Implementation of the recommendations of the Construction Management Plan; and ○ Implementation of the recommendations of the illumination and climbing lane warrants as required. • At the DP stage, the applicant is required to provide an intersection illumination warrant analysis, prepared by a qualified professional, to determine if any illumination is warranted at the Type IVa intersection of Range Road 40 and Highway 567. • At the DP stage, the applicant is required to provide a climbing lane warrant, prepared by a qualified professional, to determine if there is a need for a climbing lane to allow for the safe entrance of truck traffic onto the highway from the intersection of Range Road 40 and Highway 567. Should a climbing lane is warranted, the construction of climbing lane is required to be done through a Development Agreement. • It was noted in the MSDP, Phase 5 of the operation proposes to excavate and mine under the Road Allowance at Range Road 40, which currently provides access to multiple properties. The applicant will be required to close and consolidate road allowance and obtain appropriate approvals to mine within the Road Allowance. • At the DP stage, the applicant will be required to provide a Traffic Management Plan in accordance with Joint Operating Standards which shall address: <ul style="list-style-type: none"> ○ measures to control driving behavior of aggregate haulers; ○ use and monitoring of in-vehicle monitoring systems; ○ turning movements onto the Highway to provide recommendations to optimize safety of Highway users; and ○ measures to be implemented to prevent the transfer of aggregate and other detritus materials onto the Highway and local road network.



AGENCY	COMMENTS
	<ul style="list-style-type: none"> At the DP stage, the applicant will be required to provide payment of the Transportation Offsite Levy, in accordance with the current levy for the total gross acreage of the gravel pit and areas associated with gravel extraction activities. <p>Sanitary/Waste Water:</p> <ul style="list-style-type: none"> As per the MSDP, the sanitary servicing will be provided by portable facilities. Engineering has no concerns at this time. <p>Water Supply And Waterworks:</p> <ul style="list-style-type: none"> As per the MSDP, the water servicing will be provided by portable facilities. Engineering has no concerns at this time. <p>Stormwater Management:</p> <ul style="list-style-type: none"> The applicant provided a Conceptual Stormwater Management Report prepared by SLR Global Environmental Solutions dated January 2020, which provides the overall stormwater management concept for the gravel pit. The stormwater management strategy will be implemented over six phases as the site develops. The surface water management measures for each stage include perimeter and interception ditches, settlement ponds and discharge sumps. At the DP stage, the applicant will be required to provide a detailed stormwater management plan for the Phase I pit area, which follows the stormwater management concepts outlined in the SLR Global Environmental Solutions Report dated January 2020 and meets the requirements of the County Servicing Standards. It's to be noted that stormwater ponds are required to be lined to avoid contamination of groundwater and risk mobilizing existing contaminants in the soil or groundwater. As the concept relies on the discharge of stormwater via groundwater discharge sumps, the applicant will be required to provide confirmation of AEP approval for the implementation of the discharge sumps for any release to the environment. At the DP stage, the applicant will be required to provide an Erosion & Sedimentation Control Plan (ESC) prepared by a qualified professional, providing the ESC measures to be implemented onsite during the operation of the pit in accordance with the MSDP and the requirements of the County Servicing Standards. At the DP Stage, the applicant will be required to provide an Erosion & Sedimentation Control (ESC) Plan prepared by a qualified professional, providing the ESC measures to be implemented for the construction of the Type IVa intersectional at Range Road 40 and Highway 560 and the paving of Range Road 40. <p>Environmental:</p> <ul style="list-style-type: none"> The applicant provided a Biophysical Impact Assessment (BIA) prepared by SLR Global Environmental Solutions dated January 2020.



AGENCY	COMMENTS
	<ul style="list-style-type: none"> • Following are the findings of BIA: <ul style="list-style-type: none"> ○ Soil: The on-site soils have low wind erosion risk and moderate water erosion risk; no sensitive soils were observed within the Project area during the field investigation. ○ Vegetation: Vegetation in the project area has been heavily modified by agricultural land use. No rare plants were found in the Project area. No prohibited or noxious weeds listed under the Weed Control Act were observed. ○ Wildlife: Provincially sensitive species and federally listed species have the potential to be present within the Project area. The Project area consists of primarily disturbed habitat and the area surrounding the Project consists of a similar intensive agricultural land use. The Project is expected to result in minimal loss of wildlife habitat, and no interaction with or disturbance to species at risk. ○ Wetland: 20 wetlands are present within the project area and close vicinity. Based on the conceptual footprint for the Project, the two larger wetlands in the northwest corner of the Project area and 4 wetlands in the sensitive SW corner of the Project area will be avoided. The other 14 wetlands will be removed to accommodate planned development phases through AEP approval. ○ Water Resources: No mapped watercourses were identified in the Project area during the desktop review, and no obvious drainages were observed during the field assessment. • It was noted in the BIA through a hydrological assessment that the groundwater beneath the Project area eventually discharges at the Big Hill Springs. It is proposed that the excavation will be operated “dry” (i.e. above the water table, with no dewatering needed). The study determined that the wetlands are all surface water fed, with no permanent groundwater source. • As per the BIA, the area has a high potential to contain a historic resource of archeological concern. Prior to issuance of future DP, the applicant will be required to obtain clearance under the Historical Resources Act prior to commencing with mining activities. • The applicant provided a Wetland Assessment and Impact Report, prepared by SLR global environmental solutions, dated February 2020. As per the Wetland assessment and impact report, no mapped watercourses are identified within the project area. A total of 20 wetlands were identified for the project area and assessed in the field. Submission under the Water Act and the Public Lands Act will be required for the disturbance to these wetlands. • At the DP stage, the applicant will be required to obtain all permits and approvals under the Water Act and public lands act for any wetlands that may be impacted due to the gravel extraction activities.



AGENCY	COMMENTS
Transportation Services	<ul style="list-style-type: none"> For gravel pit operations applicant to be reminded to adhere to the conditions within the County's Community Aggregate Payment (CAP) Levy Bylaw. <p>Applicant to be reminded to adhere to the conditions identified within the County Noise Bylaw.</p>
Agricultural & Environmental Services	<p>Application involves Development along Alberta Transportation Road Allowance. Therefore recommend applications to be circulated to Alberta Transportation for review and comments.</p> <p>It may be of benefit to the applicant to create a Weed Management Plan and have a contractor available (or be personally prepared) to control any regulated weeds. The applicant will need to ensure compliance with the Alberta Weed Control Act.</p>

Circulation Period: (April 7, 2020 to April 30, 2020)

Agencies that did not respond, expressed no concerns, or were not required for distribution, are not listed.

DEC 7
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Master Site Development Plan

The Summit Pit

DRAFT for Public Hearing Purposes



MOUNTAIN ASH
• LIMITED PARTNERSHIP •

b&a



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LIMITED PARTNERSHIP

Summit Aggregate Pit

Master Site Development Plan

The logo for b&a, featuring the lowercase letters 'b&a' in white on a red square background.

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Overview

SECTION A

1.0 Motivation & Rationale

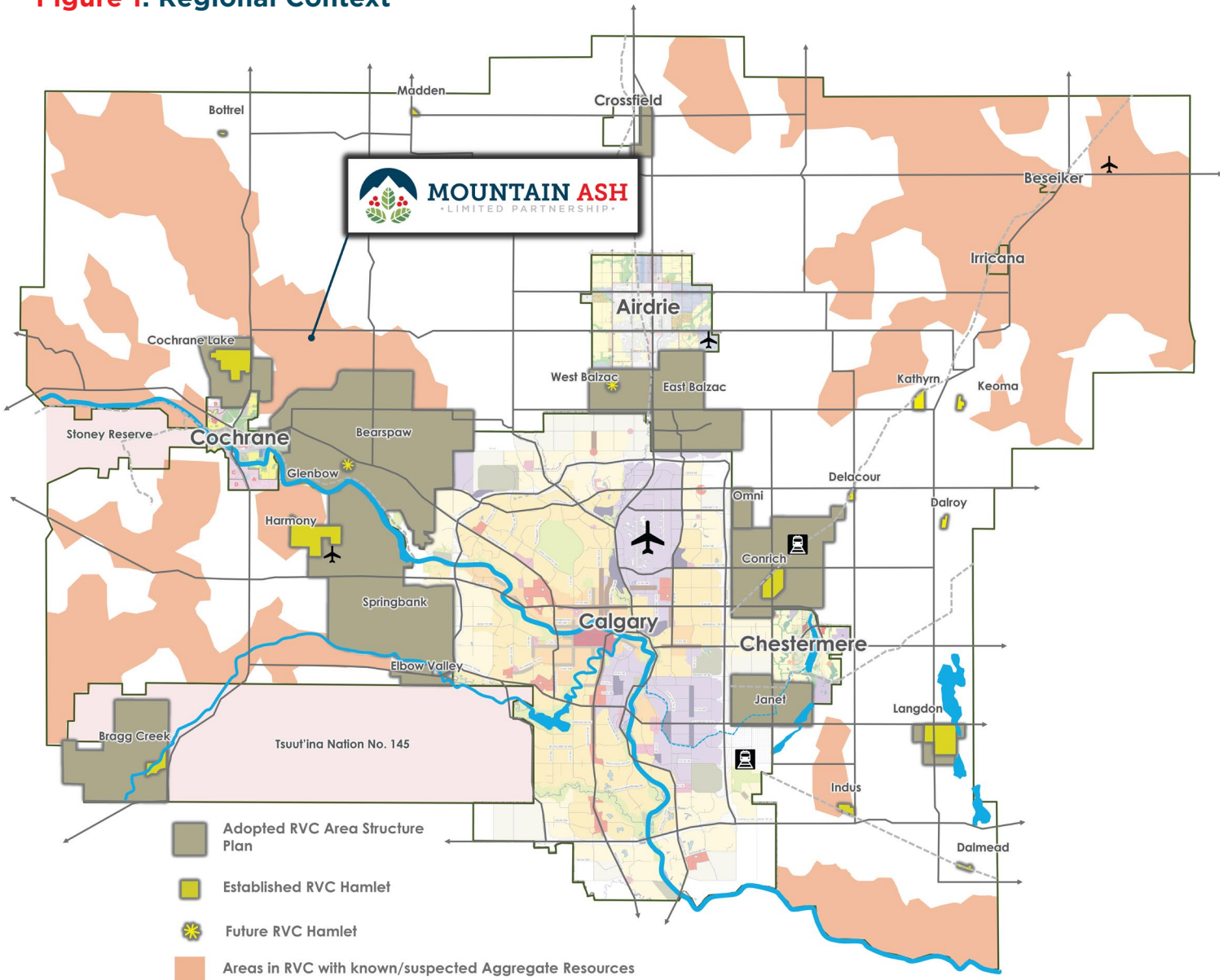
Aggregates are non-renewable resources found only in locations where natural processes have placed them. They are essential to support the development of roads, buildings, and municipal infrastructure. The Calgary Metropolitan Region has traditionally enjoyed benefits from close supply of large aggregate reserves. However, these reserves are depleting due to impacts of rapid urbanization and subsequent sterilization of gravel deposits due to development encroachment.

The Calgary Metropolitan Region lacks a comprehensive areas of approved land use specifically intended to secure a stable, long-term supply of aggregate. As illustrated by **Figure 1: Regional Context**, the Summit Pit's location is close to municipalities with high aggregate demand including Airdrie, north Calgary, and the Highway 2 corridor. The site has direct access to Highway 567 for aggregate hauling that would minimize truck traffic on municipal roads within the surrounding community. As such, proposed smaller aggregate operations such as the Summit Pit can serve an important role to ensure a steady, cost-effective supply of aggregate products for infrastructure projects throughout the north-central portion of the Metropolitan Region.

Mountain Ash Limited Partnership, hereby referred to as 'Mountain Ash', is committed to ensuring the proposed aggregate operation contemplated by this MSDP responds to and appropriately mitigates potential for negative cumulative impacts relative to adjacent lands. Mountain Ash acknowledges that proposals for aggregate operations often create concerns from adjacent neighbours relative to noise, dust, traffic, groundwater, and visual impacts. Prior to preparing this MSDP, Mountain Ash representatives contacted all neighbouring landowners within a +/- 800 m radius of the Plan area with an offer for an in-person meeting to share the motivation & rationale for this MSDP and gather initial feedback accordingly. Mountain Ash will host a community-wide Information Session later in the RVC application process prior to the proposal being presented to Council. Mountain Ash will continue to work collaboratively with local stakeholders and the County to ensure the design of this proposed aggregate operation is consistent with municipal & provincial policies and implementation of the proposed operations project appropriately addresses potential cumulative effects.

Section F of this MSDP includes a comprehensive list of implementation strategies that Mountain Ash is willing to advocate for as part of a local aggregate producer's group which could assist the County to establish a framework to assess and mitigate potential cumulative impacts resulting from multiple aggregate pits operating within the same general location.

Figure 1: Regional Context




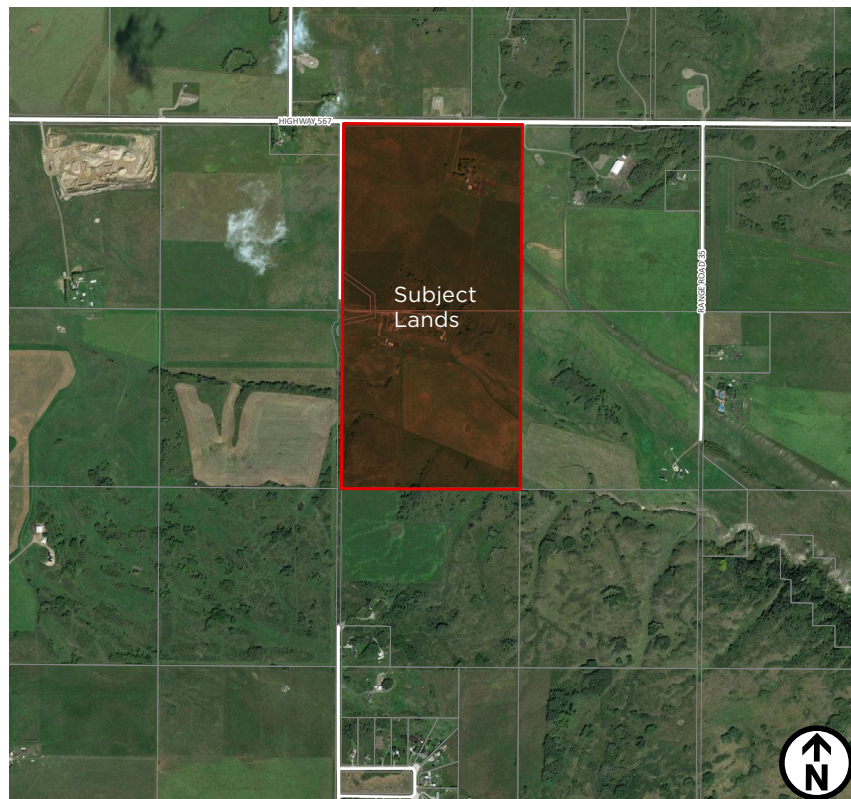
2.0 The Proposal

As illustrated by **Figure 2: Local Context**, the proposed Summit Pit is located along Highway 567 northeast of the Town of Cochrane. The Plan area is legally defined as at W 1/2 31-26-3 W5M and contains +/- 131 ha (+/- 323 ac). Mountain Ash is locally owned company which intends to develop an aggregate extraction operation within a portion of the subject land. The area surrounding the MSDP area includes an evolving mix of agricultural, farmsteads and business land uses such as natural resource industrial, oil & gas wells, and highway business development.

On-site operations are proposed to include stripping of topsoil & overburden materials, mining of the underlying sand and gravel, and eventual reclamation of all disturbed areas. The sand & gravel excavated within the site will be crushed & screened and shipped to markets around Balzac, Calgary International Airport and north Calgary growth areas. Reclamation of the pit will be phased and will follow closely behind discontinued mining operations, with a maximum of +/- 40 acres open for excavation at any one time. The site will be returned to agricultural uses upon completion. Mountain Ash anticipates a 30 to 40-year operating period to be implemented by the County via a series of staged development permits to be submitted throughout the life of the project.

Figure 2:
Local Context

 Subject Land



3.0 Purpose of the Master Site Development Plan

.....

This Master Site Development Plan (MSDP) establishes a policy framework to describe how the proposed aggregate operation will be implemented in accordance with the sustainability principles of the County Plan which supports the extraction of natural resources in a manner that balances the interests of affected landowners, industry, and society at large. The MSDP includes a policy framework intended to provide guidance for a subsequent land use redesignation and a series of development permit processes within the Plan area.

This MSDP includes an overall description of the proposed aggregate operation including a site development aggregate extraction plan, a reclamation & environmental mitigation strategy, identification of potential impacts & mitigations to surrounding lands, an assessment of cumulative aspects of other aggregate activities to the surrounding area, and a summary of interim & post reclamation land uses that may coincide with aggregate operations.

To support the MSDP policy framework, Mountain Ash has prepared a variety of technical reports including the following:

- a. Biophysical Impact Assessment Report
- b. Wetland Assessment Impact Report;
- c. Hydrogeological Impact Assessment;
- d. Conceptual Stormwater Management Report;
- e. Transportation Impact Assessment;
- f. Acoustic Assessment;
- g. Air Quality Assessment; and
- h. Visual Appraisal.

4.0 Municipal Policy Framework

.....

This Master Site Development Plan (MSDP) complies with the relevant policies of the County Plan (Bylaw C-7280-2013) and provides guidance for the land use redesignation and development permit process. This MSDP establishes specific expectations about how the project will be implemented including phasing, proposed operations, reclamation, transportation, and community considerations. It includes a policy framework that describes how the aggregate operation will be implemented in accordance with various principles of the County Plan which “supports the extraction of natural resources in a manner that balances the needs of residents, industry, and society” (Section 15.0, page 67).

4.1 The County Plan, Municipal Development Plan (2013)

Section 15: Natural Resources of the County Plan contains applicable policies related to aggregate resource extraction when offsite impacts related to operations can be mitigated. Section 15.6 of the County Plan indicates that “until such a time as a County aggregate extraction policy is prepared, applications for aggregate extraction shall prepare a master site development plan that address the development review criteria identified in Section 29.” Further guidance on the preparation of an aggregate master site development plan can be found in Appendix C, Section 4 of the County Plan.

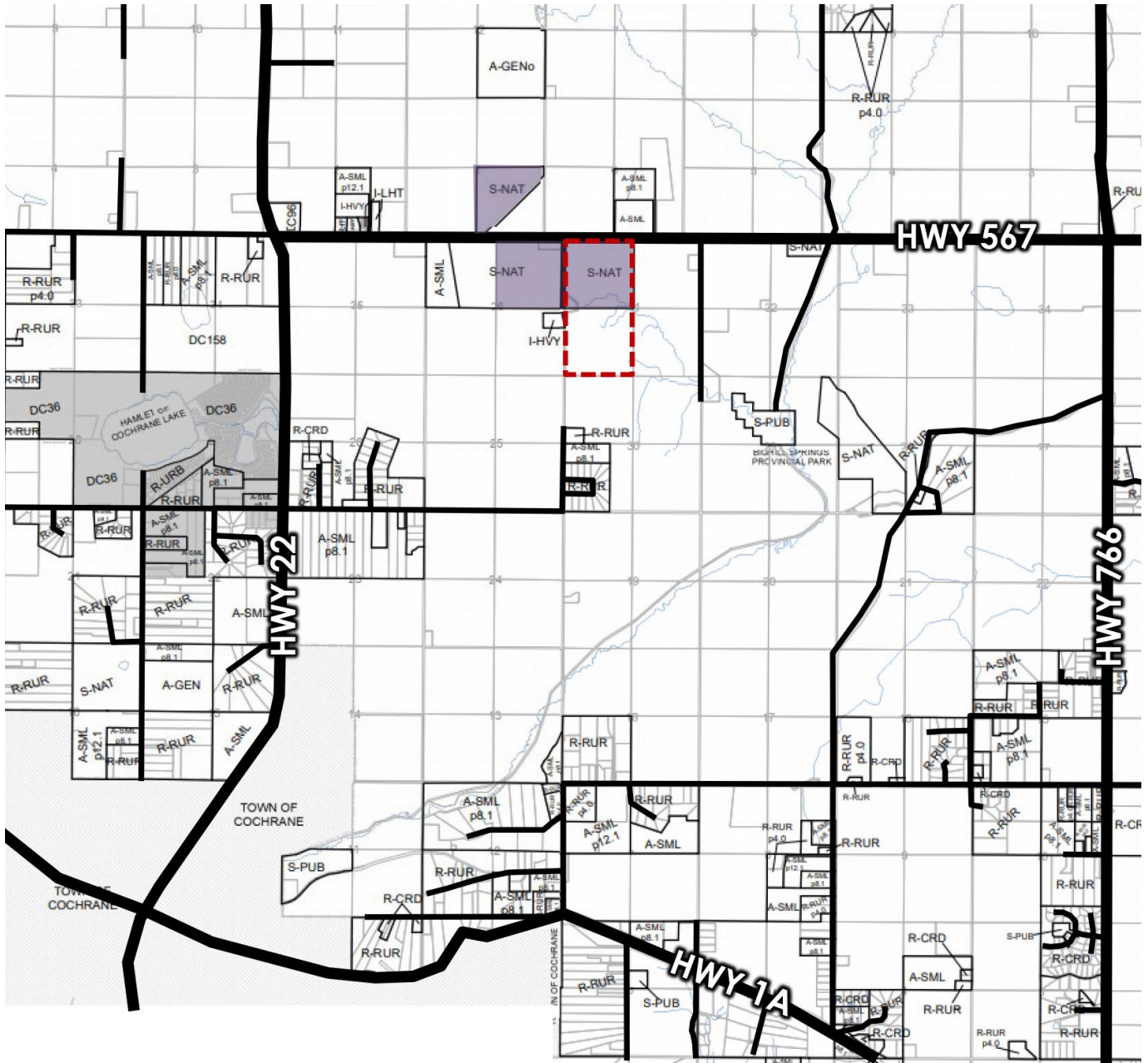
As the County has not yet prepared an aggregate extraction policy, this MSDP has been prepared in accordance with the County Plan’s Section 15.6 and is intended to address the comprehensive policy and technical requirements governing same in order to provide Council, administration, relevant stakeholders and area residents with a sound understanding of the merits of the proposal.

4.2 Existing Land Use Bylaw (C-8000-2020)

As illustrated by **Figure 3: Existing Land Use**, the subject lands are currently designated with a mix of Agriculture, General District (A-GEN) and Special, Natural Resources (S-NAT) under the Rocky View Land Use Bylaw C-8000-2020. The NW 31 is presently designated Special, Natural Resource (S-NAT) and the SW 31 is designated Agriculture, General District (A-GEN).

Pursuant to the September 16, 2019 decision from the Court of Queen’s Bench (Docket 1701 12053), Justice J.T. Eamon set aside RVC Council’s decision to approve the NRI District within NW 31. Notwithstanding that the County is presently challenging this court ruling, for purposes of this MSDP, it is assumed that the existing land use for NW 31 is Agriculture, General District (A-GEN).

Figure 3: Existing Land Use



Recently approved NRI Designation subject to Court of Queen's Bench
 (Docket 1701 12053)





Site Description

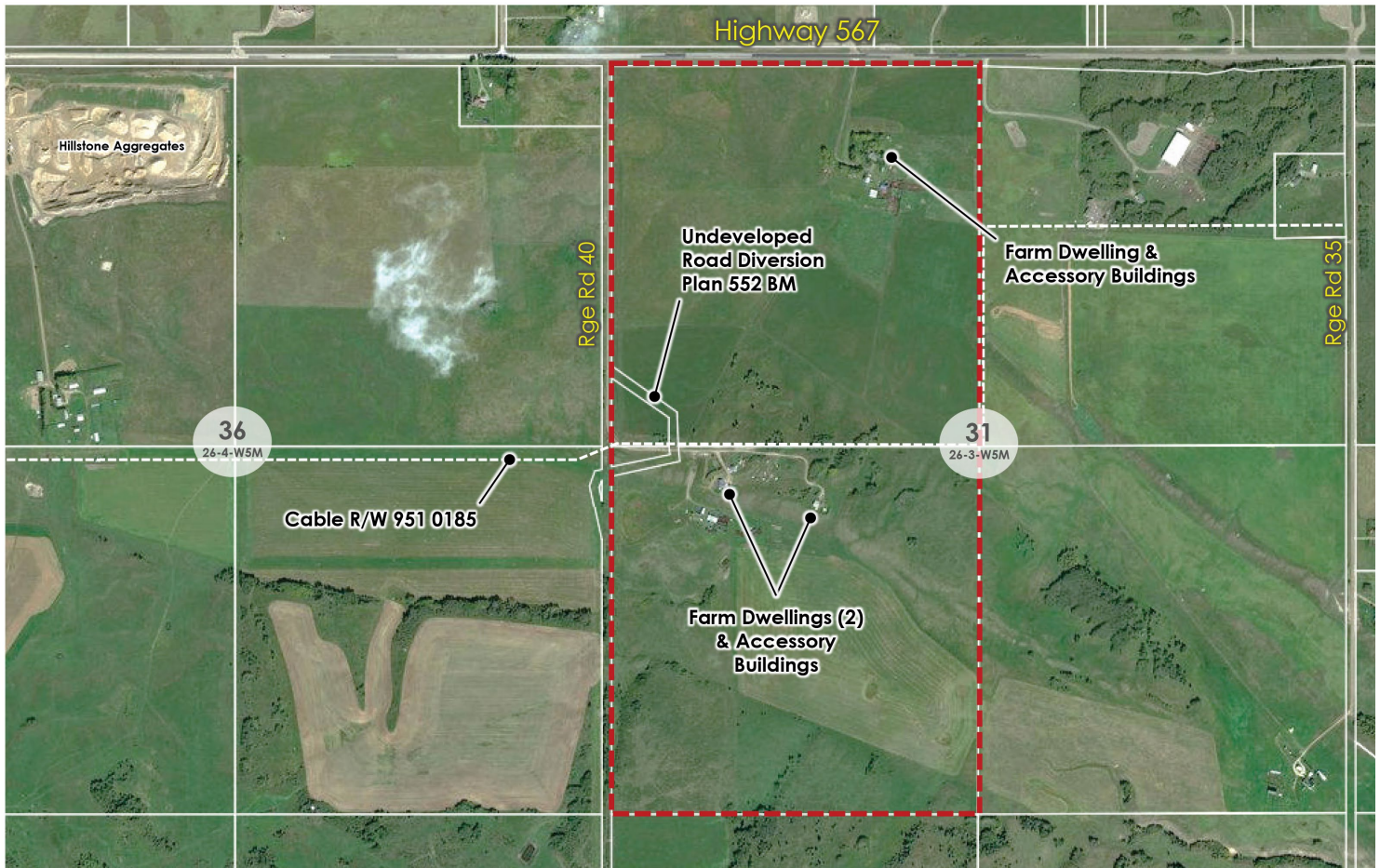
SECTION B

5.0 Local Area Context

The subject lands are situated within an area featuring a range of land uses including agricultural, farmsteads and a mix of non-residential land uses, existing aggregate operations, oil & gas wells, and highway commercial development.

The MSDP area fronts onto a provincial highway (Highway 567) which is ideally suited to accommodate the conveyance of aggregate resources from the Plan area to local and regional markets.

Figure 4: Site Conditions



6.0 Site Conditions

A summary of the existing site conditions is provided in the following sections based on field observations and the findings of various technical studies prepared by Mountain Ash in support of this MSDP.

6.1 Legal Descriptions & Existing Developments

As illustrated by **Figure 4: Site Conditions**, the subject lands include the W 1/2 31-26-3-W5M and described generally as follows:

- NW 31 contains +/- 66.27 ha (+/- 163.76 ac) bounded by Highway 567 to the north and Range Road 40 to the west. The parcel includes an existing farm building site containing an existing dwelling and shelter belt, various accessory buildings, various livestock corrals, a PSTS & groundwater well, and approach & driveway from Highway 567. The Plan area contains an undeveloped road ROW which is proposed to be closed and consolidated with the subject lands. A right-of-way containing a telecommunications line traverses the quarter section along the southern boundary.
- SW 31 contains +/- 64.4 ha (+/- 159.19 ac) bounded to the west by Range Road 40. The parcel includes an existing farm building site containing two (2) existing dwellings and shelter belts, various accessory buildings, various livestock corrals, a dugout, two (2) PSTS & groundwater wells, and a driveway from Range Road 40.

6.2 Topography

As illustrated on **Figure 5: Topography**, slopes within the MSDP Area is undulating, with elevations ranging from a high point of 1,298m in NW 31 to a low point of 1,270m in SW 31. The subject lands slopes towards generally towards the south and east. The majority of NW 31 is relatively flat with a slight southwest facing aspect. The SW 31 contains a relatively flat area in the northern portion of the quarter with slopes falling into a natural valley system that extends to the southeast towards the Big Hill Creek.

6.3 Biophysical Considerations

Mountain Ash prepared a Biophysical Impact Assessment Report in support this MSDP. According to the conclusions of this report, the MSDP area does not contain any rare plants, plant communities or sensitive soils that will be negatively impacted by the proposed aggregate operations.

The site does not contain any watercourses or obvious drainages that may have hydraulic connections with adjacent lands.

Although the site contains evidence of migratory birds, the relatively small area of habitat to be disturbed is not likely to negatively impact wildlife species in the area. Care must be taken to restrict development disturbances during the nesting bird season (i.e. mid Apr – late August).

POLICIES:

6.3.1 Aggregate development within the MSDP area shall comply with all relevant municipal, provincial and federal legislation, regulations and policies.

Figure 5: Topography



6.4 Wetlands

Mountain Ash prepared a Wetland Assessment Impact Report (WAIR) in support of this MSDP. As illustrated by **Figure 6: Existing Wetlands**, the MSDP area contains twenty (20) identified wetlands, the majority of which contain Class I seasonal wetlands which are regularly farmed through. The MSDP area does not contain any wetlands that are expected to be claimed by Alberta Public Lands.

With the exception on Wetlands #19 and #20, all identified wetlands are proposed to be disturbed by proposed aggregate operations. As such, Mountain Ash has prepared the WAIR to categorize each wetland and establish compensation amounts in accordance with the Alberta Wetland Policy to be provided to the Province at the development permit stage.

6.5 Historic Resource Act Considerations

Clearance for development disturbance was previously provided for the NW 31 by Alberta Culture in September 2014 in accordance with the Historic Resource Act.



Figure 6: Existing Wetlands







Aggregate Operations

SECTION C

7.0 Site Development Plan

As illustrated by **Figure 7: Development Concept**, on-site operations will include stripping of topsoil & overburden materials, stockpiling of same within the site, mining of the underlying sand and gravel, and eventual reclamation of all disturbed areas.

Topsoil and overburden will be used to construct a landscaped screening buffer along the highway frontage and the eastern boundary of the MSDP area.

A portable scale will be installed at the entrance to the site along Rge Rd 40 south of the intersection with Highway 567. All sand and gravel will be excavated by a front-end loader and fed into a portable crushing & screening spread that will operate within the site as demand for gravel occurs. Aggregate product will be loaded onto trucks from the stockpiles to be conveyed through the scale house prior to being hauled to regional markets.

Aggregate products excavated within the site will be crushed, screened and shipped to markets around Balzac, Calgary International Airport and north Calgary growth areas.

Mountain Ash anticipates a 30 to 40-year operating period to be implemented by the County via a series of staged development permits to be submitted throughout the life of the project.

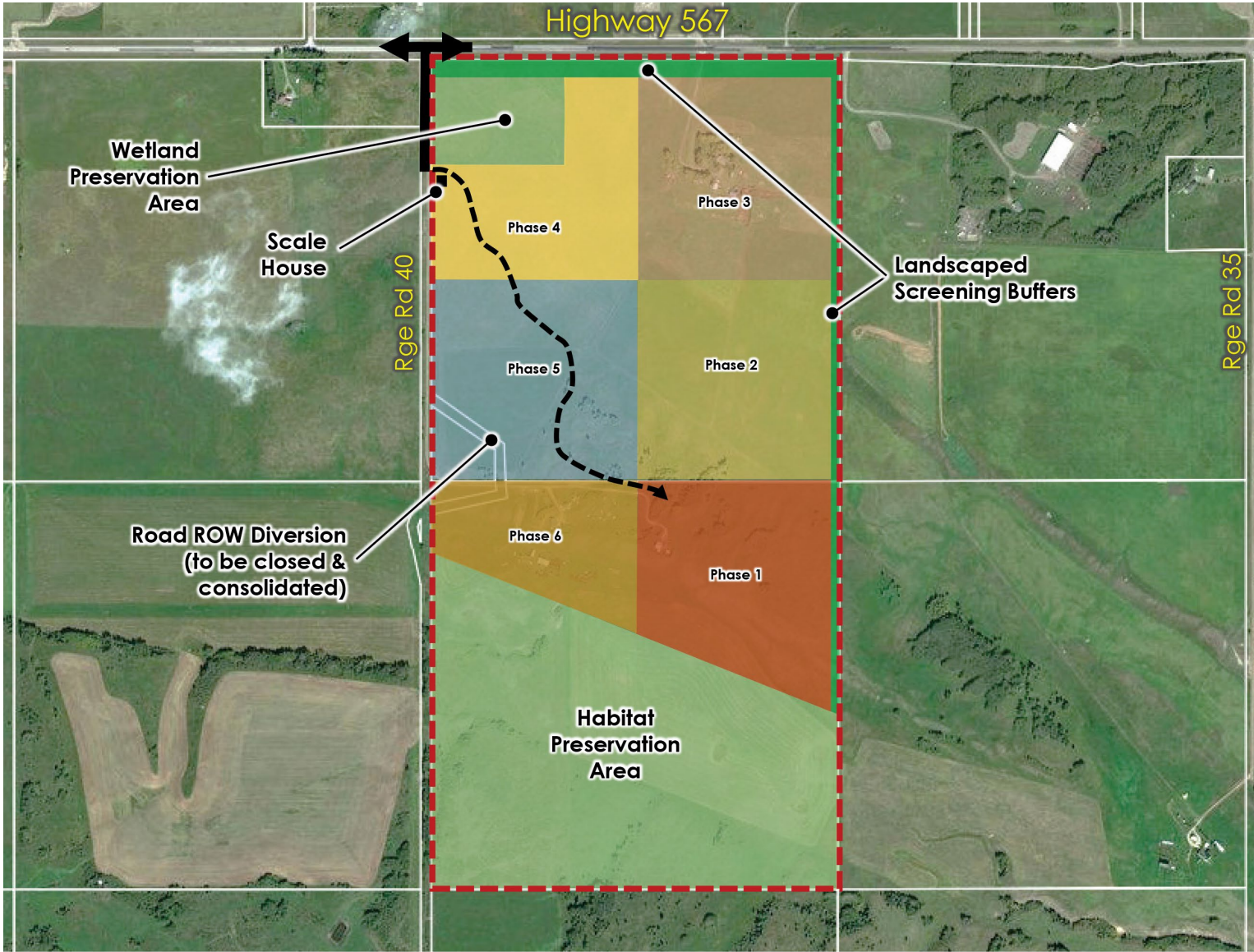
Reclamation of the pit will be phased and will follow closely behind discontinued mining operations, with a typical maximum of +/- 40 acres open for excavation at any one time. The site will be returned to agricultural uses upon completion.

POLICIES:

7.1 Aggregate operations within the MSDP are expected to proceed as generally illustrated on Figure 7: Development Concept.

Aggregate Operations

Figure 7: Development Concept



8.0 Typical Operations

Typical extraction and aggregate production within each operational phase are expected to include simultaneous support from one (1) portable crusher, one (1) loader, one (1) bulldozer, and three (3) scrapers.

Potable water and sanitary servicing will be supplied by portable facilities managed by Mountain Ash via a local contractor. Similarly, waste refuse facilities will be provided onsite and removed on a weekly basis and transported to an approved waste management facility.

A scale house and administrative office will be constructed on site in a suitable location to ensure safe effective on-site logistics related to the export of aggregates from this location.

Hours of operation within the proposed Summit Pit are expected to occur Mondays - Fridays from 7 AM to 7 PM and Saturdays from 7 AM to 5 PM. No aggregate operations (including crushing activities) will occur on Sundays or Statutory Holidays.

POLICIES:

- 8.1** *An Operations & Management Plan shall be submitted at the development permit application stage to clarify the specific requirements in support of each operational phase.*
- 8.2** *Hours of operation within the MSDP area are expected to occur Mondays - Fridays from 7 AM to 7 PM and Saturdays from 7 AM to 5 PM.*
- 8.3** *No aggregate operations will occur within the site on Sundays or Statutory Holidays. No crushing activities will occur within the site on Sundays or Statutory Holidays¹.*
- 8.4** *The size of the operating area shall be limited to a maximum of 40 acres at each development phase as determined through applicable County development permit approvals and AEP approvals pursuant to the Code of Practice for Pits in Alberta.*

¹ Mountain Ash has made a commitment to the current landowner situated immediately east of the MSDP area to NOT undertake crushing activities on Saturdays for as long as he continues to reside on the property. Once this landowner no longer resides on his property, Mountain Ash expects to commence crushing activities on Saturdays.

Aggregate Operations

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9.0 Stormwater Management

Mountain Ash prepared a Conceptual Stormwater Management Plan in support of this MSDP to demonstrate how rainfall & surface runoff within the proposed aggregate operation will be managed throughout the course of development. As illustrated by **Figure 8: Stormwater Management**, Mountain Ash will manage stormwater within the site to prevent flooding downstream, to prevent pollution of the underlying aquifer or surface water bodies, to provide a gravity system to contain surface drainage that does not require active pumping, to separately manage runoff from undisturbed areas (clean runoff) whenever possible, and to ensure operations are not negatively affected by stormwater runoff.

As described by the Conceptual Stormwater Management Report, a strategy to manage surface drainage within each phase of aggregate operations is described as follows:

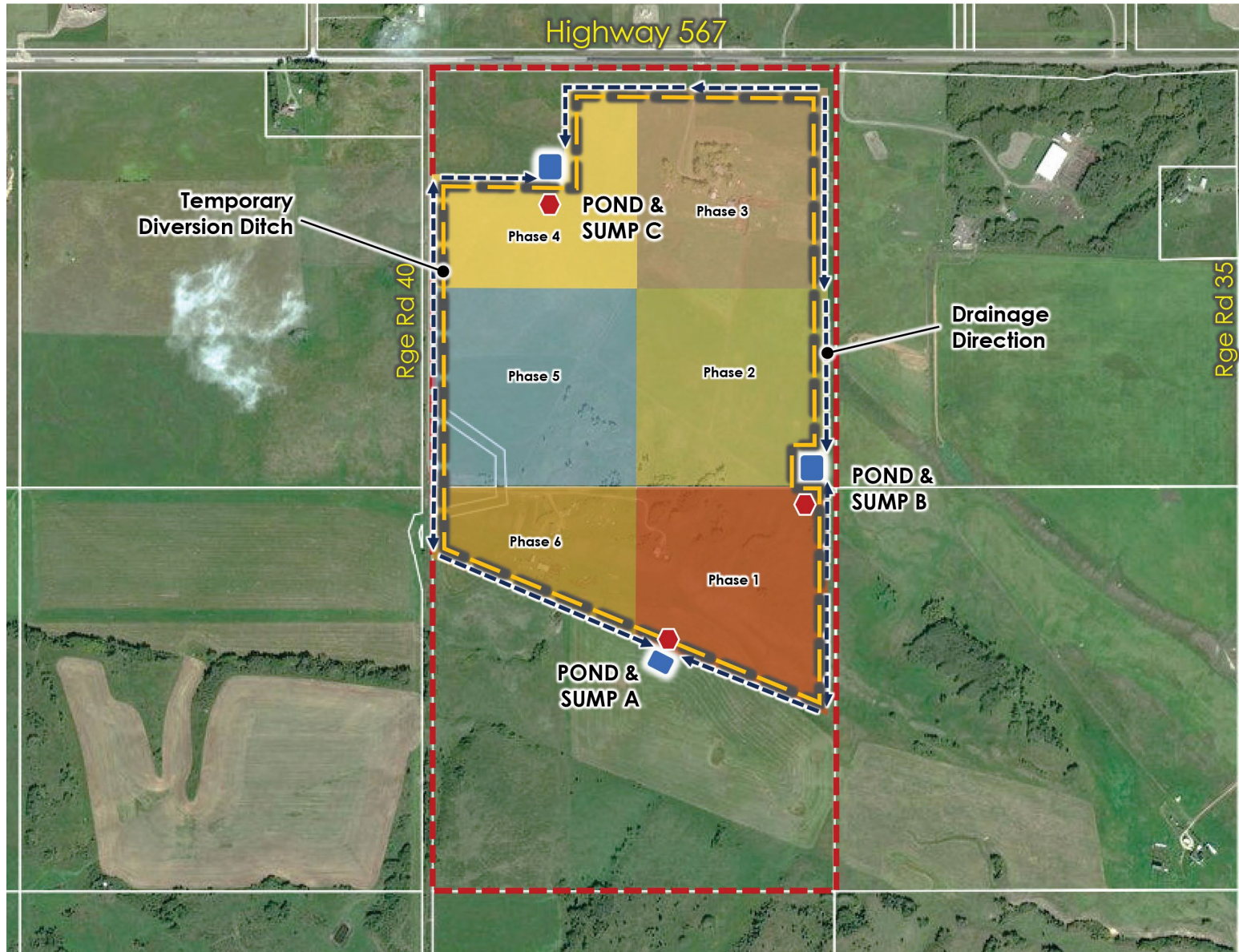
- Install **perimeter vegetated ditches at the outer foot of screening berms as initial treatment with appropriately sized settlement ponds as secondary treatment;**
- **Excavate a sump into underlying sand & gravels to form an area for groundwater recharge (i.e. tertiary treatment);** and
- Provide interception ditches to route clean runoff away from extraction areas and allow for overland dispersal.

POLICIES:

9.1 Stormwater management within the MSDP is expected to occur as generally illustrated on Figure 8: Stormwater Management.

9.2 A Site-Specific Stormwater Management Plan shall be submitted at the development permit application stage to clarify the specific stormwater management requirements in support of each operational phase.

Figure 8: Stormwater Management



10.0 Groundwater Management

Mountain Ash prepared a Hydrogeological Impact Assessment in support this MSDP to address concerns about the effect of an aggregate operation on local groundwater resources. The purpose of the assessment was to determine if the project would affect:

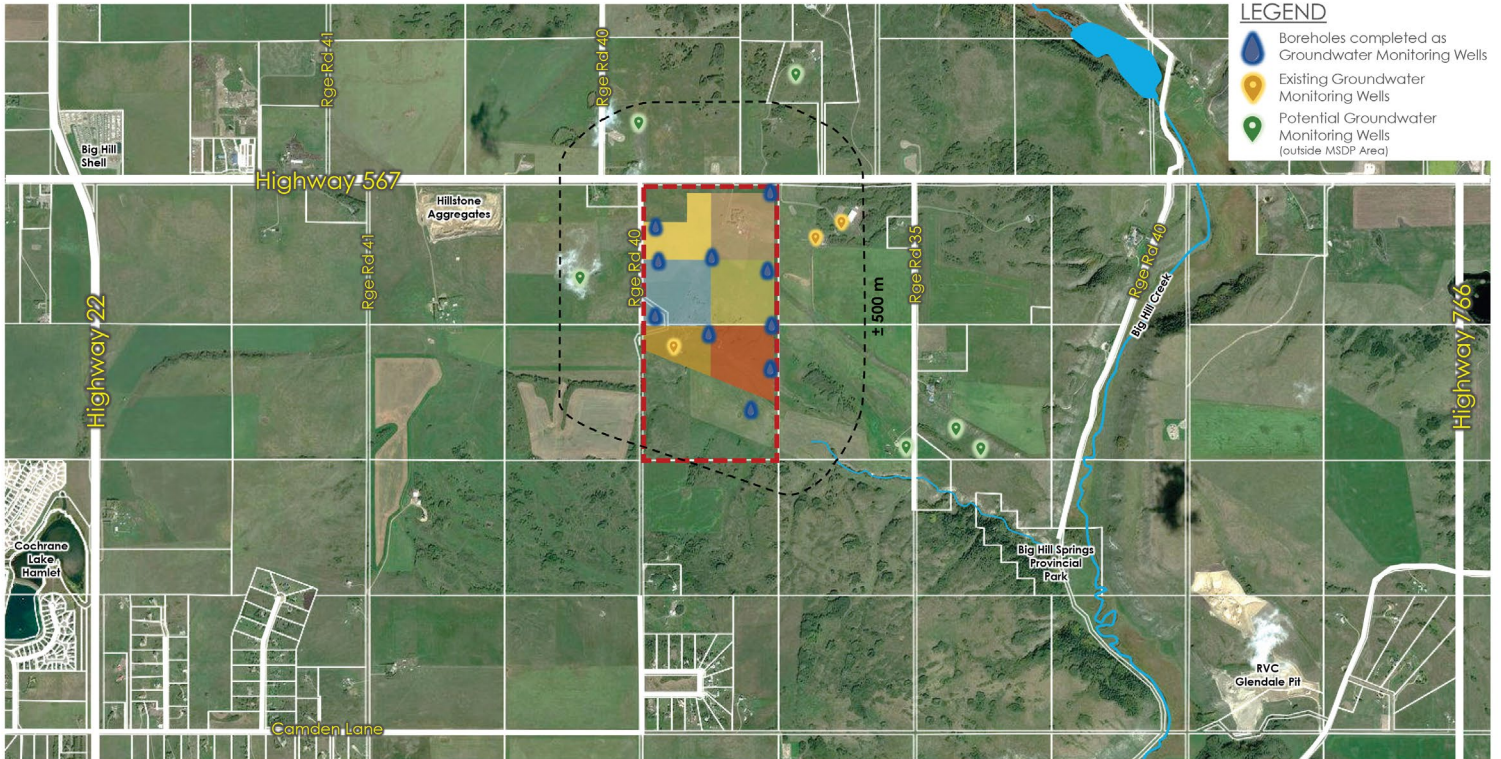
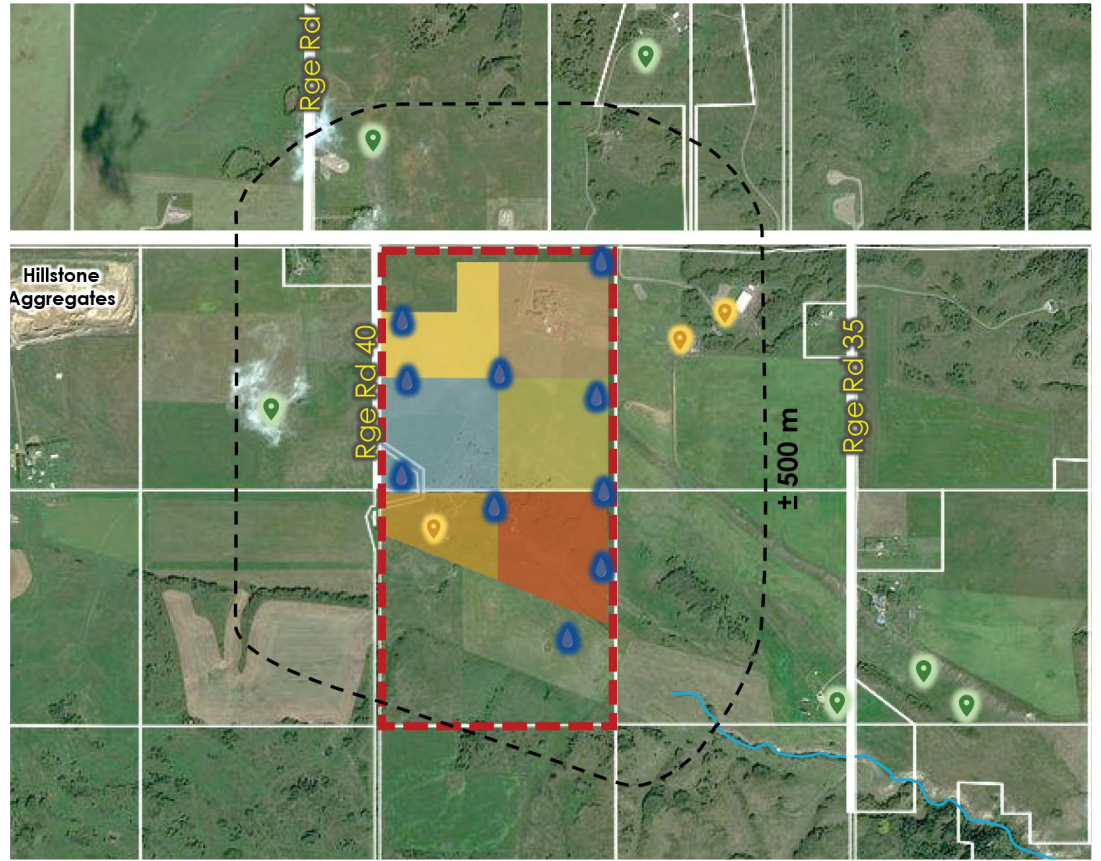
- The confined/unconfined aquifers at or near the proposed Summit Pit development,
- Neighbours within a +/- 500 m radius of the proposed site, and/or
- The Big Hill Creek.

The conclusions of the Hydrogeological Impact Assessment indicate the proposed aggregate extraction will not pose any significant or adverse impacts to the existing confined or unconfined groundwater aquifers underlying the MSDP area, or the adjacent Big Hills Springs, as it pertains to water volume or water quality. To ensure there are no negative effects to local groundwater conditions, Mountain Ash will restrict excavate to a minimum of 1.0 m above the depth of the groundwater table. As such, ongoing excavation activities will not create negative impact to the underlying groundwater aquifer quantity and quality.

As illustrated by **Figure 9: Groundwater Monitoring**, Mountain Ash is committed to monitoring the existing groundwater flow system, to give early warning of any unanticipated changes, and to address community concerns related to groundwater, Mountain Ash has already completed an initial two (2)-year groundwater monitoring program to determine pre-development and early development groundwater levels. To support this MSDP, Mountain Ash has installed ten (10) groundwater monitoring wells (with piezometers) within the subject lands and will monitor four (4) additional existing domestic groundwater wells located within adjacent properties situated within +/- 500 m of the MSDP area. The monitoring program will track fluctuations in groundwater levels, on a monthly basis, in order to continuously measure the quantity and quality of groundwater within the underlying aquifer during the lifespan of the aggregate operation.

During the operational phase, any potential source of water pollution would be from human-caused sources such as fuels, solvents and suspended solids from reworking of the material on site. The potential for these human caused effects will be mitigated within the site by implementation of best handling practices under the Code of Practice for Pits, applicable Environmental Protection and Enhancement Act rules, and other relevant codes of best practice.

**Figure 9:
Groundwater
Monitoring**



POLICIES:

- 10.1** *A Groundwater Management Plan and Monitoring Program shall be submitted at the development permit application stage in support of each operational phase.*
- 10.2** *Mountain Ash will implement a Groundwater Monitoring Plan throughout the lifespan of the operation with the location of monitoring wells as generally illustrated on Figure 9: Groundwater Monitoring.*
- 10.3** *Groundwater management techniques shall be implemented in accordance with the conclusions and recommendations of the Hydrogeological Assessment prepared in support of this MSDP.*
- 10.4** *As per the Code of Practice for Pits in Alberta all mining operations will be a minimum of 1.0 m above the groundwater table.*
- 10.5** *All potential sources of groundwater contamination from human-caused sources shall be mitigated using best handling practices under the Code of Practice for Pits, Environmental Protection & Enhancement Act rules, and other codes of best practice.*
- 10.6** *The Groundwater Monitoring Program shall be completed monthly and Mountain Ash shall provide results to interested stakeholders upon request.*
- 10.7** *Mountain Ash shall provide a 24-hour number for neighbours within the immediate vicinity to report issues with groundwater relative to aggregate operations within the MSDP area.*
- 10.8** *Mountain Ash shall promptly investigate any community concerns it receives about groundwater wells in the vicinity of its operations.*

Aggregate Operations

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11.0 Site Access

Access to the site will be provided from Hwy 567 at the intersection of Rge Rd 40 as illustrated on **Figure 10: Site Access Plan**. Mountain Ash will upgrade this existing intersection with a Type IVa intersection treatment and improve the existing portion of Rge Rd 40 extending south to the MSDP area's main site access will be upgraded to a paved industrial standard road in accordance with the County Servicing Standards.

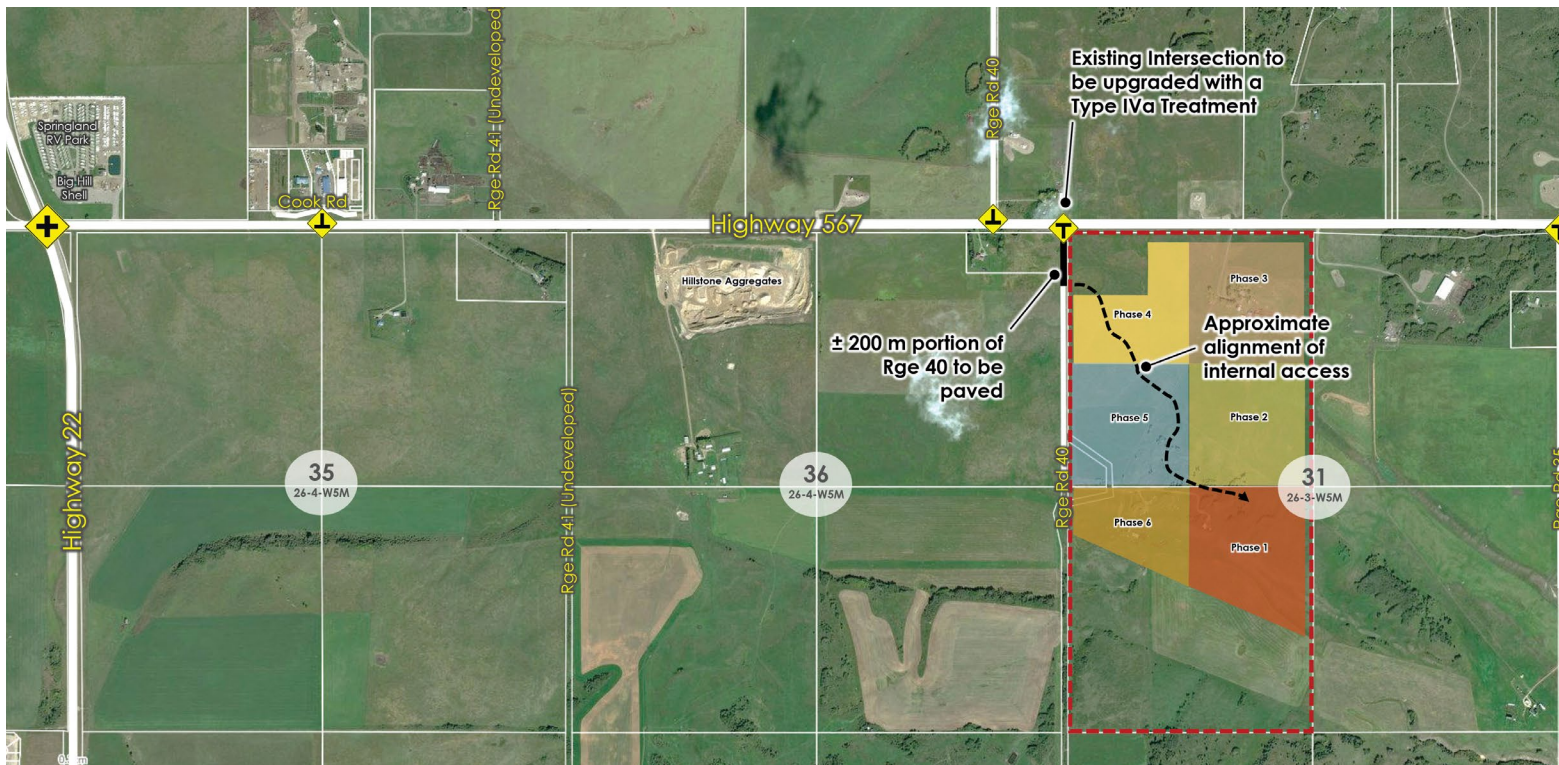
Mountain Ash prepared a Traffic Impact Assessment (TIA) in support of this MSDP. The TIA report concluded that, with the intersection improvement proposed at Highway 567, the roadway and intersection capacities relative to initial AM and PM peak traffic movements anticipated at opening day as well as the 10 and 20-year development horizons will continue to operate at acceptable levels.



POLICIES:

- 11.1 Access within the MSDP is expected to occur as generally illustrated on Figure 10: Site Access Plan.***
- 11.2 An updated Traffic Impact Assessment shall be submitted at the development permit application stage in support of each operational phase.***
- 11.3 Mountain Ash shall upgrade the intersection of Highway 567 and Range Road 40 with a Type IVa intersection as a condition of the Stage 1 development permit, to the satisfaction of the County and Alberta Transportation. AT shall be required to approve a Roadside Development Permit for this transportation improvement.***
- 11.4 Mountain Ash shall upgrade the portion of Road 40 extending south from Highway 567 to the main site access to an industrial paved standard as a condition of Stage 1 development permit in accordance with the County Servicing Standards.***
- 11.5 Where commercially feasible, all trucks servicing the Summit Pit shall be registered with the Alberta Sand & Gravel Association Truck Registry.***
- 11.6 Mountain Ash shall provide a 24-hour number for neighbours within the immediate vicinity to report issues with truck traffic relative to aggregate operations within the MSDP area.***

Aggregate Operations

Figure 10: Site Access Plan



-  Existing all-turns stop controlled intersection
-  Existing three-way stop controlled intersection

12.0 Truck Haul Routes

Highway 567 is a provincial high load corridor and ideally suited to accommodate aggregate resource hauling activities. Notwithstanding, Mountain Ash is committed to reducing the overall impact of its aggregate operations on the surrounding municipal and Provincial transportation network.

As illustrated by **Figure 11: Proposed Truck Haul Routes**, truck traffic from the Summit Pit is expected to be conveyed from the site along to key markets east of the site, such as Balzac, the Calgary Airport and the north Calgary growth areas via Highway 567.

Aggregate produced and transported to market from the Summit Pit will generally service markets east of the proposed aggregate development. Mountain Ash anticipates only 10% of all truck trips west into the Cochrane market due to the existing available supply of aggregates to that market. Mountain Ash proposes three (3) primary transportation routes/networks described as follows:

- **West Route:** Heading west on Highway 567 anticipated to include about 10% of truck trips.
- **East Route:** Heading east on Highway 567 anticipated to include about 90% of truck trips, with the following sub-routes described as follows:
 - » **East Route A** - Heading east on Highway 567, south on Highway 766, then east on Highway 1A into Calgary to include about 60% of East Route truck trips to and from Summit Pit operation.
 - » **East Route B** - Heading east on Highway 567 into west Airdrie to include about 15% of the East Route truck trips to and from Summit Pit operation.
 - » **East Route C** - Heading east on Highway 567, south on Hwy 772 (Symons Valley Road), then east on Hwy 566 into Balzac to include about 15% of the East Route truck trips to and from Summit Pit operations.

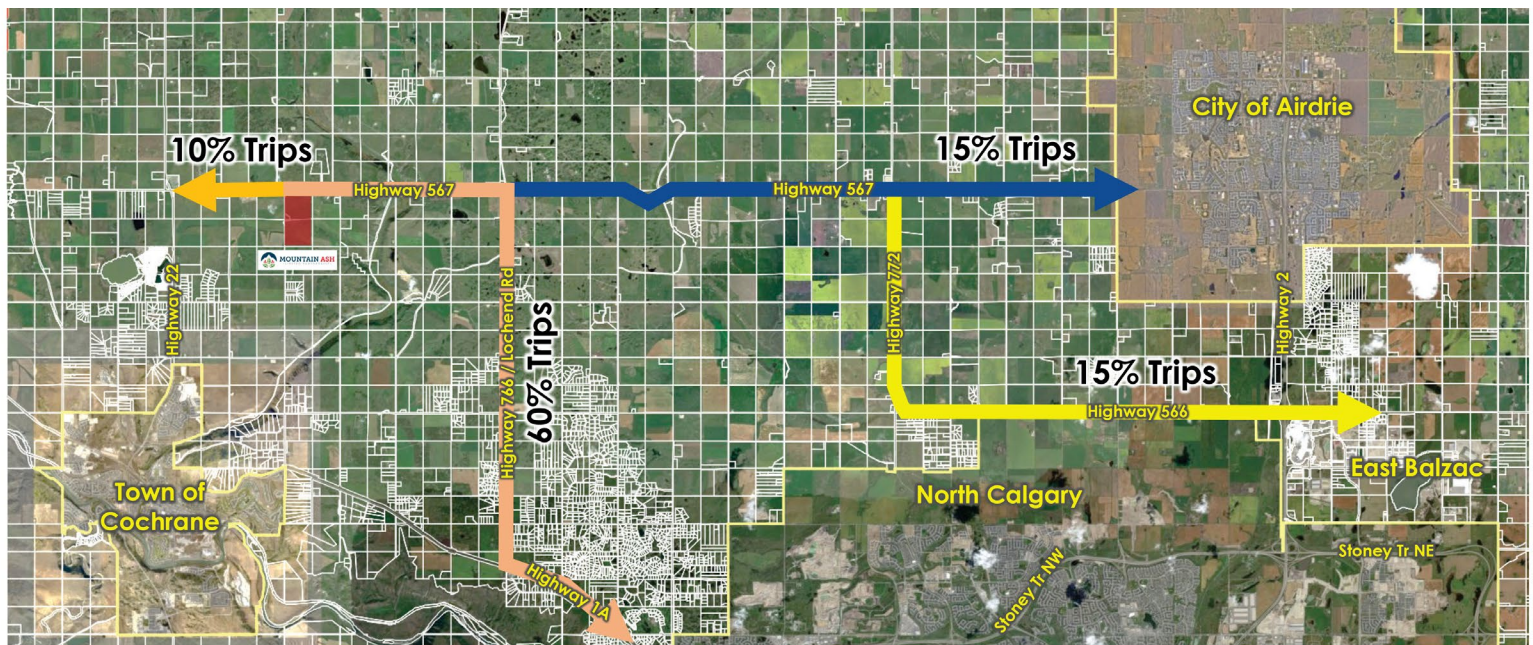
POLICIES:





12.1 *Truck haul routes servicing the MSDP are expected as generally illustrated on Figure 11: Proposed Truck Haul Routes*

12.2 *A Truck Haul Route Plan shall be submitted at the development permit application stage to clarify the specific transportation routes in support of each operational phase, to the satisfaction of the County and Alberta Transportation.*

Aggregate Operations

Figure 11: Proposed Truck Haul Routes



-  West Truck Route
-  East Truck Route A
-  East Truck Route B
-  East Truck Route C

13.0 Development Phasing & Mining Sequencing

As illustrated by **Figure 12: Development Phasing & Mining Sequencing Plan**, aggregate operations will commence within the Phase 1 area situated within the SE corner of the site. Extraction operations will progress in a northern direction towards the northern boundary of the MSDP area before shifting westerly and eventually southerly parallel to Rge Rd 40 before eventually concluding within the SW corner of the site.

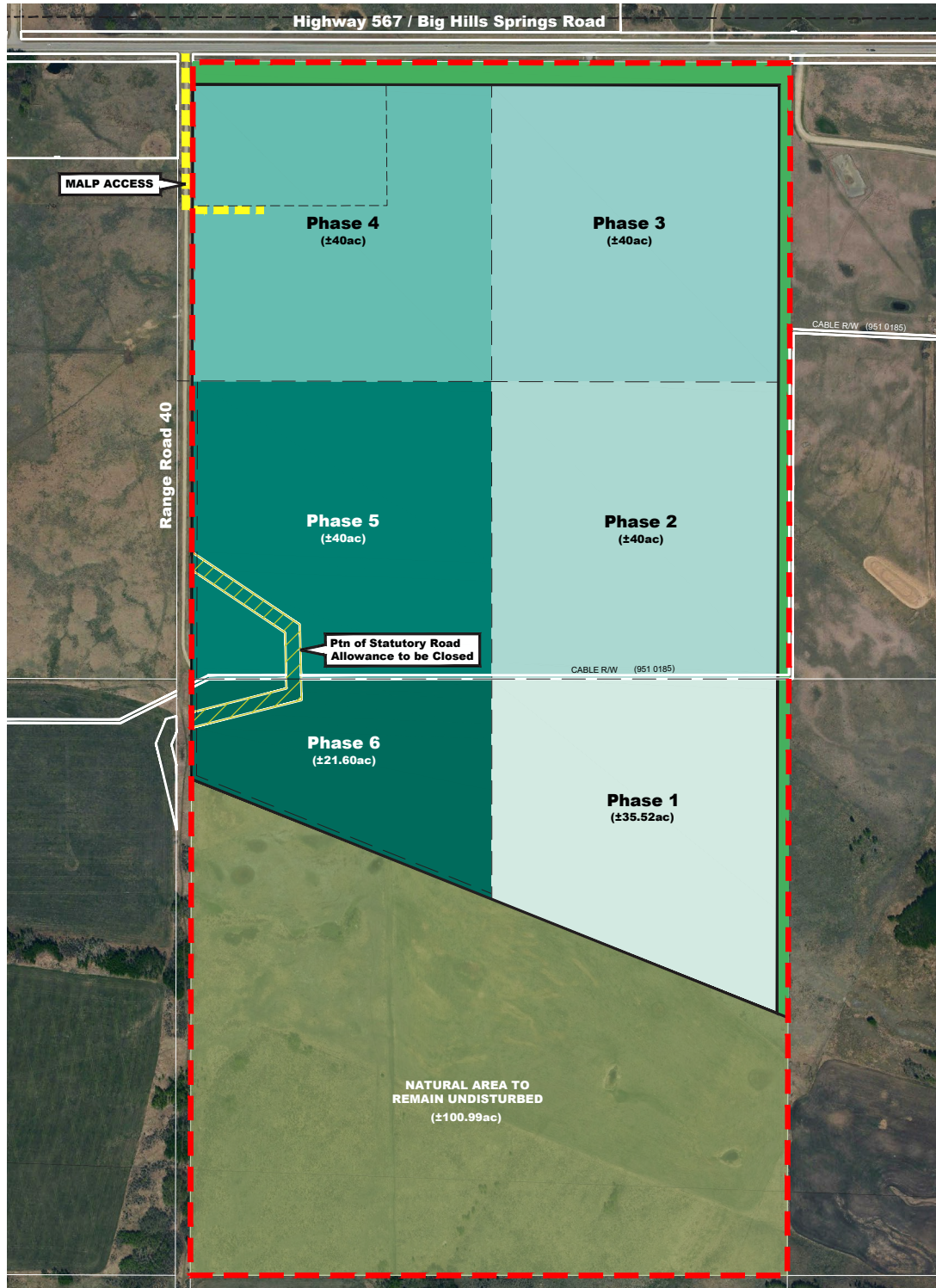
As part of development permit approval conditions for Phase 5, Mountain Ash must apply to close the existing undeveloped Roadway Diversion Plan 552 BM contained within the MSDP area for the purposes of consolidation.

Aggregate operations within the Summit Pit are expected to occur over a 30 to 40-year time frame depending on market conditions. Development permit approvals will be required to support each phase of the proposed aggregate operations.

POLICIES:

- 13.1** *Staging of aggregate operations within the MSDP area is expected to occur as generally illustrated on Figure 12: Development Phasing & Mining Sequencing Plan.*
- 13.2** *A Mining & Excavation Plan shall be provided at the development permit stage to detail how operations are expected to proceed within each development phase.*
- 13.3** *The existing undeveloped road diversion ROW Plan 552 BM contained within the MSDP area may be closed and consolidated with the subject lands as condition of the Phase 5 development permit associated with this proposed aggregate operations.*

Figure 12: Development Phasing and Mining Sequencing Plan



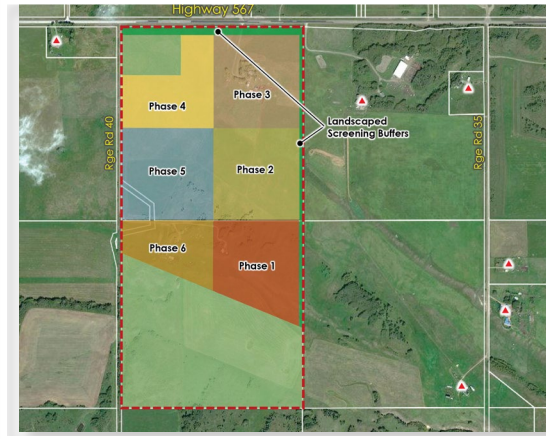
Legend

Subject Lands	MALP Access	Landscaped Screening Berm
Phase 1	Phase 4	Natural Area to Remain Undisturbed
Phase 2	Phase 5	Portion of Statutory Road Allowance to be Closed
Phase 3	Phase 6	

14.0 Visual Appraisal

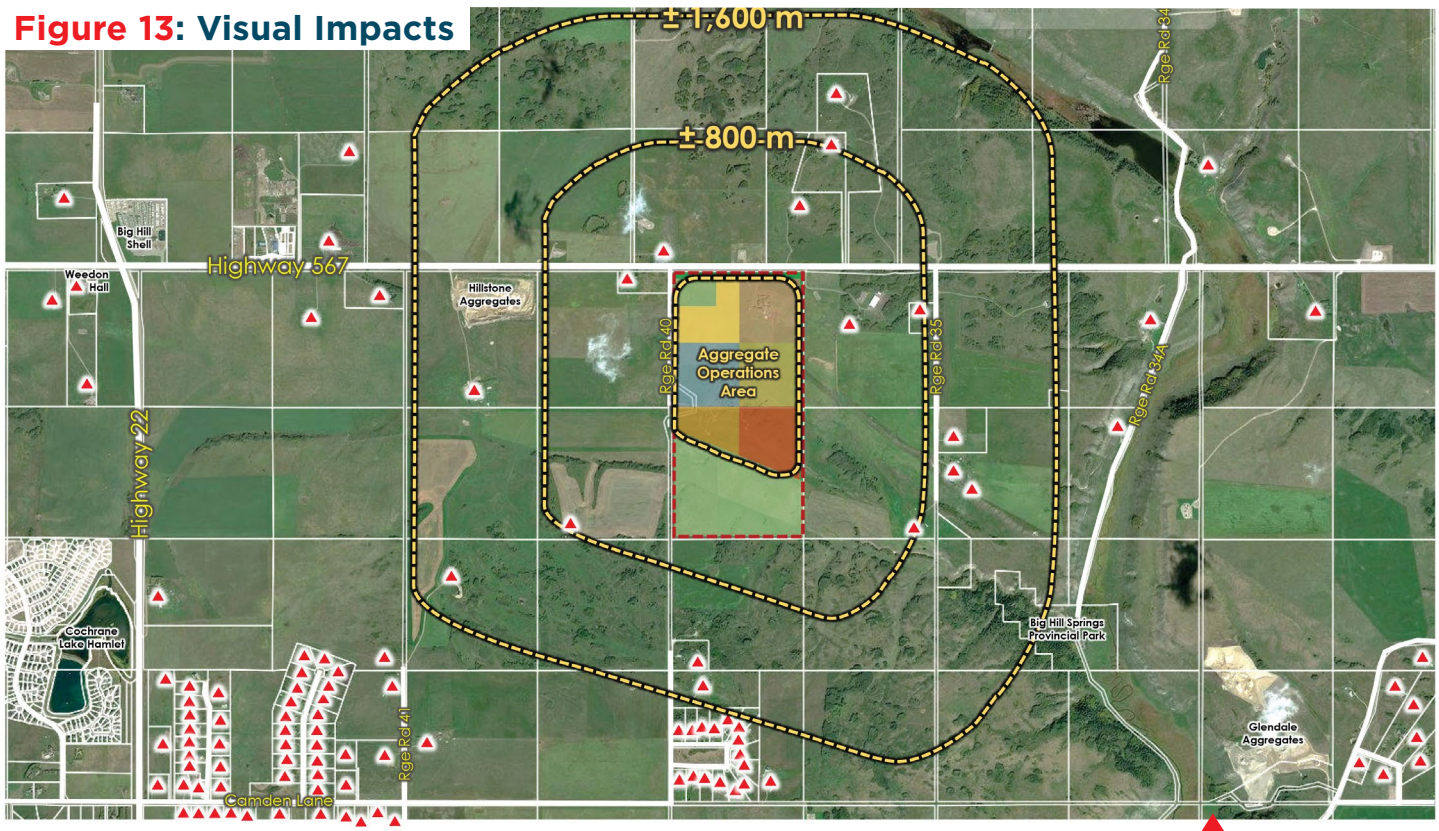
Mountain Ash prepared a Visual Appraisal in support this MSDP to assess the visual impacts the proposed aggregate operation will have on existing building sites within the vicinity of the subject lands as well as the travelling public passing by the site on Highway 567.

The conclusions of this report indicate that, although the proposed development will necessitate disturbance and alteration of the site's existing landform and vegetation, the overall visual impression provided from the perspective of the public driving through or passing by the site will remain mostly unchanged, given the phased development approach, installation of landscaped screening berms, and progressive reclamation activities proposed by this MSDP.



Landscaped screening berms will be constructed within the MSDP area to limit the exposure of operations when viewed from the highway and existing farm building sites directly to the east. A landscaped berm along the Highway 567 frontage will be constructed as part of the Phase 1 approvals and a berm along the eastern boundary of the Plan area will be constructed as part of the Phase 2 and 3 approvals. The developer will prepare a Landscaping Plan at each development permit stage to establish the specific design and location of the berms.

Figure 13: Visual Impacts



Aggregate Operations

15.0 Stripping & Grading

Stripping & grading of topsoil and overburden will be completed prior to mining activities proceeding within each operational phase. Stripped topsoil and overburden will be stockpiled to support construction of visual and sound attenuation berms. The material contained within each berm will be used for future reclamation processes once aggregate operations have concluded within each phase. Stockpiled topsoil & overburden will be placed into the depleted areas in the same order they were removed as per regulations found within the Code of Practice for Pits in Alberta. The topsoil layer will be seeded for pasture or annual crops after final reclamation.

Dust control, sediment/erosion control, and weed management control practices will be implemented during stripping and stockpiling activities.

POLICIES:

- 15.1 A Stripping & Grading Plan shall be provided at the development permit stage to detail how topsoil and overburden will be excavated within each development phase.***
- 15.2 All topsoil & overburden excavated within the site shall be stockpiled to be used to construct landscaped screening berms and to reclaim the excavated areas.***
- 15.3 As illustrated by the Figure 13: Visual Impact Assessment, sight and sound attenuation berms will be constructed in support of each operational phase prior to commencement of other aggregate activities.***
- 15.4 Stockpiled topsoil & overburden will be placed in the depleted areas in the same order they were removed in accordance with the Code of Practice for Pits in Alberta.***

16.0 Air Quality Considerations

Mountain Ash is committed to maintaining air quality within and in vicinity of the MSDP area throughout the lifespan of aggregate operations.

Mountain Ash prepared an Air Quality Assessment in support of this Master Site Development Plan to assess the anticipated emissions associated with the activities and operations of the proposed aggregate operation including diesel combustion products such as sulphur dioxide (SO₂), fine particulate matter with aerodynamic diameter less than 2.5 Qm (PM_{2.5}), carbon monoxide (CO), oxides of nitrogen (NO_x), and fugitive dust emissions from wheel entrainment and pit operations including total suspended particulates (TSP).

Dispersion modelling was executed following the Alberta Environment and Parks (AEP) – and its predecessor organizations dispersion modelling guidance (AESRD 20013b), using the CALMET and CALPUFF models with 5 years (2002-2006) of meteorological data. The results at the project boundary showed there were no predicted exceedances of the Alberta Ambient Air Quality Objectives (AAAQOs) for any modelled compounds and any averaging period. The predicted maximum concentrations at the sensitive receptors are all less than the AAAQOs for all modelling scenarios and all contaminants. Expected TSP concentrations will likely be lower, as the residences are surrounded by partially wooded areas and bushes which trap dust.

Some operating best-practice options were applied to reduce dust (TSP) emissions: the application of Calcium Chloride (CaCl₂) to unpaved roads for dust suppression, adding shrouds to conveyor drops and the application of watering on mine surfaces. Further, in order to avoid TSP exceedances along the property boundary, crushers should be located at least 190 m from the east site boundary and 140 m from the other site boundaries.

In conclusion, operation of the Project is not expected to exceed ambient air quality objectives beyond the property boundary and will have limited impact on air quality at the nearest residences, alone or in conjunction with emissions from other nearby operating industrial operations.

Aggregate Operations

POLICIES:

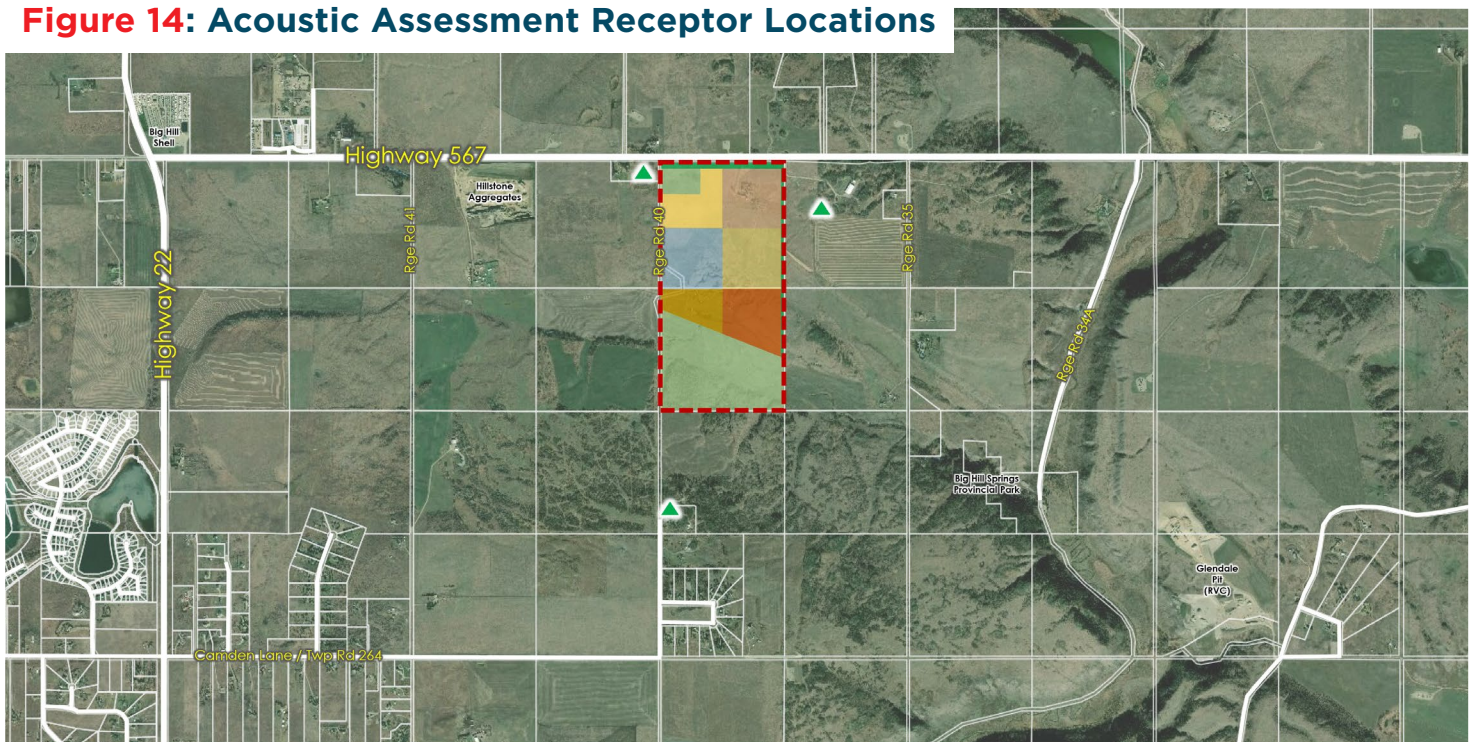
- 16.1** *Mountain Ash shall provide an Air Quality Management Plan and Monitoring Program at the development permit stage in support of each operational phase.*
- 16.2** *Mountain Ash shall undertake specific measures to control dust generated by aggregate operations within the MSDP area as follows:*
- *Shroud the crusher and conveyor drops;*
 - *Locate the crusher at least 190 m from the east site boundary and 140 m from the west site boundary in accordance with the recommendations of the Air Quality Assessment, 2020;*
 - *Paving the portion of Rge Rd 40 from Hwy 567 to the main entrance to the site;*
 - *Implement dust suppression via application of purchased water and/or calcium chloride on all driving surfaces and operating areas within the MSDP on as as needed basis;*
 - *Lowering maximum speed limits to 30 km/hr within the site;*
 - *Surface roughening within the site to create windrows within open areas;*
 - *Maintaining landscaped areas adjacent to Hwy 567 and Rge Rd 40;*
 - *Ensuring all topsoil berms/stockpiles are vegetated with an AESRD approved grass seed mixture; and*
 - *Suspending aggregate operations during high-wind events.*
- 16.3** *Mountain Ash shall monitor air quality at the perimeter of the MSDP area to ensure compliance with the Canadian Ambient Air Quality Standards (CAAQS) and Alberta Ambient Air Quality Objectives (AAAQO).*
- 16.4** *Mountain Ash shall provide a 24-hour number for neighbours within the immediate vicinity to report issues with dust relative to aggregate operations within the MSDP area.*

17.0 Noise Mitigation

Rocky View County does not have a standardized method for conducting aggregate operation noise measurements. However, the County regulates noise nuisance through the Noise Control Bylaw (C-5772-2003) which states that no person shall “make, continue, cause, or allow to be made or continued any excessive, unnecessary, or unusual noise of any type” and that noise must be “minimized as much as practicable.” The Noise Control Bylaw does not prescribe quantitative limits for noise emissions.

Mountain Ash prepared an Acoustic Assessment in support of this Master Site Development Plan to assess the potential sound egress from the proposed aggregate operation in relation to surrounding noise sensitive receptors. As illustrated on **Figure 14: Acoustic Assessment Receptor Locations**, sound monitoring was undertaken at three (3) adjacent locations to provide a good representation of the existing acoustic environment for the variety of surrounding receptors and to determine the operational sound level assessment criterion for each noise sensitive receptor. The monitoring was undertaken over multiple days, inclusive of a weekend period. The predominant sound source at each monitoring locations was road traffic sound from Highway 567 and local residential sound, with occasional sound from the active Hillstone Aggregates operations, but such sounds were not dominant.

Figure 14: Acoustic Assessment Receptor Locations



▲ Noise Receptor Locations

Aggregate Operations

Sound propagation modelling employed to prepare the Acoustic Assessment predicts that the operational sound at the nearest noise sensitive receptors would be below the criteria for all phases with inclusion of appropriate acoustic mitigation and best practice. As required by the County's Noise Control Bylaw, through the noise impact control measures identified, noise emissions would be minimized as much as practicable. The results of this analysis indicate that noise generated within the MSDP area will be at or below 65 decibels, measured at the property line and at the nearest adjacent dwellings.

POLICIES:

- 17.1 An updated Noise Impact Assessment and Noise Mitigation Plan shall be submitted at the development permit application stage in support of each operational phase to demonstrate that aggregate operations will comply with the Alberta Energy Regulator's "Directive 038".***
- 17.2 Mountain Ash shall maintain noise levels generated by the operation at or below 65 decibels, to be measured at the perimeter of the MSDP area. This standard, recommended for Rocky View County by the Alberta Sand & Gravel Association (ASGA), reflects the City of Calgary's daytime noise limit for residential areas.***
- 17.3 To mitigate egress of sound from the aggregate operation, Mountain Ash will install a 3m earth berm along the northern boundary of the site, install acoustic shrouds on the crusher unit, and ensure all equipment operating within the site are equipped with white noise/broadband reverse alarms.***
- 17.4 Mountain Ash shall provide a 24-hour number for neighbours within the immediate vicinity to report issues with noise relative to aggregate operations within the MSDP area.***
- 17.5 Mountain Ash shall ensure the placement of the crusher shall respect a minimum 100m buffer from the site boundary in order to control the egress of sound from the pit relative the nearest noise sensitive receptors.***
- 17.6 Mountain Ash shall provide a 24-hour number for neighbours within the immediate vicinity to report issues with noise relative to aggregate operations within the MSDP area.***

18.0 Habitat Preservation

As illustrated on **Figure 7: Development Concept**, a significant portion of the SW 31 will not be disturbed and will be left in a natural state to respect the environmental integrity of the valley feature that traverses the site from northwest to southeast. Additionally, the existing wetlands situated within the northwest corner of NW 31 will be retained and are not expected to be disturbed pursuant to the mining and development sequencing plan contemplated by this MSDP.

POLICIES:

- 18.1** *An updated Biophysical Impact Assessment shall be submitted at the development permit application stage in support of each operational phase.*

- 18.2** *The existing valley feature within the SW 31 and the existing wetlands situated within the northwest corner of the NW 31 will not be disturbed, as illustrated on Figure 7: Development Concept.*

Aggregate Operations

19.0 Sediment & Erosion Control

Mountain Ash will implement appropriate erosion & sediment control techniques during aggregate operations and site reclamation activities. Detailed erosion & sediment control plans for each operational phase will be prepared in support of each development permit application.

POLICIES:

- 19.1** *An Erosion & Sediment Control Plan shall be submitted at the development permit application stage in support of each operational phase.*

20.0 Weed Management

Mountain Ash will inspect the MSDP area for noxious and restricted weeds as defined by the Weed Control Act and regulations and applicable Rocky View County Land Use Bylaw regulations. Herbicide may be applied to weeds as controlled under the Provincial Code of Practice for Pesticides and the Environmental Code of Practice for Pesticides. Summit Pit will engage with the RVC Agricultural Fieldman on soil handling and weed control management techniques employed during operations.

POLICIES:

- 20.1** *A Weed Control Plan shall be submitted at the development permit application stage in support of each operational phase.*
- 20.2** *Mountain Ash shall undertake weed control during operation and reclamation as directed by the Weed Control Act and the Rocky View County Land Use Bylaw*

21.0 Post-Mining Reclamation

Reclamation will be ongoing and continuous throughout the life of the project to maximize the amount of land under agricultural production during pit operations. The size of open areas being used for operations will be limited to +/- 40 acres at any one time.

As illustrated by **Figure 15: Proposed Reclamation Plan**, the objective of the final reclamation plan is to return the land to an equivalent agricultural land capability after mining operations are complete. Interim and post reclamation land uses will be agriculturally based in keeping with the historical grazing & pasture activities. No ponding or standing water will be left on the landscape as part of the operations.

During reclamation activities, topsoil and overburden materials will be removed from stockpiles and placed over the reclamation zone. The overburden materials will be placed first with topsoil being spread on top to form the surface layer. To optimize efficiencies, efforts will be made to directly apply the overburden and topsoil materials from expansion areas to reclamation zones as opposed to stockpiling the materials in a storage area. Replaced topsoil will be seeded with a vegetation seed mixture as soon as practical to help control erosion and weed growth. Determination of seed mixtures will be based on proper land management practices, such as planned crop rotations and/or grazing schedules. Following seeding, the operator will conduct annual inspections to measure the success of the re-vegetation process.

A monitoring and maintenance plan will be developed and implemented to assess the success of reclamation. This would include field identification and documentation as well as the preparation of a report.

POLICIES:

- 21.1 Reclamation within the MSDP area is expected to occur as generally illustrated on Figure 11: Proposed Reclamation Plan.***
- 21.2 A Reclamation Plan shall be submitted with each development permit application to demonstrate how depleted areas will be returned to their original condition as new mining areas are opened.***
- 21.3 Reclamation of mined areas shall consist of the replacement of salvaged overburden and topsoil with 3:1 side-slopes around the mined areas.***
- 21.4 Seeding of disturbed areas shall include an appropriate seed mix.***



Community Consultation

SECTION D

22.0 Community and Stakeholder Engagement

Due to public health situation related to COVID-19 and restrictions to non-essential public gatherings, Mountain Ash provided alternative methods to learn about the project and get involved rather than hosting an in-person public engagement event. Instead, members of the public were invited to visit the project website to learn about the project and complete an online survey, or they could request to receive hard copy materials where access to the internet was not possible. The objective of the engagement program was to provide information related to the Master Site Development Plan submission, proposed mitigation measures to address potential impacts arising from the proposed development, and to collect public input and respond to questions.

Mountain Ash held an online engagement program for their Summit Pit project from August 10 - August 24, 2020.

In total, 24 surveys were completed by the public. The survey included five questions, three of which were multiple choice while two were open ended. Of the comments received, most focused on the following topics:

- Traffic impacts
- Potential environmental impacts related to air quality, water, and cumulative impacts
- General opposition to aggregate extraction in the area

As part of the Master Site Development Plan application process, Mountain Ash completed various comprehensive technical studies to assess site conditions and develop mitigation measures to address community concerns, included those mentioned in the survey. As such, Mountain Ash believes that the mitigations proposed within the Master Site Development Plan will effectively reduce and/or eliminate concerns related to site operations and would allow them to operate as a good neighbour in the community.

An Engagement Summary Report was prepared to summarize the community and stakeholder engagement process in support of this Master Site Development Plan.

Community Consultations

23.0 Mountain Ash Commitments to Address Local Concerns

Mountain Ash is committed to implementing aggregate operations in a consistent manner that respects the concerns of surrounding neighbors and local stakeholders. As such, Mountain Ash is prepared to enter into a Good Neighbour Agreement with interested neighbours to establish appropriate protocols and procedures to respond to expressed concerns generally as follows:

Table 1: Mountain Ash's Development Commitments

	Expressed Landowner Concern	Mountain Ash's Commitments to Address Concerns
1	Habitat & wildlife	Restrict development disturbances within the valley feature situated within SW 31, limit disturbances within the MSDP area during migratory bird nesting season.
2	Groundwater mitigation	Limit excavation to minimum of 1 m above water table, implement ongoing groundwater monitoring.
3	Dust mitigation	Pave portion of Range Rd 40 from Hwy 567 to main site access, apply water and/or calcium chloride on access routes within the site, implement ongoing air quality monitoring & reporting.
4	Noise mitigation	Reduce operating hours, restrict crushing on Sundays & Holidays, implement ongoing noise monitoring & reporting.
5	Landscaping & screening	Install landscaped berms on perimeter of MSDP area as required, implement dark sky lighting.
6	Respectful aggregate operations	Limit open excavation areas to +/- 40 ac per development phase, reduce operating hours, implement aggregate operations via phased development permit processes, implement progressive reclamation throughout the lifespan of the operation.
7	Ongoing communications & community relations	Provide all landowners & residents situated within +/- 1.6 km of the MSDP area with a direct contact for a Mountain Ash representative and establish a project website to provide general & specific updates for interested stakeholders relative to ongoing aggregate operations within the Summit Pit.

POLICIES:

23.1 Mountain Ash shall work with neighboring residents, business and interest groups to address impacts that may arise from future surrounding aggregate operations should they be approved including trucking, noise, groundwater and dust as summarized in Table 1: Mountain Ash's Development Commitments.

23.2 Mountain Ash shall enter into a Good Neighbour Agreement with interested neighbours, at the development permit stage, to establish appropriate protocols and procedures to respond to expressed concerns on a timely basis.





Implementation

SECTION E

24.0 Land Use Amendment

For Mountain Ash to implement the proposed aggregate operation contemplated by this MSDP, an application to redesignate the subject lands from Agriculture, General District (A-GEN) and Special, Natural Resources (S-NAT) to Direct Control District (DC) must be approved by Council. A site-specific regulation will be established to prescribe general and site-specific development requirements to be implemented via development permit approval conditions. Prescriptions and regulations within the proposed DC district will address matters such as:

- Hours of operation;
- Mining sequencing & staging;
- Development permit renewal intervals;
- Commitments for Mountain Ash to adhere to development considerations such as:
 - » Mining & building setbacks;
 - » Landscaping, lighting, and signage requirements;
 - » Noise, air quality and groundwater monitoring & reporting requirements;
- Commitments for certain updated technical reporting to be provided at the development permit stage; and
- Specific prescriptions to address potential accommodation of other 'complementary' uses that may coincide with aggregate extraction & processing within the MSDP area such as:
 - Accessory buildings;
 - General Agriculture;
 - Communications Facilities (Types A, B & C);
 - Dwelling Unit, accessory to principal use;
 - Home based business (Types I & II);
 - Office;
 - Outdoor Storage;
 - Kennel; and
 - Signage

POLICIES:

24.1 The subject lands will be designated Direct Control District in accordance with the Land Use Bylaw (C-8000-2020).

24.2 The regulations of the Direct Control District shall ensure Mountain Ash's commitments to address concerns from neighbouring properties are appropriately implemented as described in Section 23.0 of this MSDP.

25.0 Development Permit Process

Prior to aggregate operations proceeding within each anticipated mining & sequencing phase, Mountain Ash shall submit a development permit application to the County to address specific matters such as:

- Aggregate operations plan;
- Active mining boundary;
- Transportation infrastructure improvements;
- Stormwater management infrastructure improvements;
- Construction management;
- Erosion & sediment control;
- Landscaping & screening;
- Dust control (air quality);
- Noise control;
- Reclamation;
- Annual reporting requirements to summarize matters such as:
 - » Status of operations;
 - » Dust (air quality) monitoring;
 - » Noise monitoring;
 - » Reclamation activities; and
 - » Good Neighbour Agreement (i.e. a description of complaints expressed from neighbouring landowners & follow up mitigations by the pit operator).

POLICIES:

25.1 Implementation of the Summit Pit is expected to occur in multiple phases in accordance with the County's development permit process.

25.2 The developer acknowledges that new information and/or updates to various plans and technical reporting prepared in support of this MSDP will be provided at the development permit stage to clarify how Mountain Ash will honor its commitments described in Section 23.0 of this MSDP.

26.0 Potential Closure of Range Road 40 Right-Of-Way (ROW)

As illustrated by **Figure 12: Development Phasing & Mining Sequencing Plan**, aggregate excavation is expected to commence in the southeast corner of the MSDP area and progress to the north and then west in a counter-clockwise fashion. As the lifespan of the operation approaches Phase 4, there is merit to consider closing the portion of Rge Rd 40 which extends south of the paved access from Highway 567. Mountain Ash believes it would be prudent to remove the aggregate underlying the Range Road 40 ROW as opposed to mining up to the adjacent setback. Likewise, given the alterations to existing site grades subsequent to excavation, it also would be beneficial to align the post-reclamation elevations between the excavated area and the statutory road allowance to avoid the 'egg carton' effect that would otherwise result.

As such, concurrent with the development permit application for Phase 4, Mountain Ash may submit a road closure application to close the affected portion of Range Road 40. Subsequently, Mountain Ash may pursue appropriate approvals from the County and Alberta Transportation to permit excavation of aggregate within the Rge Rd 40 ROW subject to an Agreement (with terms) to be negotiated as a condition of the associated development permit application.

POLICIES:

- 26.1** *Concurrent with the development permit application for Phase 4, Mountain Ash may apply to close the portion of Range Road 40 ROW extending south of the paved access to the MSDP area for aggregate extraction purposes.*
- 26.2** *Subject to appropriate approvals, Mountain Ash may excavate the aggregate within the ROW subject to an Agreement, with terms, to be negotiated with the County and Alberta Transportation as a condition of the associated development permit.*

27.0 Provincial Approval Process

27.1 Alberta Code of Practice for Pits

Mountain Ash has completed a Master Site Development Plan for Alberta Environment and Sustainable Resource Development (AESRD) in accordance with a Code of Practice registered with Alberta Environment and Sustainable Resource Development.

The COP application has been submitted to AESRD in support of the Summit project. The Code of Practice is a document that requires a gravel pit registration holder to perform certain duties during the life of the pit. Examples of information required which is to accompany a Code of Practice for Pits in Alberta is as follows:

Pit Water Monitoring	Wildlife Considerations
Landowner Contact information	Noise
Reporting Requirements:	End land uses
Contravention Reports	Sequence of Operations
Five Year Reports	Soil Conservation
Final Reclamation Reports	Drainage
Operating Records	Soil Replacement
Reclamation Certification	Re-vegetation
Activities Plan	Weed Control
Full Cost Security	Extraction Setbacks
Depth of Excavation	

POLICIES:

27.1.1 No aggregate operations shall occur within the MSDP area without an approval from Alberta Environment and Sustainable Resource Development (AESRD) in accordance with the requirements of the Code of Practice for Pits.

27.2 Provincial Water Act Approvals

AESRD is also responsible for provincial approvals under the Water Act. Under the Water Act, a Wetland Assessment Impact Report (WAIR) is required in areas where wetlands may be impacted by development. The contents of a WAIR are similar to the requirements of the Biophysical Impact Assessment prepared to support the MSDP and include the need for seasonal surveys of wetlands. These studies will be prepared and submitted to Alberta Environment at the future development permit stages.

POLICIES:

27.2.1 Any proposed disturbances of identified wetlands within the MSDP area shall require approval from Alberta Environment and Sustainable Resource Development in accordance with the requirements of the Provincial Wetland Policy and the Water Act.

27.3 Alberta Transportation Roadside Development Permit

Mountain Ash will require a Roadside Development Permit to be approved by Alberta Transportation prior to operations because the proposed development is within 1,600 m of Provincial Highway 567. Mountain Ash will prepare and submit a roadside development permit application subsequent to the approval of the MSDP and land use amendment, and prior to aggregate activities proceeding within the site.

POLICIES:

27.3.1 No aggregate operations shall occur within the MSDP area without approval of a Roadside Development Permit from Alberta Transportation.

Implementation

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Assessment of Cumulative Aspects of Extraction Activities in the Area

SECTION F

This MSDP includes a strategic policy implementation framework intended to assess & mitigate cumulative impacts relative to considerations such as traffic, noise, air quality, groundwater, visual impacts and public communications. Evaluated within this framework, Mountain Ash is confident that the proposed Summit Pit will not create negative impacts to the lands surrounding the MSDP area.

As illustrated on **Figure 1: Regional Context**, the Summit Pit MSDP is located within an area of the County that is known to contain significant aggregate resources. Provincial and municipal land use policies encourage the responsible removal of these resources. As such, it is reasonable to assume additional proposals for natural resource extraction will be advanced by other aggregate operators to pursue similar approvals affecting other parcels within the surrounding area.

On July 11th, 2017, Rocky View County Council directed Mountain Ash Limited Partnership, Lafarge Canada and McNair Sand & Gravel to prepare coordinated development policies in each of their respective MSDP's to:

- I. Identify consistent minimum standards that all operations will adhere to;
- II. Establish joint measures to minimize and monitor cumulative impacts on the local area, including identifying acceptable mitigation strategies for affected properties within a mile and a half from the property lines of the gravel pits; and
- III. Review and adapt transportation access and egress to Highway 567 to maximize safety and result in a design that would allow loaded gravel trucks to maximize their speed to safely merge into Highway 567's lanes as determined by RVC engineering and Alberta Transportation.

Each respective land use application was approved with MSDP's that indeed included development policies to align various operating standards, monitoring programs and infrastructure upgrades.

On September 16th, 2019, an Alberta Court of Queen's Bench decision (Docket 1701-12053) set aside RVC Council's land use approval for the previously mentioned aggregate producers. Although RVC is appealing this decision of the Courts, Mountain Ash is not certain that the County will be successful in this regard.

Although Mountain Ash has decided to pursue a new application for MSDP and Land Use Amendment, they continue to honor and respect the fundamental motivation of Council's July 11th, 2017 direction. That is, to establish a policy framework that facilitates collaboration between Mountain Ash and other existing/future aggregate operations in the Big Hill Springs area to cumulatively manage the effects of multiple aggregate operations within the same general location.

Accordingly, Mountain Ash anticipates the County will implement the following policy framework at the land use and/or development permit stage to facilitate a coordinated approach amongst all existing and proposed aggregate operations within the Big Hill Springs area with respect to operating best practices, transportation improvements, landscaping and visual screening infrastructure, noise, air quality, and groundwater mitigations, and project communications.

28.1 Coordination of Operating Best Practices

Mountain Ash is committed to operating The Summit Pit in a manner that limits cumulative negative impacts to surrounding residents.

As such, Mountain Ash is committed to the following:

- Restricting operating hours within the MSDP area as follows:
 - Monday to Friday: 7am to 7pm
 - Saturday: 7am to 5pm
 - Sundays and/or Statutory Holidays: No operations.
- Working collaboratively with other approved aggregate operators to align operating best practices (where possible and practical) with the overall objective of limiting potential nuisances to surrounding residents.

POLICIES:

28.1.1 Mountain Ash will implement operating best practices within the subject lands as described within this MSDP.

28.1.2 Mountain Ash will work collaboratively with other approved aggregate operators within the Big Hill Springs area to collectively align operating best practices (where possible and practical) with the overall objective of limiting nuisances to surrounding residents.

28.2 Coordination of Transportation & Traffic Safety Considerations

Mountain Ash is committed to implementing appropriate transportation improvements within and adjacent to the MSDP area with the overall intent of limiting cumulative impacts to surrounding residents.

As such, Mountain Ash is committed to the following:

- Working collaboratively with the County and Alberta Transportation to design and implement appropriate access from Highway 567 to ensure aggregate operations do not negatively affect the function and safety of the municipal and regional transportation network.
- Implementing operating measures to ensure that all vehicles leaving the MSDP area do so in a state that will prevent aggregate materials and other detritus from being deposited onto the roadway and/or highway network.
- Working collaboratively with other approved aggregate producers to jointly assess transportation impacts throughout the lifespan of their project, and where possible and practical, consider the following:

- Sharing appropriate traffic data to assist other operators to prepare their Traffic Impact Assessments in support of their projects.
- Aligning common highway access points for multiple aggregate operations;
- Implementing joint funding arrangements to construct highway intersection upgrades where such improvements provide a proportional benefit;
- Coordinating the design of project lighting to ensure all lighting within project areas are fully compliant with Dark Sky Guidelines.
- Coordinating implementation of signage and other roadside indicators to clearly identify specific project areas and promote appropriate way finding between multiple pit areas; and
- Reducing speed limits (subject to Alberta Transportation).
 - Working with other approved aggregate operators in the Big Hill Springs area to:
 - Educate trucking contractors to ensure that queuing will not be tolerated on the highway.
 - Collaborate with local enforcement authorities to ensure queuing activities are monitored and appropriately enforced.
 - Align regional truck haul routes and liaise with Alberta Transportation and the County accordingly.
 - Participate in the ASGA Truck Registry Program and promote the use of in-vehicle monitoring systems within all commercially licensed trucks servicing local aggregate operations.

POLICIES:

28.2.1 Mountain Ash will implement transportation upgrades and related operating procedures as described within this MSDP.

28.2.2 Mountain Ash shall prepare an update to the Traffic Impact Assessment prepared in support of this MSDP, at each development permit stage, to appropriately consider and assess future ambient traffic conditions.

28.2.3 Mountain Ash will work collaboratively with other approved aggregate operators within the Big Hill Springs area (where possible and practical) to share appropriate technical information, proportionally fund and construct transportation improvements, and establish and implement ongoing operating practices with the overall objective of mitigating cumulative effects relative to the operation and safety of the municipal and regional transportation networks.

28.3 Coordination of Landscaping & Visual Screening Improvements

Mountain Ash is committed to working with other aggregate operators within the Big Hill Springs area to coordinate the design and function of landscaped screening berms with the overall objective of screening the aggregate operations from view of the public road/highway frontages.

As such, Mountain Ash is committed to the following:

- Coordinating the design of landscaped screening berms where two (or more) aggregate operations abut one another.
- Coordinating the maintenance program for landscaped screening berms where two (or more) aggregate operations abut one another.

POLICIES:

28.3.1 Mountain Ash will construct and maintain landscaped screening berms within the subject lands as described within this MSDP.

28.3.2 Mountain Ash will work collaboratively with other approved aggregate operators within the Big Hill Springs area to design and maintain landscaped berms (where possible and practical) with the overall objective of screening aggregate operations from the public road/highway frontages.

28.4 Coordination of Noise, Air Quality and Groundwater Mitigations

Mountain Ash is committed to working with other aggregate operators within the Big Hill Springs area to coordinate practices and procedures to mitigate concerns relative to noise, air quality and groundwater with the overall intent of limiting cumulative impacts to surrounding residents.

As such, Mountain Ash is committed to the following:

Noise:

- Restricting noise generated within the site based on industry best practices and the Rocky View County Noise Control Bylaw.
- Restricting noise levels to no more than 65 decibels within the MSDP area, to be measured at noise receptors installed at the project property line.
- Providing advanced notifications to adjacent residents when unique operating conditions might be expected to generate noise in excess of 65 decibels.
- Installing muffler silencers or back-up strobe lights on all equipment operating on-site.
- Enclosing aggregate crushing equipment.

- Installing noise monitoring stations upwind, centrally located and downwind of pit operations.
- Engaging a third party to record data from noise monitoring stations on a 'real time' basis.
- Establishing protocols & procedures to share data with other aggregate operators and local stakeholders.

Air Quality:

- Implementing dust control measures based on industry best practices including, but not limited to, paving access roads from the Highway to the main site access, apply calcium chloride and/or water on all driving aisles within each pit, and lower speed limits within project boundaries to 30 km/hr.
- Limiting the amount of open excavations to 3 40 ac at a time.
- Implement progressive reclamation activities as soon reasonably possible following depletion of the aggregate resources within each development phase.
- Enclosing aggregate crushing equipment.
- Implementing dust control measures on all unpaved haul routes and at all aggregate transfer points.
- Implementing daily inspections to ensure dust control measures are in place.
- Suspending pit operations in high wind conditions.
- Developing procedures and protocols to ensure trucks leaving an operation is appropriately securing and covering its load.
- Installing dust monitoring stations upwind, centrally located and downwind of the pit operation.
- Engaging a third party to record data from dust monitoring stations on a 'real time' basis.
- Establishing protocols and procedures to share data with other aggregate operators and local stakeholders.

Groundwater:

- Ensuring all excavation activities are prohibited closer than 1 m to the depth of groundwater.
- Installing groundwater monitoring wells upstream centrally located and downstream of pit operations.
- Engaging a third party to record data from groundwater monitoring wells on a 'real time' basis.
- Establishing protocols & procedures to share data with other aggregate operators and local stakeholders.

POLICIES:

28.4.1 Mountain Ash will establish ongoing monitoring programs relative to noise, air quality and groundwater as described within this MSDP.

28.4.2 Mountain Ash shall update the Acoustic Assessment, Air Quality Assessment and Hydrogeological Impact Assessment prepared in support of this MSDP, at each development permit stage, to appropriately consider and assess future ambient noise, air quality and groundwater conditions.

28.4.3 Mountain Ash will work collaboratively with other approved aggregate operators within the Big Hill Springs area (where possible and practical) to share associated monitoring data and align appropriate operating practices with the overall objective of mitigating cumulative affects relative to noise, air quality and groundwater.

28.5 Coordination of Ongoing Communications

Mountain Ash is committed to working with other aggregate operators within the Big Hill Springs area to coordinate operating best practices within the MSDP area with other natural resource extraction projects approved by the County with the overall intent of limiting cumulative impacts to surrounding residents.

As such, Mountain Ash is committed to the following:

- Establishing a project website to be updated regularly.
- Publish results of the ongoing noise monitoring, air quality monitoring and groundwater monitoring.
- Establishing clear expectations regarding how and when expressed complaints are to be addressed.
- Working collaboratively with other approved aggregate producers to align protocols and procedures regarding project related public communications.

POLICIES:

28.5.1 Mountain Ash will implement ongoing project communications relative to The Summit Pit to ensure adjacent residents and stakeholders are kept apprised of ongoing natural resource extraction operations as described within this MSDP.

28.5.2 Mountain Ash will work collaboratively with other approved aggregate operators within the Big Hill Springs area to collectively align communication protocols and procedures (where possible and practical) with the overall objective of ensuring local residents and stakeholders are kept apprised of ongoing aggregate operations in the area.

Supporting Technical Documents

(submitted under separate cover)

- Hydrogeological Impact Assessment, SLR Global Environmental Solutions, January 2020
- Conceptual Stormwater Management Plan, SLR Global Environmental Solutions, January 2020
- Biophysical Impact Assessment Report, SLR Global Environmental Solutions, January 2020
- Wetland Assessment Impact Report, SLR Global Environmental Solutions, February 2020
- Visual Appraisal, SLR Global Environmental Solutions, February 2020
- TIA Letter Update, Watt Consulting Group, March 2020
- Acoustic Assessment. SLR Global Environmental Solutions, May 2020
- Air Quality Assessment in Support of the Summit Pit Application, May 2020
- Transportation Impact Assessment, Watt Consulting Group, August 2014
- Community and Stakeholder Engagement Summary, September 2020

OCT 15
20
20

Master Site Development Plan

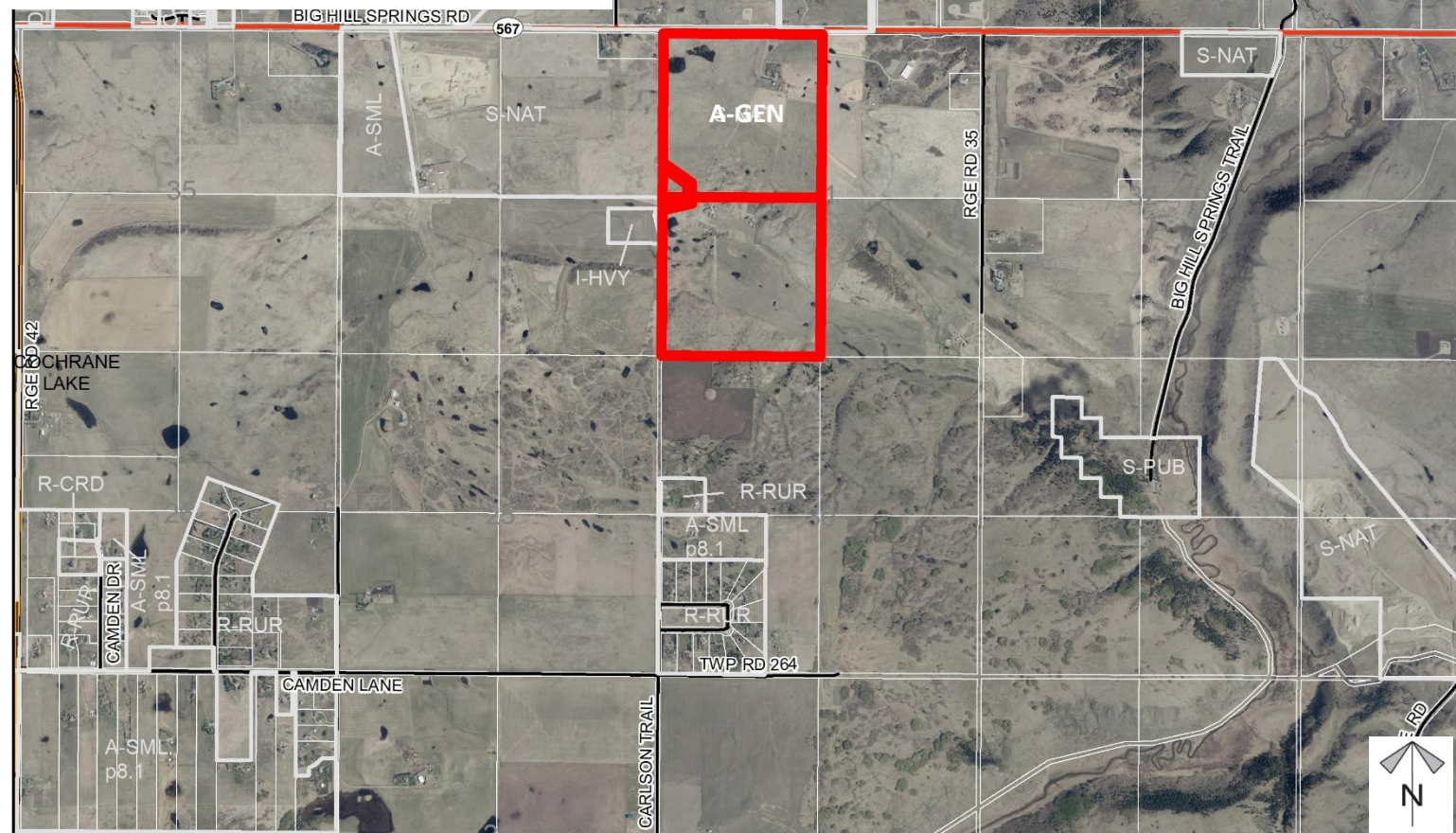
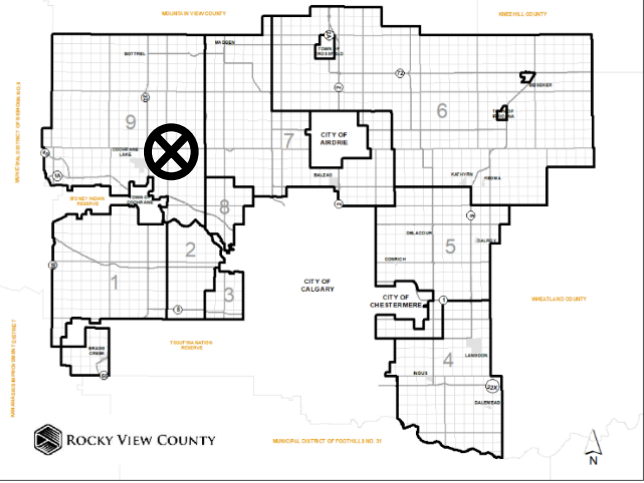
The Summit Pit
DRAFT for Public Hearing Purposes



MOUNTAIN ASH
• LIMITED PARTNERSHIP •



Location
& Context





Development Proposal:

To redesignate the subject lands from Agricultural, General District to Direct Control District to accommodate aggregate extraction.

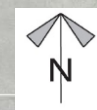
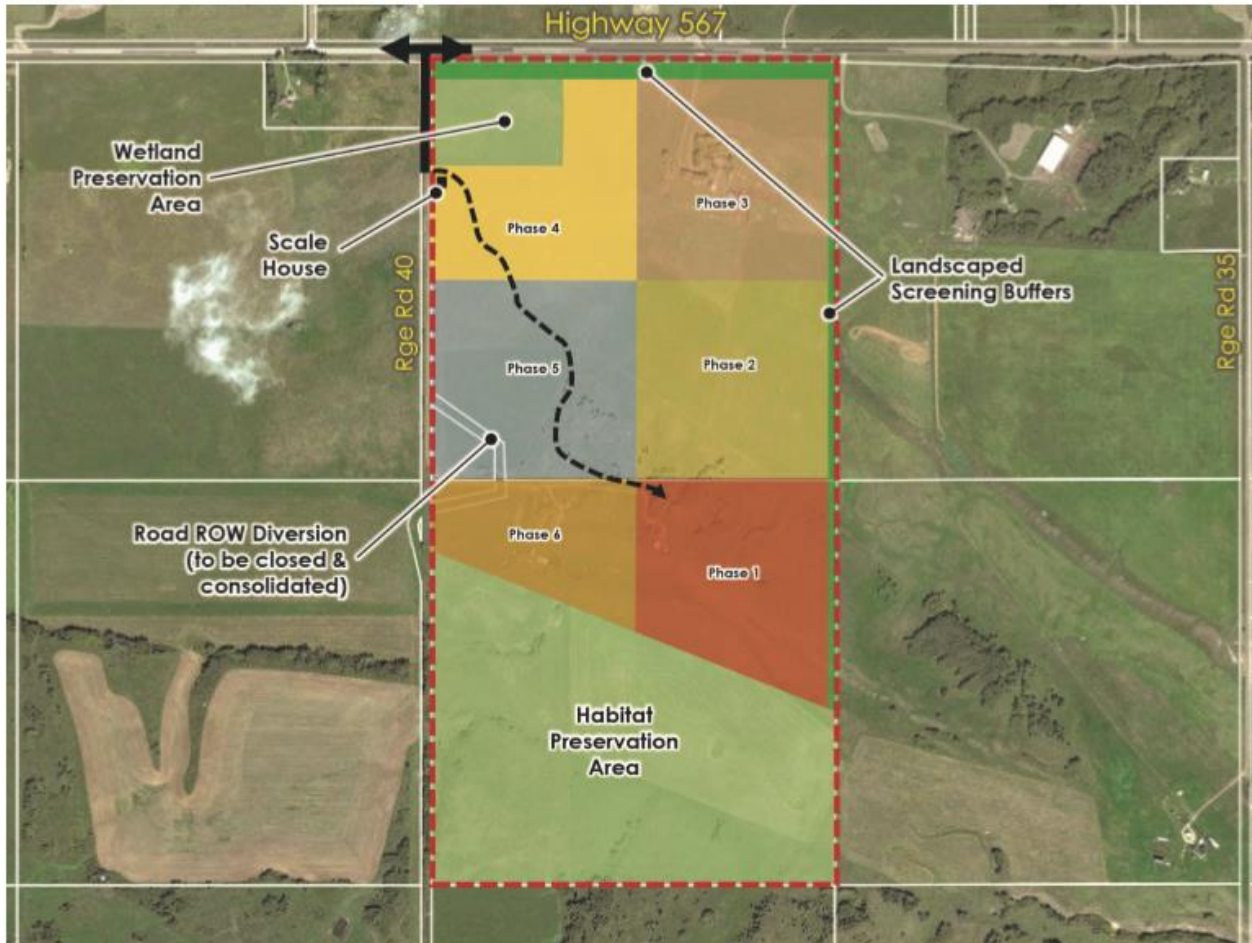


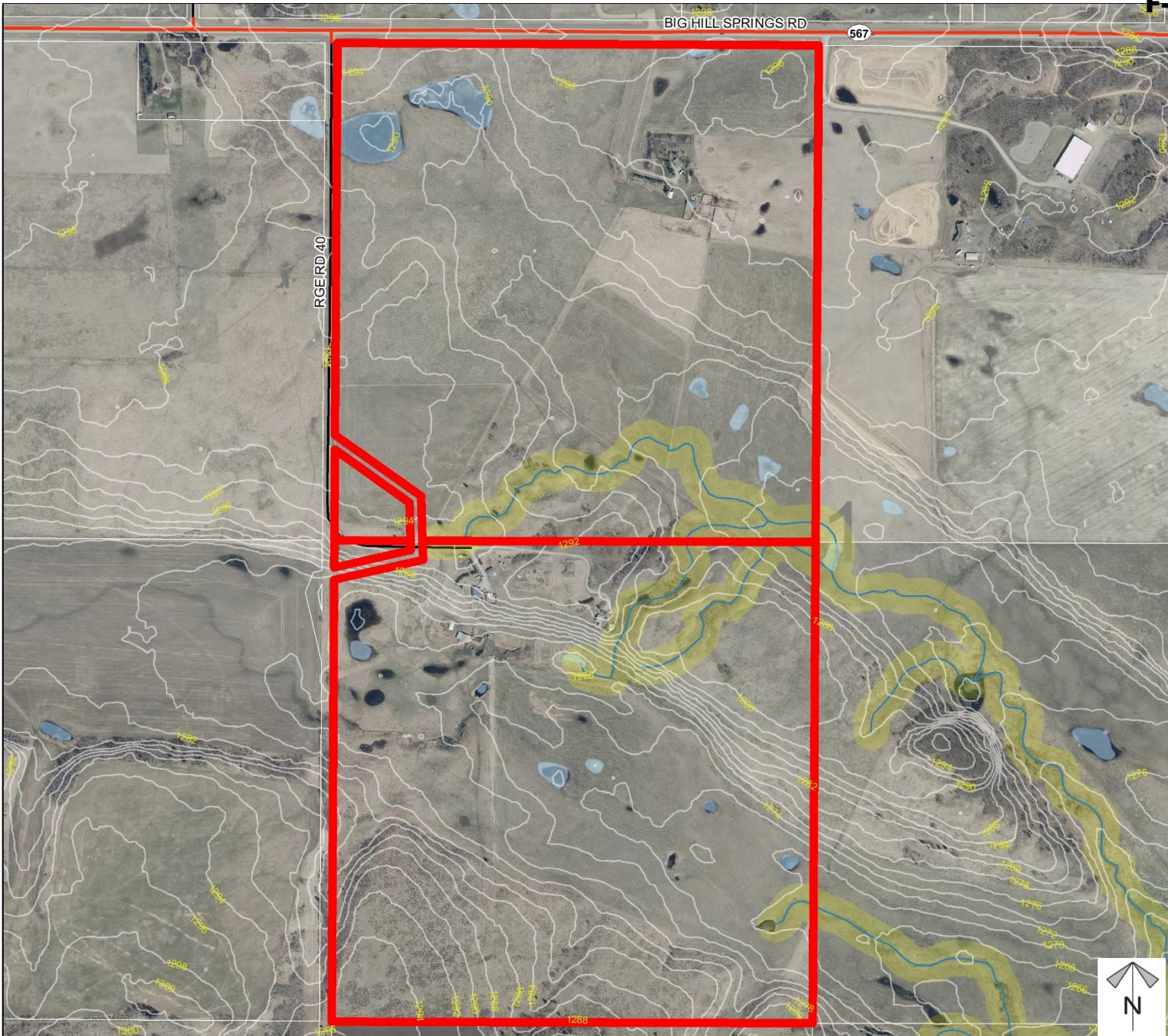
Figure 7: Development Concept



MSDP Proposal:
To adopt the Summit Pit
Master Site
Development Report to
provide for aggregate
extraction on the site.



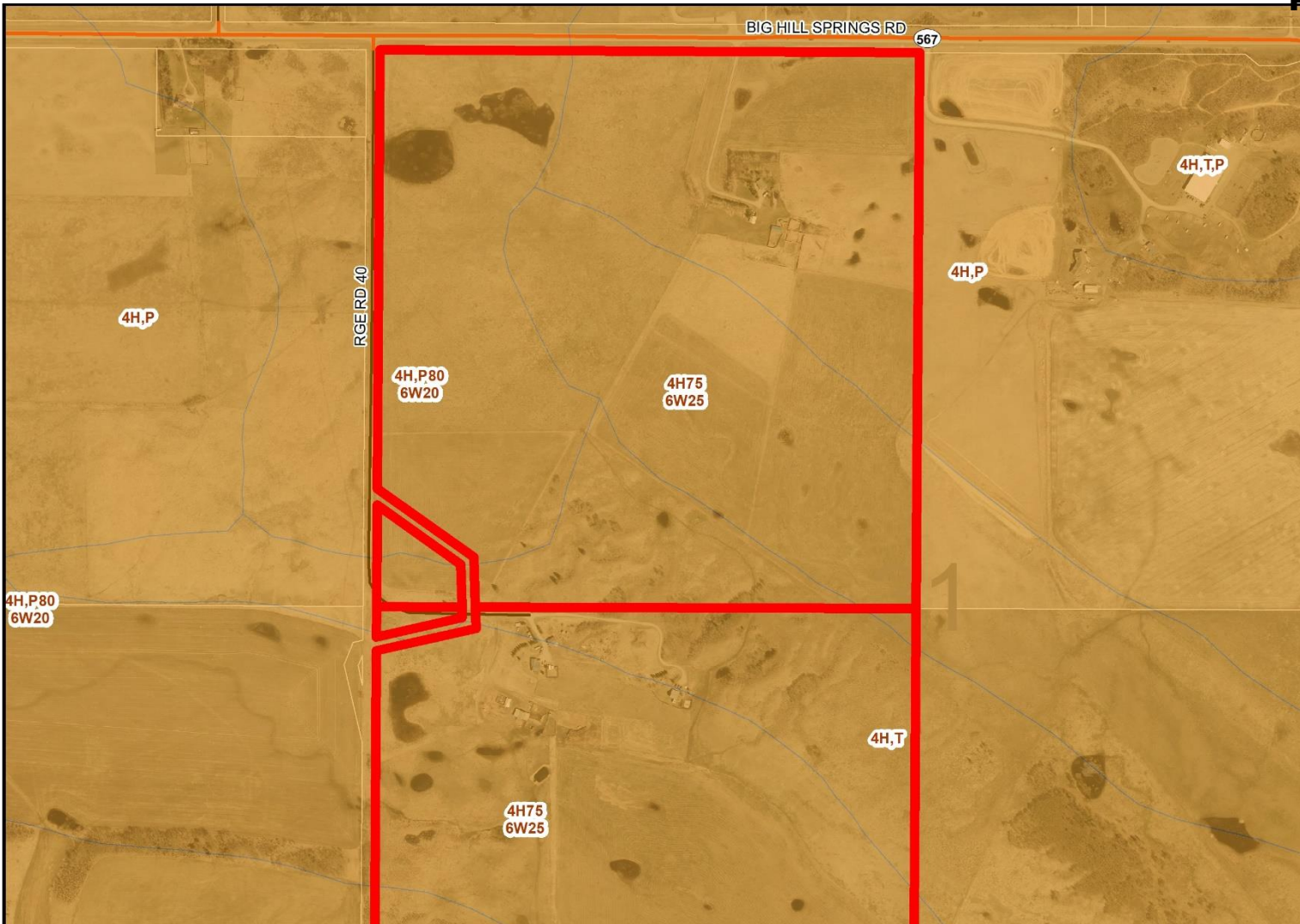
Environmental



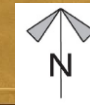
- Subject Lands
- Contour - 2 meters
- Riparian Setbacks
- Alberta Wetland Inventory
- Surface Water

Division: 9
Roll: 06731002/1004
File: PL20200034
Printed: November 3, 2020
Legal: SW/NW-31-26-03-
Page 415 of 726

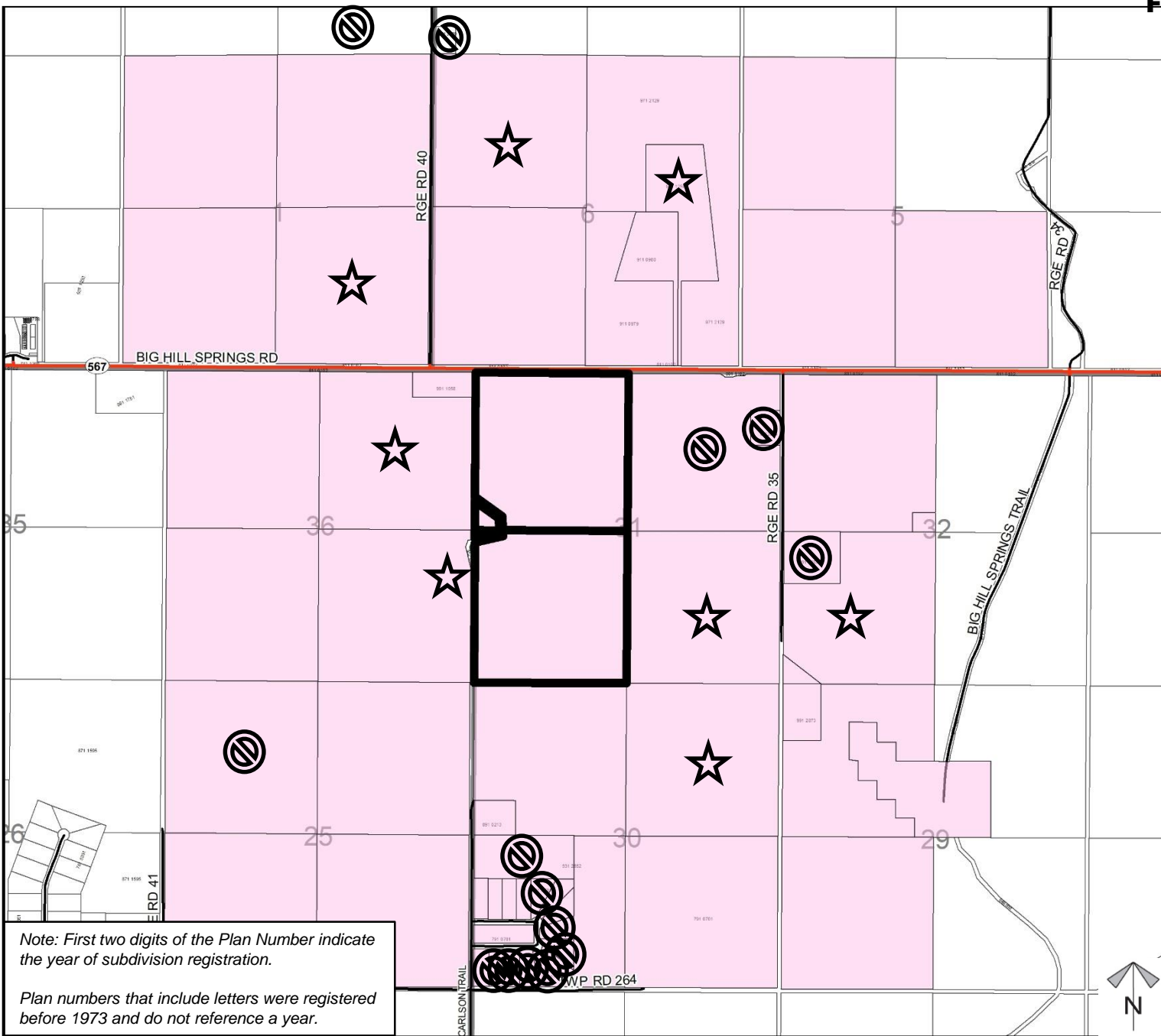
Soil
Classifications





LAND CAPABILITY CLASSIFICATION LEGEND		
CLI Class	Limitations	
1 - No significant limitation	B - brush/tree cover	N - high salinity
2 - Slight limitations	C - climate	P - excessive surface stoniness
3 - Moderate limitations	D - low permeability	R - shallowness to bedrock
4 - Severe limitations	E - erosion damage	S - high solidity
5 - Very severe limitations	F - poor fertility	T - adverse topography
6 - Production is not feasible	G - Steep slopes	U - prior earth moving
7 - No capability	H - temperature	V - high acid content
	I - flooding	W - excessive wetness/poor drainage
	J - field size/shape	X - deep organic deposit
	K - shallow profile development	Y - slowly permeable
	M - low moisture holding, adverse texture	Z - relatively impermeable



Landowner Circulation Area



Legend

- Support 
- Opposition 

Note: First two digits of the Plan Number indicate the year of subdivision registration.

Plan numbers that include letters were registered before 1973 and do not reference a year.

PLANNING POLICY

TO: Council
DATE: March 2, 2021 **DIVISION:** All
TIME: Morning Appointment
FILE: 1013-136 **APPLICATION:** N/A
SUBJECT: Adoption of proposed Bylaw C-8090-2020 (New Municipal Development Plan)

POLICY DIRECTION:

Direction for the preparation of this Plan came from the Terms of Reference (TOR) adopted by Council on January 22, 2019.

EXECUTIVE SUMMARY:

On February 16, 2021, after closing the public hearing, Council tabled Bylaw C-8090-2020 until March 2, 2021. This was to allow for the further consideration of potential amendments to the draft Municipal Development Plan (the Plan). These amendments, submitted by Councillors and Administration, are set out within Attachment 'D' alongside commentary from Administration on the amendments.

The Municipal Development Plan will outline the vision for Rocky View County from a planning and development perspective and provide direction for how and where the County will grow over the next 20 years. This Plan is the result of a review of the existing Municipal Development Plan, being the County Plan, which was adopted in October 2013.

The approved TOR, the *Municipal Government Act* (MGA) and the Interim Growth Plan (IGP) (adopted October 4, 2018) provide a framework for development of the Plan. The goal of the Plan review was to accommodate new growth responsibly, and to provide an important decision making tool for Council, Administration, and stakeholders.

In support of the Plan review, public engagement was accomplished through various methods to ensure comprehensive and meaningful feedback was collected and utilized throughout the development of the Plan. In accordance with the IGP, a structured intermunicipal engagement plan was also implemented to obtain input from adjacent municipalities; despite efforts by Administration to collaborate with adjacent municipalities on the draft MDP, The City of Calgary, City of Airdrie, and Town of Cochrane have outstanding concerns that Administration has been unable to address thus far.

The proposed Plan:

- Identifies principles for growth, and proposes a range of policies to guide land use and county-wide matters such as infrastructure, recreation, and policies to implement and monitor the Plan;
- Updates the vision to align with the County's Strategic Plan and provides a framework to manage growth responsibly;
- Provides a framework for the County to operate in accordance with the MGA;
- Is consistent with the goals and policies of the IGP;
- is consistent with the goals and policies of relevant intermunicipal development plans/accords;
- Proposes new employment growth areas, and therefore would contribute to achieving the assessment diversification goals of the County.

Administration Resources

Dominic Kazmierczak, Planning Policy

ADMINISTRATION RECOMMENDATION:

Administration recommends approval in accordance with Option #1.

BACKGROUND:

The Plan has been prepared in accordance with Section 632 of the MGA, which outlines the requirements of the content of Municipal Development Plans.

Direction for the preparation of this MDP came from the TOR adopted by Council on January 22, 2019. It has been over seven (7) years since the County Plan (current MDP) was adopted (October 2013). In that time, the County has continued to grow, and conditions have changed.

Rocky View County has grown by about 15,000 people in the last 20 years, and will continue to grow. The Plan sets the vision for how to accommodate this growth responsibly, serving as an important decision-making tool for Council, County Administration, and stakeholders. Specific goals of the MDP review included:

- Updating the vision, policies, and actions of the 2013 County Plan;
- Describing the County's preferred direction with respect to growth areas, land use, infrastructure investments, business development, and provision of County services;
- Providing policy direction and planning tools regarding land use, transportation, infrastructure, and recreation and community services;
- Informing County bylaws, policies, programs, and investments;
- Establishing a framework for the County to work with regional partners, stakeholders, and communities to find mutually beneficial solutions to planning and development challenges; and
- Helping residents and landowners understand how their land may be used now and in the future.

Content and direction of the Plan was informed by resident and stakeholder feedback, a development suitability analysis, Council workshops, collaboration with neighboring municipalities and regional partners and all relevant provincial legislation, regional and statutory plans, together with non-statutory plans and studies.

PLAN PREPARATION:

The Plan was prepared through a collaborative planning process that began in summer 2019 and resulted in a draft Plan in fall 2020. Landowners, stakeholders, agencies such as Alberta Transportation and regional partners were involved throughout the Plan's development to provide feedback and input into the Plan's vision, principles, and policies.

To accommodate future growth across the County, the new Plan must identify key areas for new residential, commercial, and industrial development, while also protecting natural landscapes, the rural character of the County, and future economic opportunities. This Growth Framework was developed by reviewing current plans and policies, and market patterns, which together informed the Growth Suitability Model.

The Growth Suitability Model, one of the three inputs into the Growth Framework, uses existing spatial data and analysis to identify areas that are suitable to support development and growth. This model was used to inform growth scenarios and the final Plan. The Growth Suitability Model consists of two components: a Preservation Strategy, and a Development Strategy. The Preservation Strategy identifies important



landscapes that may not be appropriate for additional development, and the Development Strategy was used to determine suitability of an area for additional new development.

These models were informed by review and knowledge from landowners, residents, and stakeholders as part of the engagement process

PUBLIC ENGAGEMENT:

The County undertook public engagement over three (3) phases; the focus of each phase is identified below:

- August and September 2019 - Open houses were held around the County, supported by online materials, to gain feedback on creating a vision for the Plan and key principles. The County received 585 survey responses during this engagement phase.
- November 2019 - Further open houses were held, again supported by online materials, to obtain feedback on the draft vision, growth strategies, and development patterns. The County received 294 survey responses in this phase.
- May and June 2020 - The County released the draft MDP for public comments. Due to the COVID-19 pandemic, engagement was undertaken online. Engagement specifically focused around land use policies including growth areas, hamlet development, commercial and industrial development, and other natural resource development. The County received 370 survey responses in this phase.

PLAN CONTENT:

The result of the planning process was a vision and set of guiding principles for future decision making. The vision defines the ideal state for the County, while the six guiding principles; relating to responsible growth, economic diversification, community development, agriculture, the environment, and partnerships; add further detail about the elements and actions required to achieve the vision.

Land Use Policies

The Plan's land use policies guide development throughout the County and identify growth areas for residential, commercial, industrial, and institutional development. These growth areas, presented as the Plan's Growth Concept, provide a planning framework that aims to balance sustainable development with providing a high quality of life and diverse range of residential and economic opportunities.

The policies in this section provide a framework to consider and decide on new or amended area structure plans, local plans, land use and subdivision applications.

County-Wide Policies

County-wide policies within the Plan provide high-level direction on County services, operations, and infrastructure. They are intended to improve County services, promote economic diversification, enhance quality of life, and strengthen community identity.

The policies in this section provide a framework for balancing decisions related to: financial sustainability, the transportation network, natural resource development, supporting agriculture, protection of the environment, provision of utility services, solid waste management, creating and maintaining public spaces, promoting services and partnerships, and advancement of recreation, arts, and culture.

Plan Implementation

Implementation of the Plan would occur through several mechanisms and processes, including:

- On-going administration of the development review process, and periodically reviewing and amending area structure plans;



- Carrying out next steps required to implement the vision, guiding principles, and objectives of the MDP; and
- Collaborating with neighbouring municipalities on planning and development related matters.

Table 02: Implementation Actions in the Plan includes a number of short-term actions that should be undertaken to effectively implement the Plan and guarantee its on-going success.

Implementing the Plan would require a commitment to developing plans, strategies, and regulations that are consistently monitored to ensure they are effective as well as fiscally responsible. Section 4.3 in the Plan sets out Performance Measures to ensure development is being effectively guided.

POLICY DIRECTION AND SUPPORT:

Legislative and policy direction for the Plan is provided in the *Municipal Government Act*, IGP, and within Intermunicipal Development Plans (IDP) adopted in partnership with several municipalities adjoining the County boundary.

Calgary Metropolitan Region Board Interim Growth Plan

The proposed Plan was evaluated in accordance with the Calgary Metropolitan Region Board's (CMRB's) Interim Growth Plan (IGP).

The Plan has been drafted to align with the three principles of the IGP, which are to:

1. Promote the integration and efficient use of regional infrastructure;
2. Protect water quality and promote water conservation; and
3. Encourage Efficient Growth and strong and sustainable communities.

A key focus of the MDP is to ensure the sustainable use of land, and the policies contained within the draft aim at preserving agricultural lands while promoting more efficient development patterns within the identified growth areas. Concurrently, the Plan includes flexibility for new growth opportunities to meet the diverse residential and business needs within the County.

The Plan's policies in relation to residential and employment areas ensure that important regional matters such as transit, source water protection, and flood risk management are adequately addressed both within the IGP criteria for relevant development types (intensification and infill, country residential, expansion of settlement areas and employment areas), and in the IGP's region-wide policies. The growth strategy also seeks to promote appropriate land uses around the identified regional corridors to maximize benefits, while also protecting the integrity of these corridors.

With respect to Policy 3.2.2 of the IGP relating to collaboration, the County undertook a thorough and structured engagement process with adjacent municipalities and relevant agencies. Specific details on intermunicipal discussions and outcomes are detailed in the sections below.

Overall, Administration considers that the draft Plan is in full accordance with the policies of the IGP.

Intermunicipal Development Plans

In preparing the draft Plan, the County was guided by all Intermunicipal Development Plans and Accords previously adopted by Council. Policies relating to growth corridors, collaboration and referral, and a range of other land use matters contained within those documents were considered, and the Plan has ensured compatibility with each of these statutory and non-statutory documents. Each adjacent municipality was circulated on the draft Plan in accordance with requirements of the MGA, and where appropriate, in accordance with the relevant statutory plan. A summary of the intermunicipal engagement undertaken by the County is set out below, together with the outcomes of that collaboration.

INTERMUNICIPAL COLLABORATION:

Intermunicipal collaboration commenced in early 2020; initial workshop meetings were held with several adjacent municipalities in February and March 2020 to introduce the project timeline and approach, and to gain initial input on any items to be addressed through collaboration. Once a draft document had been developed and further public engagement undertaken, the County circulated the draft to all adjacent municipalities and First Nations for input and comment, alongside circulation to provincial agencies and other statutory bodies; this occurred in November 2020.

Following feedback from a number of municipalities and agencies, the County revised the Plan appropriately and sent the revised draft out to municipalities and stakeholders in December 2020, together with responses to those parties where suggested amendments had not been incorporated into the Plan.

Of the adjacent municipalities that responded, the City of Chestermere, Town of Crossfield, Mountain View County, and Wheatland County raised no concerns. However, the municipalities of the City of Airdrie, The City of Calgary, and the Town of Cochrane all retain outstanding concerns with the draft Plan. The full comments of circulated adjacent municipalities are contained within Attachment 'B'; however, a summary of the key concerns raised is set out below.

City of Airdrie

- The City states that it could support the proposed Plan with the formalization of a Joint Planning Area (JPA) or under the terms of an Intermunicipal Collaborative Framework (ICF). It notes that in the case of a JPA, this would likely comprise an adopted Context Plan and associated agreements, while for an ICF, a Memorandum of Understanding of mutually acceptable terms.
- While there is an appreciation of the desire for flexibility in planning growth areas in the draft Plan, the City is requesting language that directs growth to specific, efficient locations. The City indicates that the use of “should” statements within draft Plan policies rather than “shall” statements does not help support the purpose of the Regional Growth Plan in directing growth to defined strategic locations.

The City of Calgary

The City raised several concerns with the draft Plan and is requesting that County Council not give second reading to the document until further time is given to allow both Administrations to resolve the identified concerns. The City's principal areas of concern include:

- In conflict with the IGP (Policy 3.2.3), The City asserts that the County has not sufficiently addressed potential detrimental impacts on Calgary's regionally significant infrastructure, corridors, and services.
- The City contends that the proposed Plan does not identify priority growth areas or provide growth management policies for the County, and suggests that this has potential to create a dispersed pattern of growth, contrary to the intent of the IGP.
- The City has significant concern that the Plan does not adequately address source water protection concerns.
- The City is requesting removal of the Plan's County growth areas from City of Calgary growth corridors approved within the Calgary and Rocky View County Intermunicipal Development Plan; this specifically relates to the County's developer-led Shepard Industrial ASP project, which is ongoing.
- The City considers that the County has not undertaken sufficient collaboration in developing the draft Plan to resolve cross-boundary issues.



Town of Cochrane

- In its Cochrane Community Vision, The Town identified a need to protect the gateways into Cochrane (Highway 22 and Highway 1A) and retain their rural character. The Town is requesting that the draft Plan reflects these gateways through policy amendments.
- The Town considers that moving forward with the identification of growth areas and employment lands before the completion of the Regional Growth Plan is against the spirit of regional collaboration.

At the time of drafting this report, County Administration is continuing to collaborate with the three (3) municipalities that have outstanding concerns, and will present any suggested revisions to the MDP draft to Council for consideration at the public hearing. However, Administration does consider that regardless of any further amendments made to the draft Plan, the document attached to this report is in full alignment with the IGP and all relevant IDPs.

CHANGES SINCE FIRST READING:

In finalizing the draft Plan, Administration made several revisions to the first reading bylaw draft and these are noted within Schedule 'A' of the Bylaw (see Attachment 'A'). The amendments include:

- inserting additional mapping to illustrate regional corridors and infrastructure;
- adding and amending policy on items such as source water protection, flood risk, and transit in response to intermunicipal and agency feedback, and to ensure alignment with the IGP;
- minor textual amendments to improve clarity and interpretation; and
- mapping changes to growth area maps to align with intended ASP direction and existing approvals.

PUBLIC SUBMISSIONS:

The Public Hearing was advertised in accordance with the MGA. The letters received in response can be viewed in Attachment 'C'.

OPTIONS:

- Option #1: Motion #1 THAT Bylaw C-8090-2020 be amended in accordance with Attachment 'A'.
 *Note: Council should consider any amending motions, including those set out within Attachment 'D', after Motion #1 and prior to Motion #2.
- Motion #2 THAT Bylaw C-8090-2020 be given a second reading, as amended.
- Motion #3 THAT Bylaw C-8090-2020, as amended, be referred to the Calgary Metropolitan Region Board for approval.
- Option #2: THAT Bylaw C-8090-2020 be refused.
- Option #3: THAT alternate direction be provided.

Respectfully submitted,

Concurrence,

"Theresa Cochran"

"Al Hoggan"

Executive Director
Community Development Services

Chief Administrative Officer



DK/lt

ATTACHMENTS

ATTACHMENT 'A': Bylaw C-8090-2020 and Schedule 'A' (MDP)

ATTACHMENT 'B': Intermunicipal Comments

ATTACHMENT 'C': Public Submissions

ATTACHMENT 'D': Proposed Council and Administration Motions



BYLAW C-8090-2020

A Bylaw of Rocky View County, in the Province of Alberta, known as the Municipal Development Plan, pursuant to Section 632 of the *Municipal Government Act*.

The Council of Rocky View County enacts as follows:

Title

- 1 This Bylaw may be cited as “Municipal Development Plan.”

Definitions

- 2 Words in this Bylaw have the same meaning as those set out in the *Municipal Government Act* except for the definitions provided below:
 - (1) **“Council”** means the duly elected Council of Rocky View County;
 - (2) **“Municipal Government Act”** means the *Municipal Government Act*, RSA 2000, c M-26, as amended or replaced from time to time; and
 - (3) **“Rocky View County”** means Rocky View County as a municipal corporation and the geographical area within its jurisdictional boundaries, as the context requires.

Effect

- 3 THAT Schedule ‘A’ to Bylaw C-8090-2020 is adopted as the “Municipal Development Plan” to provide a comprehensive land use policy framework that outlines where and how development and growth may take place across the County.

Transitional

- 4 Bylaw C-8090-2020 is passed and comes into full force and effect when it receives third reading and is signed in accordance with the *Municipal Government Act*.



READ A FIRST TIME IN COUNCIL this	6 th	day of	October	,	2020
<i>PUBLIC HEARING WAS HELD IN COUNCIL this</i>		<i>day of</i>		,	2021
READ A SECOND TIME IN COUNCIL this		day of		,	2021
READ A THIRD TIME IN COUNCIL this		day of		,	2021

Reeve

CAO or Designate

Date Bylaw Signed

**SCHEDULE 'A'****FORMING PART OF BYLAW C-8090-2020**

A Municipal Development Plan (MDP), which establishes the guidelines for growth and development in the County over the next 20 years. The MDP provides a comprehensive land use policy framework which outlines where and how development and growth may take place across the County.



DRAFT

MUNICIPAL DEVELOPMENT PLAN

February 2021 | Draft 5 | Red-Lined

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Executive Summary

What is the Municipal Development Plan

Rocky View County's Municipal Development Plan (MDP) sets out the guidelines for growth and development in the County over the next 20 years. The MDP provides a comprehensive land use policy framework which outlines where and how development and growth may take place across the County.

The Municipal Development Plan is a statutory document required by the Province of Alberta as specified by the Municipal Government Act.

Why is the Plan Needed

The County has grown by approximately 15,000 people over the past 20 years and will continue to grow. The MDP sets the vision for how to accommodate this growth in a sustainable manner, and will serve as an important decision-making tool for Council, County Administration, developers, residents, and other stakeholders.

What Is Included in the Plan

The MDP's vision and guiding principles provide structure to the Plan and will guide future decision making. The vision defines the ideal state for Rocky View County while the six guiding principles, relating to responsible growth, economic diversification, community development, agriculture, the environment, and partnerships add further detail about the elements and actions required to achieve the vision.

The MDP's land use policies will guide development throughout the County and identify growth areas for residential, commercial, industrial, and institutional development. These growth areas, presented as the MDP's Growth Concept, provide a planning framework that balances sustainable development with providing a high quality of life and diverse range of residential and economic opportunities.

County-wide policies within the MDP provide high level direction on County services, operations, and infrastructure. They are intended to improve County services, promote economic diversification, enhance quality of life, and strengthen community identity.

How will the MDP be Implemented

Implementation of the MDP will occur through several mechanisms and processes, including:

- Ongoing administration of the development review process and periodically reviewing and amending area structure plans;
- Carrying out next steps required to implement the vision, guiding principles, and objectives of the MDP; and
- Collaborating with neighbouring municipalities on planning and development matters.

The MDP will be monitored and regularly reviewed based on a series of performance measures to ensure development is being effectively guided.

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SECTION 1:

INTRODUCTION

1.1 Purpose

The Municipal Development Plan (MDP) outlines a vision for Rocky View Country from a planning and development perspective and provides direction for how and where the County may grow over the next 20 years. The MDP provides policies to guide future growth areas, land uses, infrastructure, community services, and the physical development of the county.

Rocky View County has grown by about 15,000 people in the last 20 years, and will continue to grow. The Municipal Development Plan sets the vision for how to accommodate this growth responsibly, serving as an important decision-making tool for Council, County Administration, and stakeholders. Specifically, the MDP:

- Updates the vision, policies, and actions of the 2013 County Plan;
- Describes the County's preferred direction with respect to growth areas, land use, infrastructure investments, business development, and provision of County services;
- Provides policy direction and planning tools regarding land use, transportation, infrastructure, and recreation and community services;
- Informs County bylaws, policies, programs, and investments;
- Establishes a framework for the County to work with regional partners, stakeholders, and communities to find mutually beneficial solutions to planning and development challenges; and
- Helps residents and landowners understand how their land may be used now and in the future.

1.2 Development of the Plan and Engagement Process

The MDP was developed over five stages between 2019 and 2020. Comprehensive public and stakeholder engagement was conducted throughout the development of the MDP. The public and stakeholders were made aware of the MDP project and engagement opportunities through a variety of communication methods including a project webpage, social media posts, resident mail-outs, local media, County newsletters, a project mailing list, and direct contact with stakeholders. Throughout the course of the project 475 people attended project open houses, and 1,250 people participated in online surveys.

MDP Project Stages

1. Project Kick-Off (Summer 2019)

The MDP project was launched with a pop-up information booth at the County's annual pancake breakfast, and a workshop with Rocky View County Council identified project goals.

2. Vision and Principles (Summer 2019)

A vision and guiding principles were established for the MDP. Residents and stakeholders provided comments and insights through eight open houses and an online survey. Participants identified that protecting Rocky View County's natural landscapes, preserving agricultural lands, focusing new growth in existing and planned areas, and expanding the parks and trails network should be priorities for the MDP. County staff also conducted a technical review of the County Plan to identify what policies were effective, and which ones could be improved or excluded.

3. Growth Strategies (Fall-Winter 2019)

Incorporating Stage 2 engagement comments, a development suitability analysis was conducted to determine where additional residential, commercial, and industrial development within the County could be appropriate. The public and stakeholders were able to provide feedback on the findings of the development suitability analysis, as well as to provide feedback on the proposed vision and guiding principles at seven open houses and through an online survey. A workshop with Council confirmed the development suitability analysis and provided next steps on establishing a growth concept for the MDP.

4. Draft MDP (Winter-Spring 2020)

Following input from Stage 3 engagement, and with direction from Council and County staff workshops, a draft plan and growth concept were developed. The public and stakeholders were able to review the draft MDP and identify red flags for the project team through an online survey. Additionally, neighbouring municipalities and regional partners had the opportunity to review the draft Plan and provide comments.

5. Public Hearing and Project Completion (Fall/Winter 2021-2020)

A comprehensive intermunicipal and agency circulation informed final revisions to the draft MDP. Following these revisions the legislated public notice circulations were completed, with a public hearing held on February 16. With Council approval, the MDP was submitted to the Calgary Metropolitan Region Board (CMRB) for regional approval before return to Rocky View Council for final reading.



Stage 2 Open House

1.3 Vision and Guiding Principles

The MDP's vision statement and guiding principles are foundational statements that guide the Plan. The vision defines the ideal state for Rocky View County while the guiding principles add further detail about the elements and actions required to achieve the vision. These statements, in turn, inform the Plan's policies, and together provide the framework to guide County development and growth.

Vision

Set within a cherished natural landscape, Rocky View County is a flourishing municipality that provides a high quality of life, guided by its rural heritage, a diversity of residential and economic opportunities, and sustainable development.

Guiding Principles

The following principles provide a framework to guide decision making when implementing the policies and outcomes of the MDP.

1. Responsible Growth

Rocky View County should concentrate growth within designated development areas, ensuring equitable services are provided to residents in a fiscally sustainable manner.

2. Economic Diversification

Rocky View County should support and promote economic diversification through new business development, existing business expansion, building a sustainable and balanced tax base, and creating a place where residents, businesses and tourists from a global reach find a thriving economy.

3. Community Development

Rocky View County will build resilient communities and welcoming neighbourhoods **by promoting concentrated growth within designated development areas**, through greater access to recreation amenities, **providing** valued gathering spaces, and **encouraging** creative design.

4. Agriculture

Rocky View County will continue to support **traditional agriculture and agricultural** diversification and innovation, recognizing agriculture as an important part of the County's identity and economy. Rocky View County will encourage opportunities for value added agricultural businesses to develop and grow.

5. The Environment

Rocky View County will develop and operate in a manner that protects the ecological integrity of the County and preserves natural landscapes for future generations to enjoy.

6. Partnerships

Rocky View County will work in a spirit of collaboration with regional partners, stakeholders, businesses, and communities to find mutually beneficial solutions to planning and development challenges, making the County focal point for creativity and innovation.

1.4 Rocky View County Context

Located within the Calgary Metropolitan Region in southern Alberta, Rocky View County encompasses nearly one million acres of diverse landscapes, communities, and economic opportunities. The County surrounds the City of Calgary on three sides, and shares borders with 14 other municipalities and First Nations. In the County's western reaches, coniferous forests of the Rocky Mountain Foothills transition to rolling hills scattered with ranches. Moving eastward, the foothills give way to prairie grasslands and wetlands. Eastern Rocky View County is dominated with agricultural operations, including the production of hay, cereal and oilseed crops.

Across the County, farms and isolated dwellings are interspersed with hamlets and small towns. Many of these communities originated alongside railways at the beginning of the twentieth century as service centres for surrounding agricultural areas. More recently, country residential acreages have sprung up throughout the County. Forming distinct communities, these acreages have dominated residential development in the County over the last 40 years. More residential communities have also been developed that include a broader range of commercial shops, services, and employment opportunities.

Large scale ranching, logging, and oil and gas extraction are major industries in western Rocky View County while **shale gas development**, ranching, **equestrian livestock** operations, **conventional agricultural operations**, and diversified agriculture, including greenhouses and nurseries, are prominent in eastern areas of the County. Commercial activities also occur along major highways that traverse the County, including the Trans-Canada Highway (Highway 1), and Queen Elizabeth II Highway (Highway 2). Large scale commercial and industrial operations are also located in the County adjacent to the City of Calgary, the Calgary International Airport, and the Springbank Airport.

Access to nature and outdoor recreation opportunities are abundant throughout Rocky View County. The region's waterways, including the Bow and Elbow Rivers, provide fishing, boating, canoeing, and kayaking opportunities. Provincial parks, golf courses, and trail and pathway networks provide additional recreation opportunities for residents and visitors.

Rocky View County is unique from other municipalities in the region, as it contains large rural, ranching, and agricultural areas as well as growing urban communities. This diversity of lifestyle opportunities along with its natural landscapes and ecological features are why many people are attracted to the County. However, Rocky View, like other municipalities located on the edge of a large urban centre, is facing challenges from development and growth pressures. The County is projected to grow by approximately 5,800 new dwellings by 2038. Directing new growth to appropriate locations will be an important component of creating a fiscally sustainable municipality in the long-term. While dispersed growth offers quality of life benefits, including a low cost of living and access to nature, the provision of services to these areas can become a long-term burden on the County's finances. The Municipal Development Plan is needed to ensure that the County continues to flourish by balancing sustainable development with providing a high quality of life and a diversity of residential and economic opportunities for its residents.

1.5 Plan Structure

The Municipal Development Plan is divided into four distinct sections, collectively presenting a roadmap for future growth and development that will help the County follow the guiding principles and realize the vision.

1. **Introduction:** Summarizes the MDP's context, including the legislative framework under which it operates, presents the Plan's vision and guiding principles, and describes how the Plan should be read and interpreted.
2. **Land Use Policies:** Presents a Growth Concept for the County, and outlines how the MDP will facilitate growth and development within the context of fiscal and environmental sustainability.
3. **County-Wide Policies:** Provides guidance on County-wide services, operations, and infrastructure to support growth and development, including policies on financial sustainability, transportation, natural resource development, agriculture, utilities, and public spaces.
4. **Implementation and Monitoring:** Provides a framework for the commitments and actions the County will make to ensure the MDP is implemented, and includes performance measures that will serve as a barometer for measuring the success of the MDP.

Plan Outcomes and Policies

The MDP's vision and guiding principles will be achieved through the application of the policies and objectives of each policy section. Policies provide guidance to decision makers and the public about how the County should grow and develop, while objectives are the targets for individual policy sections that achieve the County's vision and guiding principles.

Policy Terms

The following key terms outline how policies should be interpreted and implemented by the County.

- **Shall:** While the MDP is generally intended to guide development with the understanding that flexibility is required, certain policies related to fiscal responsibility, legal obligations, and other factors are mandatory. In these contexts, the term 'shall' is used to indicate that actions must be complied with, without discretion, by administration, developers, Council, Planning Commission, and any other authority involved in land use development approvals.
- **Should:** Where policy is not mandatory but still relates to a strongly preferred course of action, the less restrictive term 'should' is used.
- **May:** Used in policies that are discretionary in nature, the term 'may' means that the policy could be enforced by the County dependent on the circumstances of the proposal in question.

Definitions

Throughout the MDP's policies defined terms are italicized and their definitions can be found in Appendix A.

1.6 The Planning Framework

The planning framework outlines the key planning documents that guide land use and development in Rocky View County, providing context for how each document interacts and informs the others. Plans at the top of the framework such as intermunicipal development plans (IDPs) and the MDP provide broad, high-level policy direction, while lower-level plans are subordinate to the plans above and must be consistent with the policies and direction of the higher-order plans. The level of detail and specificity in policies increases the further down the plan is in the framework diagram (Figure 1).

Plans higher in the framework will generally determine when a subordinate plan is required. For example, an area structure plan (ASP) provides criteria for master site development plan and conceptual scheme preparation. When there is no ASP or other subordinate plan, the MDP will determine whether a subordinate plan is required to provide greater planning detail. The hierarchy of the different plans and legislation is identified in Figure 1.

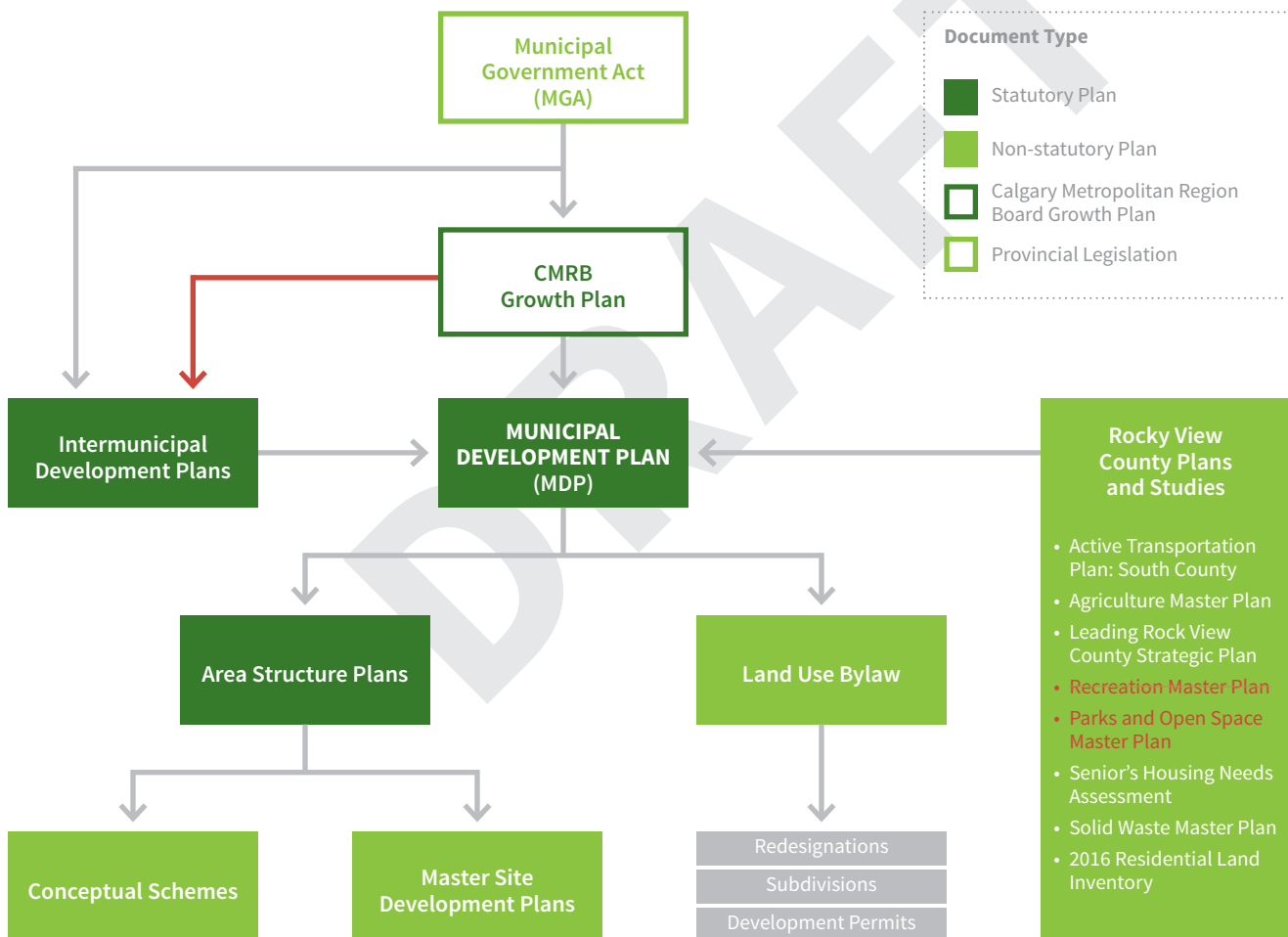


Figure 1: Planning Framework Alignment

1.6.1 Legislation

Municipal Government Act

The Municipal Government Act provides the legislative framework under which all municipalities must operate, establishing that the purpose of a municipality is:

- To provide good government,
- To foster the well-being of the environment,
- To provide services, facilities or other things that, in the opinion of Council, are necessary or desirable for all or a part of the municipality,
- To develop and maintain safe and viable communities,
- To work collaboratively with neighbouring municipalities to plan, deliver, and fund intermunicipal services.

Part 17 of the Municipal Government Act regulates planning and development and empowers municipalities to prepare plans:

- To achieve the orderly, economical and beneficial development, use of land and patterns of human settlement, and
- To maintain and improve the quality of the physical environment within which patterns of human settlement are situated in Alberta, without infringing on the rights of individuals for any public interest except to the extent that is necessary for the overall greater public interest.

Municipalities are required under the Act to adopt a municipal development plan, and the plan must be consistent with all intermunicipal development plans (IDPs) the municipality is a part of. The Municipal Government Act also allows for the development of subordinate plans, such as area structure plans, to further direct planning and development.

1.6.2 Regional Plans

Calgary Metropolitan Region Board Growth Plan

The Calgary Metropolitan Region Board (CMRB), of which Rocky View County is a member, was formed in 2018 and is mandated to promote the long-term sustainability of the Calgary Metropolitan Region. This includes ensuring environmentally responsible land-use planning and growth management, coordinating regional infrastructure investments and service delivery, and promoting the economic wellbeing and competitiveness of the Region.

Prior to the development and approval of a long-term Growth Plan and Servicing Plan, the CMRB's Interim Growth Plan provides guidance on land-use, growth, and infrastructure planning for all ten member municipalities and other regional stakeholders. Any statutory plan passed or amended by member municipalities, including the County's Municipal Development Plan, must conform with the Interim Growth Plan, until the Growth Plan and Servicing Plan are adopted and approved.

1.6.3 Statutory Plans

Intermunicipal Development Plans

IDPs are approved by Council in both partnering municipalities. Planners refer to these documents to make recommendations to Council for managing or changing land use, and to address growth issues in a way that aligns the interests of the County and the municipalities they share a border with. These plans may include how the two municipalities will work together, the development of joint lands, and how to co-ordinate parks, open space, recreation, transportation, water, utilities, and other municipal services across boundaries.

Rocky View County has approved ~~or-draft~~ IDPs with the following municipalities:

- City of Calgary
- City of Airdrie
- Kneehill County

- Municipal District of Bighorn
- Town of Cochrane
- Town of Crossfield

The County will strive to limit development around the Villages of Beiseker and Irricana in accordance with their respective Memoranda of Understanding, and will pursue further IDPs with other municipalities as appropriate.

The County is pursuing IDPs with the following municipalities:

- Village of Beiseker
- Wheatland County

Municipal Development Plan

The MDP is the County's principal statutory plan, providing strategic growth direction, overall guidance for land use planning, and service delivery policy. The MDP also provides specific policy guidance for areas that do not fall within the boundaries of an area structure plan or other subordinate plan.

Area Structure Plans

ASPs are statutory plans that are subordinate to the MDP, and provide a land use strategy for redesignating and developing a specific area of land in the County. ASPs contain maps, goals, and policies that set out general locations for major land uses, major roadways, utility servicing, recreation areas, and development phases.

1.6.4 Non-Statutory Plans

Land Use Bylaw

The Land Use Bylaw is a regulatory bylaw of the County required by the Municipal Government Act. Every parcel of land in the County has a land use district, and the Land Use Bylaw details the permitted and discretionary land uses in each district and regulates the development of land and buildings within the county.

Conceptual Schemes

Conceptual schemes are non-statutory plans, subordinate to an ASP, and may be adopted by bylaw or resolution. Conceptual schemes provide detailed land use direction, subdivision design, and development guidance to Council, administration, and the public. Conceptual schemes are meant to be developed within the framework of an ASP.

To ensure the opportunity for public input, the County will continue its practice of adopting a conceptual scheme by bylaw with a public hearing. If an ASP is amended to include a conceptual scheme, the conceptual scheme becomes a statutory plan.

Master Site Development Plan

A non-statutory plan that is adopted by Council resolution, a master site development plan accompanies a land use redesignation application and provides design guidance for the development of an area of land with little or no anticipated subdivision. In some cases, a master site development plan may be used following a conceptual scheme when certain site design details have not been finalized.

A master site development plan addresses building placement, landscaping, lighting, parking, and architectural treatment. The plan emphasis is on site design with the intent to provide Council and the public with a clear idea of the final appearance of the development.

1.6.5 Implementation of Plans

Implementation of the statutory and non-statutory plans described above is primarily achieved by:

- Application and amendment of the Land Use Bylaw;
- Evaluation and approval of land use redesignation and subdivision applications;
- Evaluation and approval of development permits; and
- Application of County Policy and County Servicing Standards.

1.6.6 Additional Plans and Studies Informing the MDP

Beyond the statutory planning framework outlined above, the development of the MDP has also been informed by the following plans, studies, and strategic documents.

Active Transportation Plan: South County

The Plan provides direction on priorities for establishing a connected network of on- and off-street facilities where walking and cycling is a safe and accessible choice for all residents. The Plan includes infrastructure and programming recommendations that can be implemented strategically over time. The MDP provides high-level direction on expanding and improving pedestrian and cyclist networks, and the development of a regional pathway and trail plan.

Agriculture Master Plan

The Master Plan identifies a long-term vision for supporting both existing agricultural operations and providing new opportunities for diversification of the County's agriculture sector. The Plan informs future planning decisions and policy development related to the agriculture industry. The MDP provides high-level direction to support and grow the agriculture sector within the County, and minimize adverse impacts on agricultural land.

Leading Rocky View County Strategic Plan

The Strategic Plan outlines Council's Mission, Vision, Values, Strategic Themes, and Strategic Objectives for Rocky View County's municipal government. The Plan identifies strategic objectives that Council and Administration should prioritize, including: expand community service delivery, embrace partnerships, strengthen the County's financial resiliency, and guide the County's growth pattern. The MDP's guiding principles have been informed by, and align with the Strategic Plan's strategic objectives.

Recreation Parks and Open Space Master Plan

The Master Plan is a 25-year strategy providing an overarching vision for the County to make future decisions for open space, parks and trails. The MDP provides high-level direction for expanding and improving the County's parks and open space system. This includes improving access through expansion of the County's pathways and trails network, connecting wildlife corridors, and ensuring development does not detract from adjacent parks and open spaces.

Senior's Housing Needs Assessment

The Report identifies and quantifies the types and numbers of seniors housing needed in the County over the next 10-15 years, as well as land requirements and locations to meet this need. The MDP provides high-level direction about improving quality of life for all residents in the County, and supports housing diversity.

Solid Waste Master Plan

The Master Plan guides County decision-making with respect to solid waste. The Plan provides futures solid waste management considerations that impact land use and growth, including coordinating solid waste disposal systems with other municipalities, siting considerations for new landfill facilities. Servicing, including waste management, is an important consideration of the MDP's Growth Concept.

2016 Residential Land Inventory

The Land Inventory provides an assessment of the current and future availability of residential housing in the County. An analysis of existing dwellings, approved parcels, and approved policy areas provide an indication of the residential development capacity of the County. The Land Inventory informed the MDP's Growth Concept.

SECTION 2:

LAND USE POLICIES

Rocky View County's proximity to Calgary and other urban centres has profoundly shaped its existing land uses and patterns of growth. The County has become a desirable location for both urban and country-residential development, attracting people who want to live in close proximity to Calgary or Airdrie but with a quieter lifestyle, lower cost of living, or access to the County's natural assets. This has resulted in the growth of new communities and expansion of existing hamlets. However, if not managed properly this growth pressure can result in dispersed development that negatively impacts other land uses, including farming, ranching, and existing residential development. Agricultural operations, for example, can become less productive or unviable if fragmented by residential and commercial development. Additional exurban development may also lower the quality of life for existing residents by eroding the rural character of areas or adding greater pressure on existing infrastructure and municipal services.

The land use policies in this section guide development throughout the County, and identify growth areas for new residential, commercial, institutional, and industrial development. The MDP's Growth Concept provides a framework that balances sustainable development with providing a high quality of life and diversity of residential and economic opportunities in the County. The Growth Concept incorporates the County's existing area structure plans and conceptual schemes that have provided development and design guidance, established community boundaries, and identified future growth areas. The Concept also responds to investments the County has made in municipal servicing infrastructure, particularly in the Balzac East and Bragg Creek areas.

As identified in the Growth Concept (*Section 2.2*), new residential, commercial, and industrial growth is primarily directed to existing and planned growth areas. By focusing growth in these areas, Rocky View establishes certainty for residents and the development community as to where growth should be expected. Prioritizing growth in existing and planned areas also allows the County to leverage municipal

investments in servicing and transportation infrastructure, generating growth that is fiscally responsible.

2.1 Population and Housing Trends

Rocky View County has experienced sustained growth and development pressure over the past 20 years, despite the economic recession starting in 2008. Since the last MDP (the County Plan) was approved in 2013 the County has added just under 5,000 new residents. Most of these new residents have located in the hamlets of Langdon and Conrich, and the country residential communities of Bears paw and Springbank. The Calgary Metropolitan Region Board projects that Rocky View County will continue to grow, increasing from a population of 42,424 in 2018 to just over 60,000 by 2040. It is important to identify how changing consumer trends and market demand will influence where and how this growth occurs.

Rocky View County has historically experienced population growth through country residential development in communities such as Bears paw and Springbank. However, the past 25 years have seen residential consumer demand expand from predominantly country residential developments to a broader development mix of country residential, hamlet, and more densely planned communities (e.g. Harmony, Cochrane Lake, Elbow Valley). This trend is borne out through the County's 2016 Residential Land Survey. While country residential communities and hamlets have remained mainstays in Rocky View's housing portfolio, the Residential Land Survey highlights that residential development in Rocky View County is becoming more diverse with a range of housing options.

The most popular development areas throughout 1996-2016 were the country residential community of Bears paw and the hamlet of Langdon. While these two communities were cornerstones of the County's residential growth over this time period, growth also occurred in the more densely planned communities of

1996-2000	2001-2005	2006-2010	2011-2016
1. Bearspaw	1. Elbow Valley	1. Langdon	1. Bearspaw
2. Langdon	2. Langdon	2. Cochrane Lake	2. Langdon
3. Central Springbank	3. Bearspaw	3. Bearspaw	3. Conrich

Table 01: Population Growth Areas

The top three growth areas in the County over five-year increments represent a diverse portfolio of housing.

Elbow Valley and Cochrane Lake, the hamlet of Bragg Creek, and the country residential community of Central Springbank.

As a result of changing consumer preferences and market demand, key locations within the County are experiencing increased growth. Generally, these areas offer greater access to commercial services and employment opportunities, a diversity of housing options, and recreation opportunities such as parks and pathway systems. The newly developing communities of Glenbow Ranch and Harmony in the County’s western half are examples of these denser and more connected community villages.

When planning for future growth, it is important that Rocky View County retains the ability to offer a broad range of housing options so that the County can respond and adapt quickly as consumer demands change. This will ensure that Rocky View County continues to flourish, providing a high quality of life and a diversity of residential and economic opportunities.

2.2 Growth Areas

Development in Rocky View County for the next 20 years is guided by the Growth Concept. The Concept is the result of an approach that considered current plans and policies, market patterns, and a suitability analysis to identify growth priority areas. The suitability analysis used spatial data to identify landscapes that may not be appropriate for growth (e.g. wildlife corridors, wetlands, agricultural lands), and factors that would increase the suitability of an area for additional development (e.g. access to existing transportation infrastructure and servicing).

The Growth Concept Map (*Figure 2*) identifies the priority areas within the County for the continued growth and expansion of residential, commercial, and industrial land uses. New development may occur outside of the identified priority growth areas, however, with Council review and approval. The map also highlights the presence of ecological features that warrant further study when development is proposed in these areas.

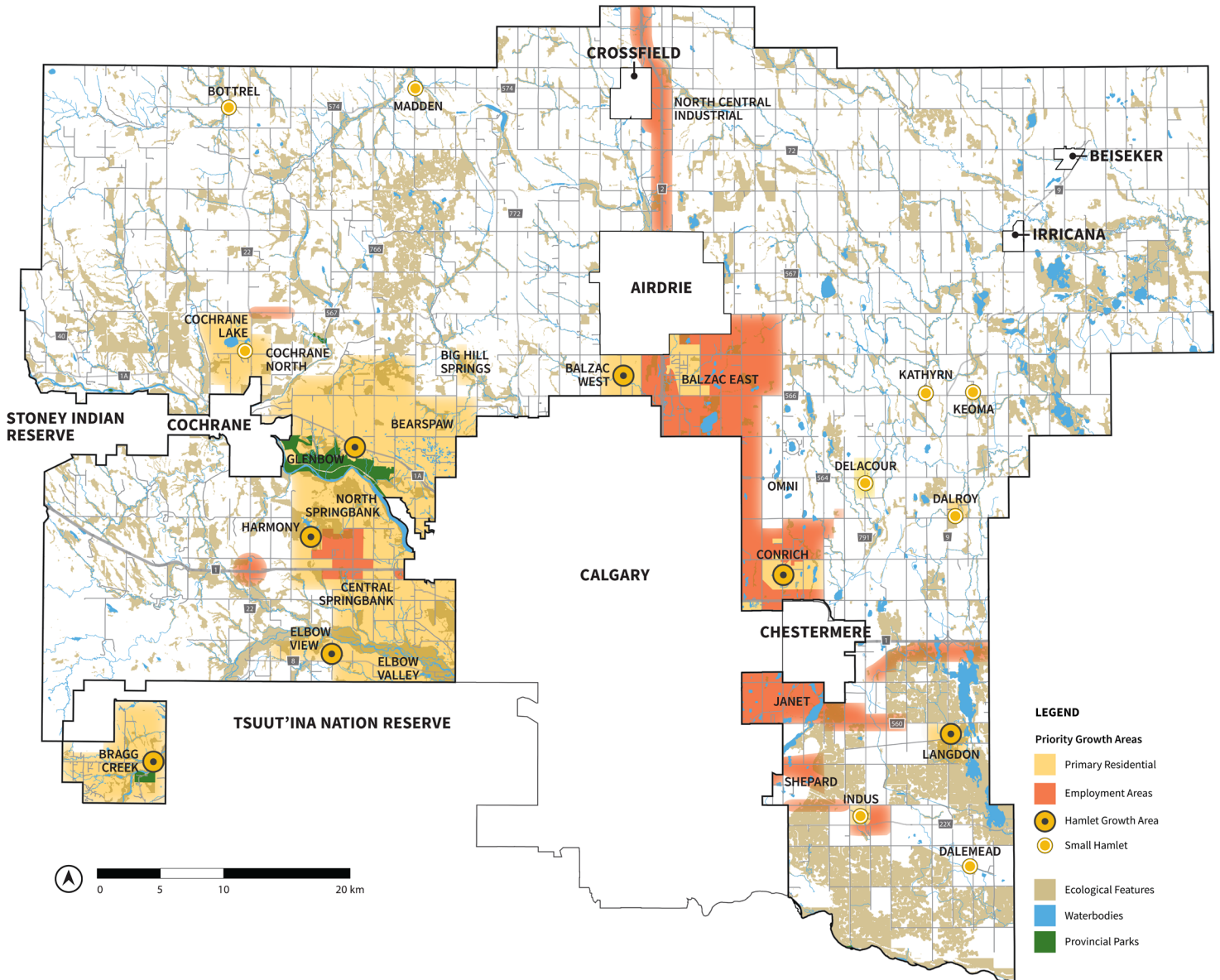


Figure 2: Growth Concept Map Identifying Priority Areas for Growth

This map is conceptual in nature, and is not intended to be used for measurements.

The Growth Concept Map identifies four categories of growth areas:

Primary Residential Areas: These residential areas are where most of Rocky View County residents currently live. Residential growth in these areas will occur through existing capacity in previously planned areas, and new growth areas that will provide a greater range of housing options to appeal to changing market preferences. Existing and new mixed-use commercial areas will provide compatible retail, employment, and other commercial land uses. *Figure 3* identifies areas that have been planned with existing ASPs and unplanned areas where ASPs will need to be completed.

Employment Areas: These areas primarily contain commercial and industrial land uses and serve as major areas of employment in the County. Development will continue in existing growth areas, with new growth added in suitable locations to fulfill market demand. Most large scale industrial and commercial development will be directed to these areas.

Hamlet Growth Areas: These hamlets are prioritized by the County for servicing and infrastructure upgrades to enable continued growth and redevelopment in a sustainable manner. In addition to residential land uses, they will include supporting commercial and industrial land uses, often in the form of a main street or central commercial area.

Small Hamlets: Unlike Hamlet Growth Areas, these existing hamlets are not prioritized by the County for servicing and infrastructure upgrades. However, additional growth that is in keeping with the character of these hamlets is appropriate. Small hamlets may contain supporting and appropriately scaled commercial and industrial activity.

The Growth Concept Map identifies other areas that need to be considered when planning for additional growth:

Ecological Features: These potentially important ecological features include wetlands, riparian areas, valuable agricultural soils, and wildlife corridors. These areas may not be appropriate for additional development, and should be considered when area structure plans and conceptual schemes are created or amended.

Sourcewater protection is of particular concern when identifying and protecting ecological features. *Section 3.5* contains policies for development in and near ecological features.

Waterbodies: These rivers, streams, and large wetlands provide aesthetic and ecological benefits. Future development should avoid or mitigate impacts to these areas.

Provincial Parks: There are two provincial parks in Rocky View County, Glenbow Ranch and Big Hills Spring. Future development adjacent to these parks should mitigate any impacts to their environmental or recreation functions.

2.2.1 Planned and Unplanned Future Growth Areas

Most of the Priority Growth Areas identified on *Figure 2* are previously planned areas with existing ASPs. As these areas have not been fully developed, they are able to accommodate additional growth over the next 20 years. The MDP's policies largely reflect the general intents of these existing plans. The areas are shown as Planned Areas on *Figure 3*. As Country resources allow, existing ASPs that encompass areas that will receive additional growth should be updated based on the direction of the MDP.

New growth areas have been identified to provide residential, commercial, and industrial development that meets the needs and preferences of a growing population. These areas are shown as Future Planning Areas on *Figure 3* and will require ASPs or conceptual schemes to determine how future growth is accommodated in a sustainable manner.

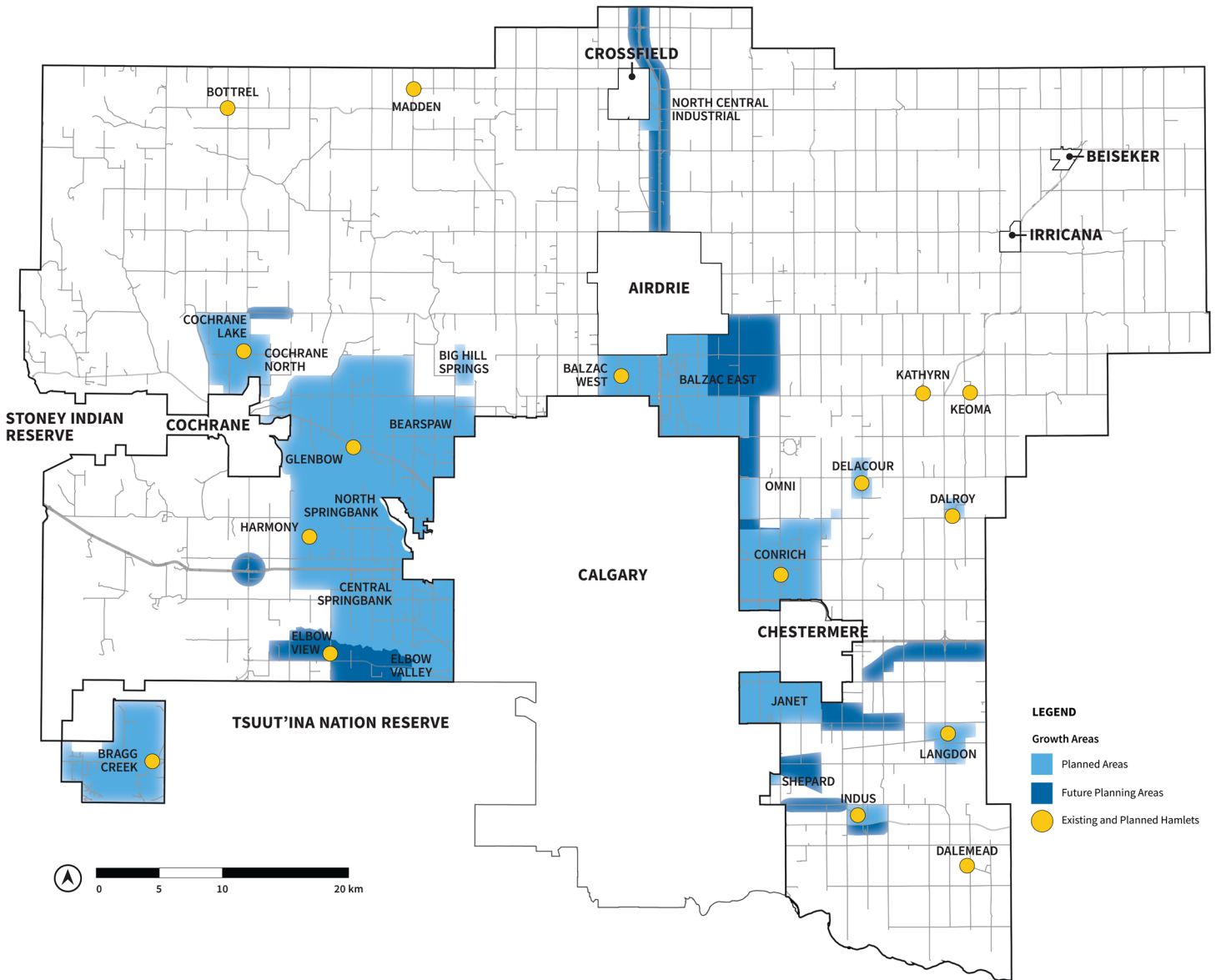


Figure 3: Planned and Future Planning Growth Priority Areas

This map is conceptual in nature, and is not intended to be used for measurements.

2.3 Residential Development

Residential land uses are the primary form of development in Rocky View County. It is important to plan for residential development that respects the values of County residents while balancing the need to grow responsibly. The policies contained in this section reflect this balance and provide a framework that will guide residential development in the County for the next 20 years.

Objectives

The policies within the Residential Development Policy Area are to ensure the following objectives:

- Opportunities for residential growth are provided that enable housing diversity for all ages, abilities, and incomes.
- The majority of residential growth occurs within Primary Residential Areas.
- Support higher density residential development where appropriate.
- Residential development supports with the MDP's vision and guiding principles, and aligns with Leading Rocky View County, Council's Strategic Plan.
- Alternative residential development forms that reduce the overall development footprint are pursued.
- Communities maintain a strong sense of community.
- Planning and development in the County supports safe, healthy, and attractive communities.

2.3.1 Primary Residential Areas

Primary Residential Areas comprise lands where residential development and ancillary commercial and light industrial development will be the predominant land use. Although all Hamlet Growth Areas are located within Primary Residential Areas, they are addressed by specific policies in *Section 2.5*. When including Hamlet Growth Areas, most of the residential growth within the County over the next 20 years will be directed to Primary Residential Areas.

- a) Support the development of Primary Residential Areas, as identified in *Figure 2*, as designated residential growth areas over the planning horizon of the MDP.
- b) New development may occur outside of identified priority growth areas with Council review and approval.
- c) Development within Primary Residential areas shall be in accordance with applicable *IDPs*, area structure plans, and/or conceptual schemes.
- d) The County shall update existing area structure plans and conceptual schemes, as resources allow, to align with direction provided by the MDP.
- e) The County should develop or expand area structure plans or conceptual schemes for Primary Residential Areas not currently covered by these plans.
- f) Primary Residential Areas should receive County services identified in the applicable area structure plans, conceptual schemes, or County bylaws.
- g) Applications to redesignate land for *multi-lot* residential use adjacent to or in the vicinity of Primary Residential Areas should not be supported unless the proposed development area

is approved as an amendment to hamlet boundaries or applicable area structure plans or conceptual schemes.

- h)** Where a new area structure plan is needed the plan should incorporate the following:
- i)** Establishes density ranges and dwelling unit numbers that determine population projections and the maximum number of dwelling units on the basis of developable land and the availability of water and wastewater servicing;
 - ii)** Provides for the distribution and varied densities of dwelling units within portions of the development area;
 - iii)** Identifies mechanisms to effectively manage the open lands;
 - iv)** Development conforms to current technical servicing requirements and master servicing plans and policies;
 - v)** Provides patterns of development and transportation networks that create regional linkages between subordinate plans; and
 - vi)** Should address the following:
 - Future land use concept;
 - Population estimations and impact on existing services, infrastructures, and amenities;
 - Form, quality, design, and compatibility of proposed development;
 - Design of public realm elements, including main streets, and community gathering spaces;
 - Provision of parks, open space, recreation amenities, and active transportation connections;
 - Considerations for educational facilities;
 - Mitigations for impacts on the environment;
 - Interface design with adjacent agriculture, natural areas, or adjacent municipalities;
 - Utility connections; and

- Regional transit connections.

vii) Where the ASP is located in areas adjacent to an intermunicipal partner, appropriate intermunicipal collaboration on key cross-boundary concerns.

- i)** New or amended area structure plans that include compact residential development should also incorporate the following:
 - i)** Permanent retention of a significant amount of the developable area as open land. The minimum desired percentage of open land will be determined by the area structure plan;
 - ii)** Allows for residential dwelling unit bonusing when dedicated open land exceeds the minimum requirement or to achieve other identified benefits; and
 - iii)** Identifies and applies mechanisms that permanently prevent subdivision of open lands.

2.3.2 Country Residential Development

The County has a number of country residential communities within Primary Residential Areas, some formally defined by area structure plans while others have grown organically over time. Country residential communities provide a unique lifestyle that many people desire, but additional growth in these areas should be considered through the lens of long-term fiscal sustainability for the County.

- a) *Country residential development* shall conform to the relevant area structure plan, and the policies of the MDP.
- b) Where *residential development* with two or more dwelling units and greater than 4 hectares (9.9 acres) is proposed, but there is no existing area structure plan or conceptual scheme that includes the development area, an area structure plan or conceptual scheme should be adopted. When determining whether an area structure plan or conceptual scheme is appropriate, Council should give consideration to:
 - Number of units proposed;
 - Intensity of the proposed development;
 - Relationship of the proposed development to surrounding land uses;
 - How the proposed development may impact future development of the surrounding lands;
 - Impact of the proposed development on County servicing and transportation infrastructure;
 - Impact of the proposed development on stormwater management; and
 - How the proposed development may impact the County's targeted 65:35 ratio of residential to business development.

- c) Multiple unit *country residential developments* less than 4 hectares (9.9 acres), except for fragmented country residential development (refer to *Section 2.3.3*), should not be supported.
- d) *Country residential development*, with two or more dwelling units, is discouraged outside of Primary Residential Areas, including in agriculture areas.
- e) When an existing area structure plan that includes *country residential development* is undergoing a comprehensive review, the following shall be addressed:
 - i) Update all policies in accordance with the MDP, County policies, and other relevant County planning documents;
 - ii) Consider the inclusion alternative development forms, such as *compact residential development* or a *conservation design* community, which reduce the overall development footprint on the landscape; and
 - iii) Where *country residential development* is not being achieved as expected, the County should consider reducing the overall area dedicated to *country residential development*.

2.3.3 Fragmented Country Residential Development

Historical subdivision approval in parts of the County has resulted in fragmented and dispersed pockets of country residential lots. Incremental fragmented development can result in dividing viable agricultural land, which impacts agriculture operators, and creates an inefficient and unsustainable settlement pattern. From a fiscal perspective, dispersed country residential development requires increased road maintenance and threatens the fiscal sustainability of service providers such as the County and local school boards. Further fragmented country residential development should be avoided, and a gradual transition should be pursued to a more orderly and efficient development pattern within fragmented country residential areas.

- a) Within a *fragmented quarter section*, the redesignation of residential lots or agricultural parcels less than or equal to 4 hectares (9.9 acres) in size to a new residential land use may be supported if planning, consultation, and technical assessment information is provided to the satisfaction of the County and:
- i) Shows, at a minimum, all residential or small agricultural acreages that are adjacent to the application;
 - ii) Includes design measures to minimize adverse impacts on existing agriculture operations;
 - iii) Demonstrates potential connectivity to residential or small agricultural acreages outside of the plan area;
 - iv) Outlines the connection between internal and external road networks, water supply, sewage treatment, and stormwater management;
 - v) Contemplates the impact on off-site infrastructure, roads, and stormwater systems;
 - vi) Provides any other additional information or assessments as required by the County to support the application; and
 - vii) Documents the consultation process undertaken to involve affected landowners within the fragmented area in the preparation and/or review of the application.
- b) For development within a *fragmented quarter section*, an internal road to service a subdivision as per the plan may be required as a condition of subdivision.
- c) Within a *fragmented quarter section*, the redesignation or subdivision of agriculture parcels greater than 4 hectares (9.9 acres) in size to a residential use should not be supported.



Photo: Elpoca

2.4 Employment Area Development

Maintaining and expanding the range of employment opportunities available in Rocky View County while balancing the residential to business tax ratio are priorities of the County. The County has also made significant investments in servicing infrastructure to specific areas designated for industrial and commercial development. The policies contained in this section reflect the County's investments and a logical expansion of existing industrial and commercial areas in Rocky View County to maintain a healthy and diverse inventory of developable lands.

Objectives

The policies within the Employment Area Development Policy Area are to ensure the following objectives:

- A range of businesses are supported in Rocky View County, creating a strong, diversified, and sustainable economy.
- Large commercial and industrial businesses, including manufacturing and industrial operations, warehousing and logistics, and agricultural processing, should locate in the Employment Areas.
- The growth of innovative and sustainable business sectors are supported, including renewable energy generation and technology sector, value added agricultural services and products.
- Commercial industrial development in appropriate locations contributes to the viability of residential areas by providing community meeting places, enabling employment opportunities, and offering goods and services to the local area.
- Business development aligns with the County's financial, social, and environmental goals.
- An increased business assessment base supports the financial sustainability of the County's operations while reducing reliance on the residential tax base.

2.4.1 Employment Areas

A strong local economy provides multiple benefits to the County and its residents, including employment, local services for residents and visitors, vitality to communities, and taxes to support County services.

The MDP provides a number of *business areas* and development forms which will accommodate a variety of businesses wishing to locate in the county. Employment Areas contain regional business centres and highway business areas where the majority of large-scale commercial and industrial development should continue to be located. Their purpose is to provide regional and national business services, and local and regional employment opportunities. By focusing development in these locations, the County provides for orderly growth and economic efficiencies in the development of its transportation and infrastructure systems.

The Employment Areas identified in *Figure 2* benefit from most, if not all of the following characteristics:

- The presence of existing businesses and industries;
- An efficient road connection to the provincial highway network;
- Large parcel sizes are able to accommodate large-scale operations;
- Multiple transportation options are available (e.g. road, rail, air); and
- Regulated by existing statutory policy, and/or identified in annexation agreements.

The MDP supports and encourages a robust market-driven economy by facilitating economic development and providing planning policies that help foster private and public investment across the county. The development of Employment areas will significantly contribute to achieving the County's fiscal goals.

- a) Employment Areas, as identified in *Figure 2*, should have an adopted area structure plan in place prior to development.

- b) Large scale commercial and industrial developments, when feasible, should be directed to locate in identified Employment Areas as identified in *Figure 2*.
- c) ~~Encourage~~ The infilling or intensification of existing Employment Areas **should be encouraged** in order to complement other businesses, maximize the use of existing infrastructure, minimize land use conflicts with non-commercial and industrial uses, and minimize the amount of traffic being drawn into rural areas.
- d) Development in an Employment Area shall follow the County's Commercial, Office, and Industrial Design Guidelines.
- e) The expansion of Employment Area boundaries should require an area structure plan or an area redevelopment plan amendment.
- f) Development of additional Employment Areas, not identified on *Figure 2* should not be supported unless a need has been demonstrated based on all the following criteria:
 - i) The proposal has regional or national significance;
 - ii) Existing Employment Areas within the trade area of the proposed development are approaching full capacity, and the County has determined expansion of existing Employment Areas is not desirable;
 - iii) Existing Employment Areas within the trade area do not meet market demand;
 - iv) Land uses and target markets are clearly defined;
 - v) The proposed development meets the environmental and infrastructure goals and policies of the MDP;
 - vi) The proposed development has the potential to provide a substantial financial benefit to the County;
 - vii) The proposed development does not adversely impact environmentally significant areas and existing residential communities and agriculture operations;
 - viii) The proposed development is in close proximity to the provincial transportation network; and
 - ix) The proposed commercial or industrial development should adequately demonstrate a direct benefit from the additional employment opportunities for nearby hamlets or communities, and allow for the continued build-out of a full functioning suite of services for those communities.
- g) Applications to redesignate land for commercial or industrial uses outside of Employment Areas shall provide a rationale that justifies why the proposed development cannot be located in Employment areas.
- h) Proposals for business development outside of Employment Areas should:
 - i) Be limited in size, scale, intensity, and scope;
 - ii) Not compromise the viability of existing Employment Areas;
 - iii) Have direct and safe access to paved County roads or Provincial highway;
 - iv) Provide a Traffic Impact Assessment; and
 - v) Minimize adverse impacts on environmentally significant areas, and existing residential, business, or agricultural uses.
- i) Small scale *value-added agriculture* operations, on-farm diversified uses, *agriculture services*, natural resource extraction, and other agricultural businesses, as defined in relevant legislation or *County Policy*, may be supported outside Employment areas.
- j) Where Employment Areas are located along major highways they require additional planning considerations due to their proximity to regional transportation networks, and should be developed in consultation with Alberta Transportation.

2.4.2 Neighbourhood Serving Commercial

Commercial and light industrial development in appropriate locations contributes to the viability of Primary Residential Areas by providing social and community meeting places, enabling employment opportunities, and offering goods and services to the local area.

- a) New neighbourhood-serving commercial and light industrial development should:
 - i) Conform to the relevant area's structure plan, and the policies of the MDP; and
 - ii) Have minimal impact on adjacent land uses.
- b) Encourage the infilling or intensification of existing neighbourhood serving commercial areas in order to complement other businesses, maximize the use of existing infrastructure, minimize land use conflicts with agriculture uses, and minimize the amount of traffic being drawn into rural areas.
- c) Home based business shall be supported, as a self-employment opportunity for residents, and when they are in accordance with the applicable area structure plan, subordinate plan, and/or the Land Use Bylaw.



Photo: Colby Stopa

2.5 Hamlet Development

Rocky View's hamlets are home to the majority of the County's residents and provide services for the everyday needs. Hamlets should be the priority for residential development over the next 20 years, and their continued attractiveness as a place to live in Rocky View County will be predicated upon continued support for contextually sensitive commercial development, the provision of appropriate open spaces, and a range of housing options to support all types of households. The policies in this section encourage the development of hamlets to improve quality of life for residents and maximize the efficiency and cost effectiveness of municipal service infrastructure.

Objectives

The policies within the Hamlet Development Policy Area are to ensure the following objectives:

- A strong sense of community identity is maintained for hamlets.
- Diverse housing opportunities are available for all ages, incomes, and abilities.
- Community main streets and commercial areas add to the social fabric of the community, providing services to residents.
- An attractive, high quality built environment is developed and maintained to support connected and complete communities.
- Development over time results in an attractive, high quality built environment.
- County services are available to residents and businesses.

2.5.1 Hamlet Growth Areas

Hamlets in Rocky View County vary in size, appearance, and function, with each hamlet having a distinct character that reflects its location, history, and environment. Of these hamlets, Balzac West, Bragg Creek, Conrich, Elbow View, Glenbow, Harmony, and Langdon are recognized as Hamlet Growth Areas (as identified on *Figure 2*). These Hamlet Growth Areas, both existing and planned, will include a mix of land uses to provide housing, employment, community services, and recreation opportunities to local residents and a larger service area. Additional growth in these hamlets may be prioritized by the County due to their proximity to transportation networks, and availability of infrastructure, services, and amenities. Commercial uses will be supported in Hamlet Growth Areas to provide access to services for residents and provide employment opportunities.

While ASPs provide area-specific policy for many hamlets, the MDP provides County-wide policies to ensure development strengthens these communities, is sensitive to the needs of residents, and is orderly and sustainable.

- a) Development in Hamlet Growth Areas should be guided by, and conform to, the adopted area structure plan, area redevelopment plan, or conceptual scheme.
- b) All new *multi-lot* commercial, industrial, or residential subdivisions proposed within a Hamlet Growth Area should require the preparation of a master site development plan or conceptual scheme as per *County Policy*.
- c) An area structure plan or area redevelopment plan for a Hamlet Growth Area should address the following planning and design matters:
 - i) Future land use concept;
 - ii) The amount of remaining undeveloped land within existing boundaries;
 - iii) Population estimates and impact on existing services, infrastructure, and amenities;

- iv) Form, quality, design, and compatibility of proposed development;
 - v) Potential for enhancements to main streets, commercial areas, and community gathering places;
 - vi) Provision of parks, open space, amenities, and pathway connections;
 - vii) Impact on the environment and mitigation measures;
 - viii) Interface design with adjacent land uses; **and**
 - ix) Provision for future regional transit connections; **and**
 - x) **Intermunicipal collaboration on key cross-boundary concerns.**
- d) Encourage a variety of housing forms to be developed in Hamlet Growth Areas in order to provide a range of affordability and lifestyle opportunities for residents.
 - e) Encourage well-designed public gathering places that:
 - i) Are pedestrian and cyclist-friendly, safe, accessible, and attractive;
 - ii) Respect and enhance community identity and character;
 - iii) Address the needs of residents of all ages and abilities; and
 - iv) Enable passive and active recreation and cultural activities.
 - f) The expansion of a Hamlet Growth Area boundary should only be considered when 50% of the gross area has been developed, and shall require an amendment to the local area structure plan.
 - g) The County should develop main street commercial guidelines and future development should comply with these guidelines.
 - h) Hamlet main streets or central business areas are encouraged to develop with a consistent urban design theme that is pedestrian friendly.

2.5.2 Small Hamlets

Hamlets across Rocky View County range from those with a wide variety of services and relatively steady growth, like Hamlet Growth Areas, to those with fewer services and lower levels of growth. These Small Hamlets include Bottrel, Cochrane Lake, Dalemead, Dalroy, Delacour, Indus, Kathyrn, Keoma, Indus, and Madden. They form a traditional part of the County's rural landscape, each with their own distinct character. The County will continue to maintain existing levels of service for these rural communities, ensuring sustained quality of life for residents. Due to their more isolated location, and the availability of more sustainable development locations across the county, the County may not prioritize infrastructure and servicing upgrades in Small Hamlets. However, additional growth that is in keeping with the character of these hamlets is appropriate.

- a) New development should occur within the existing hamlet boundary as opposed to expanding boundaries.
- b) Commercial development, if appropriately scaled to the surrounding area, should be supported to provide services to meet the day-to-day needs of residents or local businesses.
- c) Development of Small Hamlets should be guided by, and conform to, **the** existing applicable area structure plan or conceptual scheme.
- d) Development of Small Hamlets without an existing applicable area structure plan or conceptual scheme should be guided by the policies and direction of the MDP, and other applicable County policies and bylaws.
- e) Encourage a variety of housing forms to be developed in Small Hamlets in order to provide a range of affordability and lifestyle opportunities for residents.

- f) Encourage well-designed public gathering places in hamlets that:
- i) Are pedestrian and cyclist-friendly, safe, accessible, and attractive;
 - ii) Respect and enhance community identity and character;
 - iii) Address the needs of residents of all ages and abilities; and
 - iv) Enable passive and active recreation and cultural activities.
- b) If applicable, institutional and community land uses should be developed in accordance with the appropriate area structure plan or conceptual scheme.
- c) Proposals for institutional and community land uses that are not within the areas identified in Policy 2.6.1 a) will be considered if the following is addressed:
- i) Justification of the proposed location;
 - ii) Demonstration of the benefit to the broader public;
 - iii) Compatibility and integration with existing land uses or nearby communities; and
 - iv) Infrastructure with the capacity to service the proposed development.
- d) When area structure plans or conceptual schemes are prepared or amended, the planning process shall address the need for institutional and community land uses, and where appropriate, consult with school boards and other relevant partners.
- e) Redesignation and subdivision applications for institutional and community land uses should provide:
- i) An operational plan outlining details such as facility hours, capacity, staff and public numbers, facility use, and parking requirements; and
 - ii) A master site development plan which addresses servicing and transportation requirements and ensures the site is of sufficient size to accommodate the parking requirements as set out in the Land Use Bylaw.

2.6 Institutional and Community Land Use

Institutional and community land uses contribute to vitality of communities and support quality of life for residents by serving culture, education, health, religious, recreation, and social needs.

Objectives

The policies within the Institutional and Community Land Use Policy Area are to ensure the following objectives:

- Institutional and community land uses support the needs of residents, are appropriately located, are well designed, and contribute to the vitality of communities.
- New institutional and community uses, that are compatible with surrounding land uses, are supported to serve the public's interest.

2.6.1 Institutional and Community Policies

- a) Institutional and community land uses should locate in Hamlet Growth Areas, Small Hamlets, Primary Residential Areas, or Employment Areas.

SECTION 3:

COUNTY-WIDE POLICIES

The County provides infrastructure and community services that contribute to economic development, public safety, and quality of life. Providing these services, however, can be challenging due to the County's vast expanse. Residents and businesses are dispersed across an area of 3,885 km² (960,000 acres) at low densities, challenging the County, landowners, and developers to build and grow communities in an orderly, sustainable fashion that coincides with the appropriate provision of municipal infrastructure and community services. Satisfying these aspirations will involve the assessment of community needs across the County, **encouraging homeowners' associations to manage assets**, partnerships with community stakeholders and service providers, recruitment of regional institutions, public consultation, and allocation of land and resources.

Collectively, the policies of this section aspire to maintain infrastructure, support a thriving economy, and improve services to strengthen community identity and enhance quality of life.

3.1 Financial Sustainability

The cost of building communities, providing services, and operating County facilities is dependent on factors such as location, infrastructure needs, and residents' desire for services. While developers are responsible for the upfront costs of development, long-term operating costs related to providing soft infrastructure, **emergency services**, maintaining and replacing infrastructure, and services to residents are typically paid for by the residential and business property tax base, user fees, and provincial grants. For Rocky View County to be financially sustainable, development should pay for itself and be affordable over the long term. This reduces financial risk to County ratepayers and mitigates potential economic risks.

Objectives

The policies within the Financial Sustainability Policy Area are to ensure the following objectives:

- The financial sustainability of the County is maintained through careful management of growth and development.
- Development costs are primarily the responsibility of the developer.
- Business development is leveraged to reduce reliance on the residential tax base.

3.1.1 Financial Sustainability Policies

- a) New development should be directed to areas with existing infrastructure, where feasible.
- b) On-site and off-site *hard infrastructure* costs related to new development shall be the responsibility of developer.
- c) Where deemed appropriate the County may require developers to build or contribute to the building of *soft infrastructure* (e.g. recreation amenities, libraries, schools).

- d) *Soft infrastructure* needs resulting from growth should be identified **by developers and the County in advance of new development**, and methods to finance those needs prepared **prior to approvals in advance of new development**.
- e) **The County should develop and adopt policy on the requirements and use of a fiscal impact model and a utility infrastructure cost feasibility and life cycle analysis for the purpose of:**
- i) **Assessing** development applications;
 - ii) **Allowing** consistent comparison between projects; and
 - iii) **Measuring** the county-wide impact of growth.
- f) Depending on the scope and scale of a proposed development, a fiscal impact analysis of the proposed development may be required, in accordance with *County policy*. **The fiscal impact analysis will:**
- g) An applicant proposing to provide utility infrastructure may be required to provide a cost feasibility and life cycle analysis detailing operating and replacement costs in accordance with *County Policy*.
- h) Prior to approving a development proposal, the County should ensure that **infrastructure servicing has been identified and planned for, and that** full cost recovery methods are in place to capture the capital and interest cost of development.
- i) The County will commit to continued assessment base diversification and should strive to achieve an *Assessment Split Ratio* of 65% residential and 35% business County-wide through careful consideration of development applications **and area structure plans**.
- j) Facilitate economic development by linking investors and developers to investment opportunities, providing assistance where feasible, and reducing barriers to companies wishing to invest in the County.
- k) Utility operational and life cycle costs may be recovered through user fees from those benefiting from the service.

3.2 Transportation

Transportation networks facilitate the movement of people and goods throughout Rocky View County. Vehicular traffic is the primary method of transportation in the County, while airports and railroads also facilitate the movement of goods and people. A pathway system in areas of the County provides active transportation opportunities.

The County will continue to accommodate the movement of people and goods safely and efficiently. As growth in the County increases, however, more pressure will be placed on the transportation system, creating unique challenges to ensure development and transportation infrastructure is compatible and complementary. The policies in this section outline how the County will develop and maintain a transportation network that allows for efficient and safe travel through the County for all modes.

Objectives

The policies within the Transportation Policy Area are to ensure the following objectives:

- Existing development and future growth areas are supported through a transportation system that prioritizes safety and fiscal sustainability.
- The County's transportation infrastructure is developed in a safe, efficient, equitable, and cost-effective manner.
- Communities are served by a well-designed and integrated transportation network that facilitates different modes of travel.

3.2.1 Transportation Planning and Development

- a) Partner and co-operate with the Province and neighbouring municipalities to maintain and improve, where necessary, regional transportation corridors.
- b) Partner with other municipalities and developers to co-ordinate transportation improvements and the expansion of transportation infrastructure.
- c) Transportation network development shall be based on existing development, future growth areas, area structure plans, and interconnectivity with adjacent municipalities.
- d) Where extensions to the transportation network are required as a result of development, the developer shall fund all required improvements.
- e) Ensure the County's Transportation Model remains current and relevant through regular reviews and updates. The Transportation Model will anticipate, and plan future transportation networks based on:
 - i) Existing development patterns;
 - ii) Identified growth areas;
 - iii) Changing transportation modes, patterns, and volumes; and
 - iv) Provincial and adjacent municipal transportation networks and plans.
- f) New development shall make use of and extend the existing transportation network/ infrastructure, where feasible.
- g) Roads, pathways, and trails should connect adjacent neighbourhoods within developed areas.
- h) Consider connections to existing, planned and future local and regional transit when developing or amending area structure plans and conceptual schemes.
- i) Residential redesignation and subdivision applications should provide for development that:
 - i) Provides direct access to a road, while avoiding the use of panhandles;
 - ii) Minimizes driveway length to highways/ roads;
 - iii) Removes and replaces panhandles with an internal road network when additional residential development is proposed; and
 - iv) Limits the number and type of access onto roads in accordance with *County Policy*.
- j) Road service and maintenance levels will be based on road classification and traffic volume, in accordance with *County Policy*.
- k) Requests for a higher level of maintenance and service beyond the core level shall be based on a user pay principal.
- l) New development shall accommodate the transportation of agriculture equipment or products.
- m) **Work with intermunicipal partners to identify and prioritize investment in the expansion of regional corridors imperative for future traffic management.**

3.2.2 Pedestrian and Cycling Networks

- a) Expand and improve cycling and pedestrian networks, including pathways, trails, sidewalks bicycle lanes located within a road right-of-way in developed and developing areas.
- b) Support the long-term development of the conceptual regional pathway and trail plan as identified in applicable recreation, parks, and transportation plans.

3.2.3 Airports

- a) Industrial, commercial, or large-scale residential development associated with the operation of an airport shall be comprehensively planned as part of an area structure plan.
- b) The following land uses may develop adjacent to an airport without an area structure plan if the use does not adversely affect the airport operation:
 - i) General agricultural operations;
 - ii) Recreational land uses, or
 - iii) Farmsteads and *first parcels out*.

3.2.4 Railways

- a) Area structure plans and conceptual schemes in close proximity to active rail lines should provide the minimum building setback and buffering requirements requested by the rail line owners.
- b) Abandoned railway corridors should be reclaimed and considered for incorporation into the parks and open space system following an environmental impact assessment.

3.3 Natural Resource Development

The extraction and use of natural resources in Rocky View County is an important contributor to the local economy. However, resource extraction can also significantly impact adjacent land uses and the natural environment, requiring careful consideration for how extraction is planned and implemented. Aggregate (sand and gravel) extraction, oil and gas extraction, and renewable energy generation can cause community concern and when developed, should minimize impacts on surrounding land uses.

Objectives

The policies within the Natural Resources Development Policy Area are to ensure the following objectives:

- Future natural resource extraction development balances the needs of residents, industry, and the County.
- Negative impacts on the environment from resource extraction are mitigated.

3.3.1 Aggregate Extraction

- a) Minimize the adverse impact of aggregate resource extraction on existing residents, adjacent land uses, and the environment.



Photo: Epgui

- b) Encourage collaboration between the County, the aggregate extraction industry, and impacted residents and landowners to develop mutually agreeable solutions that mitigate impacts of extraction activities.
- c) Discourage residential development that may be impacted by future aggregate extraction and related industrial uses.
- d) Direct all aggregate related traffic to identified major haul routes that are monitored and appropriately maintained.
- e) Where aggregate activities are located in proximity to an adjacent municipality, the County should co-operate with that jurisdiction to ensure co-ordination of major haul routes and mitigation of impacts on adjacent land uses.
- f) Applications for aggregate extraction shall prepare a master site development plan.
- g) Consider co-locating other complementary industrial uses adjacent to aggregate extraction sites.
- h) Support the reclamation of aggregate extraction sites back to their prior natural or agricultural state, but consider successional transitions of aggregate extraction sites to other industrial and complementary uses (e.g. waste transfer or processing facilities).

3.3.2 Oil and Gas

- a) When considering applications for development, provincial setback regulations and guidelines shall be applied respecting petroleum wells, sour gas facilities, pipelines, and other oil and gas facilities.
- b) Encourage the Province and industry to efficiently and effectively remediate abandoned well sites and pipelines.

3.3.3 Renewable Energy

- a) Support the development of *renewable energy* production projects as a means to diversify the County's economy.

3.4 Agriculture

Agriculture has been an important component of the County's economy since the early 1900's. Most hamlets in Rocky View County were established as places to trade livestock and grain and provide services to the surrounding area. While the MDP recognizes agriculture as vital to the County's economy and cultural identity, diversification and innovation within the sector will become increasingly important to build a thriving economy and additional employment opportunities.

Objectives

The policies within the Agriculture Policy Area are to ensure the following objectives:

- The agriculture sector remains an important component of the county's economy.
- Adverse impacts on agriculture from non-agricultural land uses are minimized.
- New forms of agriculture innovation and diversification are encouraged through land use policy.

3.4.1 Agriculture Policies

- a) Support land use applications for new, innovative agricultural ventures that may require unique planning solutions when they support the vision and guiding principles of the Plan.
- b) Encourage small scale, *value-added agriculture* and *agriculture services* to locate in proximity to complementary agricultural producers.
- c) Encourage large-scale value-added agricultural industries and related manufacturing to develop in identified Employment Areas.
- d) Support the viability and flexibility of the agriculture sector by allowing a range of parcel sizes, where appropriate.
- e) Discourage intrusive and/or incompatible land uses in *agricultural areas*.

- f) Applicants proposing new residential, institutional, commercial, and industrial land uses shall design and implement measures to minimize their adverse impacts on existing agriculture operations, based on the County's Agriculture Boundary Design Guidelines.

3.4.2 Redesignation and Subdivision for Agricultural Purposes

- a) Redesignation and subdivision of agricultural land should be supported if the proposal:
- i) Has direct access to a developed public roadway;
 - ii) Minimizes adverse impacts on agricultural operations by meeting ~~agriculture location~~ and Agriculture Boundary Design Guidelines;
 - iii) Maintains the balance of the land as an agricultural use;
 - iv) Provides a planning rationale justifying why the existing parcel size cannot accommodate the proposed new development;
 - v) Demonstrates that the land can support the proposed development;
 - vi) Demonstrates its benefit to the County and agricultural industry;
 - vii) Assesses the impact of the proposed development on, and potential upgrades to, County infrastructure; and
 - viii) Assesses the impact of the proposed development on the environment including air quality, surface water, and groundwater.
- b) Discretionary agriculture land uses may be supported where there are existing concentrations of agricultural resources, markets, animal types, agriculture related industries, or other discretionary land uses as identified in the Land Use Bylaw.

3.4.3 Confined Feeding Operations

- a) Land uses incompatible with the operation of a *confined feeding operation* shall not be supported when proposed within the *minimum distance of separation* of the *confined feeding operation*.
- b) A *confined feeding operation*, including its *minimum distance of separation*, ~~should~~ shall not be located within the boundary or *notification zone* of any intermunicipal development plan, ~~neighbouring municipality~~, statutory planning area, hamlet, residential area, institutional use, or federal, provincial, or municipal park or recreation area.

3.5 Environment

County residents have a strong connection to the natural environment and value the County's waterways, natural areas, and parks. However, as residential, commercial, and industrial development continues, the impact on the environment increases.

The MDP's Growth Concept (*Figure 2*) identifies areas with valuable environmental features (e.g. wildlife corridors, environmentally sensitive areas) that should be studied further when development is proposed in these locations, to minimize the adverse impacts of development on the environment. The MDP's policies in this section are guided by the following provincial direction:

- **Municipal Government Act:** Provides the legislative framework for statutory plans that maintain and improve the quality of the physical environment.
- **Land Use Framework Strategy:** Encourages conservation, land stewardship, healthy ecosystems, and the efficient use of land.
- **Water for Life Strategy:** Outlines the Government of Alberta's commitments to manage and safeguard Alberta's water resources, and includes goals of ensuring a safe, secure, drinking water supply; healthy aquatic ecosystems; and reliable, quality water supplies for a sustainable economy.

Objectives

The policies within the Environment Policy Area are to ensure the following objectives:

- Private development and County operations maintain and improve the quality of the natural environment.
- Drinking water sources are protected.
- Stormwater and wastewater are managed to protect surface water, riparian areas, and wetlands.
- **Mitigate the impacts of a changing climate on future development through thoughtful planning.**

- Land use planning protects agricultural operations, environmentally sensitive areas, and wildlife corridors.
- Measures to improve water use, reduce land consumption, and increase building energy efficiency are implemented.

3.5.1 Growth Management

- a) Where development is proposed near potential *Ecological Features* identified in the Growth Concept (*Figure 2*), development applications may require the preparation and implementation of a bio-physical impact assessment to identify potential negative impacts and mitigation measures.
- b) Support and participate in environmental management initiatives undertaken by:
 - i) Watershed councils and water stewardship groups; and
 - ii) Agricultural and regional invasive weed management groups.

3.5.2 Water

- a) Protect ground water and ensure use does not exceed *carrying capacity* by:
 - i) Supporting long term ground water research and monitoring programs;
 - ii) Mitigating the potential adverse impacts of development on groundwater recharge areas;
 - iii) Adhering to provincial ground water testing requirements, as part of the development approval process; and
 - iv) Encouraging and facilitating the capping of abandoned water wells to protect against ground water leakage and cross contamination.
- b) Use relevant watershed management plans as guiding documents and planning tools.

- c) Establish further tools and strategies to address regional source water concerns in partnership with other municipalities.

3.5.3 Stormwater and Wastewater

- a) Development should incorporate *low-impact development* management practices that effectively treats stormwater to protect watersheds and surface/ground water quality.
- b) Wastewater treatment systems ~~should~~shall not exceed the land's *carrying capacity*.
- c) Stormwater treatment and storage facilities should:
 - i) Avoid the use of natural wetlands; and
 - ii) Locate away from existing floodways and riparian areas.
- d) Support the use of constructed stormwater wetlands for treatment and storage of stormwater.
- e) ~~Where possible, and when available, reuse water.~~

3.5.4 Land and Environmental Stewardship

- a) Encourage development to retain and reintroduce natural habitat and native species, ~~contributing to the preservation of biodiversity and increasing carbon sequestration.~~
- b) Development shall be planned, designed, and constructed to protect alluvial aquifers.
- c) The use of Transfer Development Credits, if applicable, may be applied as a way to direct development to preferred growth areas in order to sustain environmentally sensitive areas and achieve *compact residential development*.
- d) Environmental site assessments shall be required when a previous use may have contaminated the proposed development area.
- e) Utility systems shall be designed and constructed to minimize adverse impacts to environmentally sensitive areas, as identified by a Biophysical Impact Assessment.

3.5.5 Development in Hazard Areas

- a) ~~Development in hazard areas (e.g. flood fringes, escarpments) is strongly discouraged and should only be allowed if an appropriate technical evaluation demonstrates suitability, to the satisfaction of the County and in accordance with the Land Use Bylaw.~~
- b) ~~Development within the flood fringe is discouraged and, where allowed, shall comply with the Land Use Bylaw.~~
- c) Incorporate updated Provincial hazard area mapping into County planning processes as it becomes available.
- d) No development shall take place within the floodway or flood fringe, with the following exceptions:
 - i) Essential roads and bridges that have to cross the flood risk area;
 - ii) Flood or erosion protection measures or devices;
 - iii) Pathways that are constructed level with the existing natural grades;
 - iv) Recreation facilities, provided there are no buildings, structures, or other obstructions to flow within the floodway; and
 - v) Essential utility infrastructure that has to be located in the flood risk area for operational reasons.
- e) Proposed development within the floodway or flood fringe areas should provide a flood hazard risk study, including hazard mapping where appropriate and prepared by a qualified professional. The study should:
 - i) Identify areas at a flood risk of 1:100 or greater, and those having a lesser flood risk between 1:100 and 1:1000.
 - ii) Demonstrate that there is sufficient developable area for the proposal after excluding flood way and flood fringe areas.

- iii) Provide recommendations on locating more vulnerable developments towards lower flood risk areas (greater than 1:1000, where possible) and on implementing other measures that would limit flood risk.

3.5.6 Construction Practices

- a) Development should build with the contours of the land and avoid stripping and grading, where possible.
- b) Construction best practices to reduce wind and water erosion of soils and to suppress dust dispersion shall be required.
- c) Encourage the use of construction practices that minimize greenhouse gas emissions.

3.5.7 Conservation

- a) Encourage green building techniques and energy efficiency in building design.
- b) Maintain dark skies by:
 - i) Ensuring dark sky principles are incorporated when developing or amending area structure plans;
 - ii) Requiring public and business lighting in outdoor areas to be downward directed and conform to the Land Use Bylaw; and
 - iii) Encouraging residents to use downward directed lighting.
- c) Provide convenient, cost effective, and environmentally responsible ways to reduce, reuse, and recycle household waste.

3.6 Utility Services

Utility services include a range of County infrastructure that provides residents and businesses with key services such as water, sewer, communications, and power. Traditionally, the County has relied on stand-alone utility systems, such as groundwater wells and septic fields. As development intensifies, however, piped methods of servicing will become necessary in certain areas. The need to design stormwater management systems to consider catchment areas beyond a site-specific solution has become increasingly important and should be facilitated by master planning.

Well-designed and effective utility services are key components of well-planned developments. Utility systems must be designed and constructed in a manner that is safe and reliable, while not adversely impact neighbouring lands.

Objectives

The policies within the Utility Services Policy Area are to ensure the following objectives:

- Existing communities and growth areas are connected to effective and fiscally sustainable utility systems.
- Private and public utility systems are developed and operated in a safe and reliable manner.
- Wastewater disposal practices protect watersheds, surface water, and groundwater quality.
- Stormwater management systems do not adversely impact the environment or other adjacent land uses.

3.6.1 Utility Systems

- a) New development utility systems shall adhere to provincial regulations, and the relevant *County Servicing Standards* and servicing master plans.
- b) Allow a variety of water, wastewater, and stormwater treatment systems, in accordance with provincial/federal regulations and the *County Servicing Standards*.
- c) Partner and co-operate with other jurisdictions, regional service commissions, and other levels of government to ensure efficient and integrated utility systems are established and maintained.
- d) Partner with other municipalities and developers to co-ordinate enhancements and expansion of existing utility services and infrastructure.
- e) Major utility corridors for pipelines and power lines should avoid residential areas wherever possible and minimize adverse impacts on agriculture operations and the environmentally sensitive areas.

3.6.2 Water Supply

- a) Water well performance and deliverability testing shall be required of all development relying on ground water, in accordance with the *County Servicing Standards*.
- b) A new regional or decentralized water system, required as part of a development approval, shall be transferred to County ownership, in accordance with the *County Servicing Standards*.
- c) To achieve consistency in water supply systems, the County shall consider negotiating public ownership of existing private water licenses and infrastructure in cases where it is fiscally prudent to do so, the existing system meets **current** regulatory standards, and the existing system is in good operating order.

3.6.3 Wastewater Management

- a) New development shall provide wastewater treatment in accordance with the *County Servicing Standards*.
- b) Wastewater treatment systems shall not exceed the land's *carrying capacity*. When proposing such systems, consideration shall be given to the following requirements:
 - i) Development proponents shall assess the land's *carrying capacity* to determine system requirements in accordance with the *County Servicing Standards*. The type of private on-site wastewater treatment system will be dependent on lot density, lot size, and soil capability; and
 - ii) Construction and connection to a regional or decentralized wastewater treatment system may be required when the density of development exceeds thresholds identified in the *County Servicing Standards*.
- c) The ownership, operation, and maintenance of private on-site wastewater treatment systems, or wastewater holding tanks shall be the responsibility of the landowner.
- d) Ownership of a new regional or decentralized wastewater infrastructure system, required as part of a development approval, shall be transferred to the County in accordance with the *County Servicing Standards*.

3.6.4 Stormwater Management

- a) To achieve consistency in wastewater management systems, the County may negotiate public ownership of existing private approvals and infrastructure in cases where it is fiscally prudent to do so, the existing system meets regulatory standards, and the existing system is in good operating order.
- b) Stormwater shall be managed in accordance with provincial regulations. Where required and in accordance with provincial approvals, on-site

stormwater may be effectively released into a downstream receiving water body in accordance with the following requirements:

- i) Stormwater shall be conveyed downstream in a manner that protects downstream habitat and properties; and
 - ii) Where required, proponents of new development shall identify and secure the downstream stormwater conveyance system.
- c) Stripping, grading, or the placement of fill shall not alter the existing pattern of stormwater storage and/or movement across private land unless the activity complies with the Land Use Bylaw and a development permit has been issued for such activity.
 - d) Stormwater ponds required for stormwater storage and treatment shall be provided as per the *County Servicing Standards*.
 - e) Continue to collaborate in supporting the Co-operative Stormwater Management Initiative to move rather than store water.

3.7 Solid Waste

The dispersed population of the County, coupled with the unique types of solid waste generated by the agricultural industry, has led to innovative approaches to garbage disposal and recycling in Rocky View. The County's Waste Management Strategy goal is to provide every household with convenient access to easy, environmentally responsible, and cost-effective ways of reducing, reusing, recycling, and disposing of their solid waste. The County is committed to reducing the amount of waste that is disposed in landfills by promoting more sustainable practices.

Objectives

The policies within the Solid Waste Policy Area are to ensure the following objectives:

- Convenient, cost effective, and environmentally responsible ways to reduce and recycle household waste are available within the county.
- Opportunities to recycle results in more material diverted from landfill.

3.7.1 Solid Waste Policies

- a) Co-ordinate with neighbouring municipalities in providing solid waste disposal services and recycling opportunities to County residents.
- b) Support and promote markets and industries that consume recyclables and/or actively minimize waste.
- c) Ensure the County's waste collection stations provide a wide variety of waste disposal and recycling options.
- d) Invest in recycling and composting facilities that can process household recyclable products (e.g. biodegradable plastic).
- e) Provide waste collection stations that are accessible, user-friendly, efficient, and cost effective.
- f) Provide for the year-round drop off and disposal of household hazardous wastes.
- g) Provide agriculture operators with waste and recycling services and options specific to the agriculture industry.
- h) Encourage and promote construction practices that are consistent with sound waste management practices.



Photo: Colby Stopa

3.8 Public Space

Parks, pathway and trail networks, and recreation facilities enrich Rocky View County by contributing to community building, preserving and protecting natural landscapes, and providing residents with recreation opportunities that contribute to health and wellbeing. The MDP supports the development and protection of these amenities by providing guidance on development along park boundaries, the expansion of the parks and open space system, pathway and trail linkages, and community amenity design and construction.

Objectives

The policies within the Public Space Policy Area are to ensure the following objectives:

- Parks and open spaces, and pathways and trails are well designed, connect communities, and accommodate residents' recreational and cultural needs.
- Land for parks and open spaces, pathways and trails, schools, recreational amenities, and environmental reserves are acquired through purchase, land dedication, and donations.
- A variety of partnerships extend the range of recreation facilities available to County residents.
- Rocky View partners and collaborates with neighbouring municipalities and other organizations in the development, use, and maintenance of recreation facilities, parks, pathways, and trails.
- Transition areas between parks and adjacent uses are well designed and do not detract from park functions.
- Where appropriate, limited development of recreational amenities may occur in hazardous areas, such as ravines and floodways.
- The natural environment is protected through the dedication of environmental reserves.

3.8.1 Park Development, Connectivity, and Maintenance

- a) Strategies and priorities to finance parks and open spaces, and pathways and trails through both County and non-County funding measures should be guided by applicable *County Policy* and plans.
- b) Partner and collaborate with adjacent municipalities, the Province, school divisions, conservation agencies, community groups, developers, and other organizations to develop and maintain the parks and open space system, pathways and trails network, and associated amenities.
- c) Encourage multi-functional and joint use parks and recreation facilities projects wherever possible.
- d) Where parks are proposed as part of a development, the developer shall assume all costs associated with developing the park.
- e) At the discretion of the County, ongoing park maintenance shall be provided by the County or local homeowners associations.
- f) A life-cycle fund should be used to assist with capital replacement and repair costs in parks.
- g) Acquire land for parks, open space, pathways, trails, and recreational and cultural amenities through such means as:
 - i) Dedication of reserve;
 - ii) Land purchase;
 - iii) Easements and rights-of-way; and
 - iv) Donations, endowment funds, and land swaps.

3.8.2 Park and Open Space Design and Standards

- a) The County should provide and apply design principles and standards for the design, construction, maintenance, and operation of parks, open space, pathways applicable to the development, trails, and associated amenities through applicable *County Policy* and plans.
- b) Connect wildlife corridors, waterbodies, environmentally significant areas through protected parks and open spaces.
- c) Improve connectivity to parks and open spaces through expansion of pathway and trail networks.
- d) Connect residential communities, institutional, commercial, and industrial areas by pathways and trails where feasible.
- e) The function and aesthetic value of parks and open spaces, pathways, and trails should be enhanced and not negatively impacted by adjacent development.
- f) Ensure the location, design, and scale of residential, institutional, commercial, and industrial development is sensitively integrated with adjacent parks and open space, trails, and pathways in a comprehensive and supporting manner.
- g) Development proposals adjacent to provincial parks, County parks and open space, pathways, and trails should include:
 - i) Shared and mutually supportive facilities and/or amenities, where appropriate;
 - ii) User and operational access;
 - iii) Stormwater management;
 - iv) Preserving viewsapes into and within the park, where appropriate;
 - v) Vegetation and invasive species management; and
 - vi) Wildlife management.

3.8.3 Municipal Reserves

- a) The County shall follow the Municipal Government Act's policies regulating the dedication of municipal reserves.
- b) The County may defer all or a portion of the required reserves by registering a deferred reserve caveat when the reserve could be provided through future subdivision.
- c) The acquisition, deferral, and disposition of reserve land, and use of cash-in-lieu shall adhere to *County Policy*, agreements with local school boards, and the requirements of the Municipal Government Act.
- d) Reserves should be provided to the maximum amount allowed by the Municipal Government Act.
- e) The County may accept a voluntary dedication of reserve land beyond the maximum amount allowed by the Municipal Government Act. Over-dedication of reserve land may be used to support the development of a compact residential community or another need identified by the County.
- f) When assessing the proposed dedication of reserve land, the dedication should meet the present or future needs of the County by considering the recommendations of the MDP, applicable recreation and park master plans, area structure plans, conceptual schemes, and local school boards.
- g) The size, type, location, and shape of reserve land shall be suitable for school use and/or public use, and accessible to the public, and align with County needs or policies, where appropriate.
- h) When determining the amount, type, location, and shape of the reserve land within an intermunicipal development plan area, the adjacent municipality shall be consulted prior to determining the reserve requirement.

- i) The County shall not dispose of reserve land in an intermunicipal development plan area without prior consultation with the appropriate municipality.
- j) Within urban growth corridors, the preferred methods of providing municipal and/or school reserve shall be by land dedication or registration of deferred reserve caveats on title.

3.8.4 Environmental and Conservation Reserves and Easements

- a) Environmental reserves or environmental reserve easements shall be taken at the time of subdivision, in accordance with the Municipal Government Act, on lands designated for:
 - i) Residential, business, or institutional uses;
 - ii) On agricultural parcels less than 12 hectares (29.65 acres); or
 - iii) As determined by the County.
- b) Where the County determines public use is not desirable or where management of public land by the County is not required, land qualifying as an environmental reserve may be designated as an environmental reserve easement in accordance with the Municipal Government Act.
- c) A voluntary conservation easement, in accordance with the Alberta Land Stewardship Act, may be used to preserve areas that do not qualify as environmental reserve or environmental reserve easements under the Municipal Government Act. The conservation easement may be executed as a legal agreement between the private landowner and the County or a conservation organization.
- d) The County shall follow the Municipal Government Act's policies regulating the dedication of conservation reserves.

3.8.5 Recreation

- a) Support recreation facilities and facility development as guided by applicable recreation master plans.
- b) Prioritize recreational needs based on the findings of the County-wide Recreational Needs Assessment.
- c) Prioritize investment in recreational infrastructure based on population density and identified resident needs.
- d) Encourage local community groups to assist with the management of local park and recreation facilities and enter into maintenance and operation agreements with community groups when this occurs.
- e) Collaborate with neighbouring municipalities for regional recreation decision-making.

3.9 Services and Partnerships

The County's ability to provide services for its residents is limited by fiscal constraints, a dispersed population, and a large service area. In response to this challenge, the County has developed strong partnerships with senior levels of government, adjacent municipalities, local communities, water/utility commissions, and grass roots organizations. The benefits of the County building partnerships are numerous, including:

- Enhancing and leveraging service dollars.
- Broadening the range of services available to residents.
- Providing new service ideas and best practices.
- Contributing to community building and resilient communities.
- Enabling partnering municipalities to increase their overall level of service.

Strengthening and developing new partnerships will help to increase the capacity of the County to provide important services, while building more resilient communities and greater access to recreation and cultural amenities.

Objectives

The policies within the Services and Partnerships Policy Area are to ensure the following objectives:

- Services provided are of high quality.
- Through partnerships, residents are able to access a broad range of recreation and community programs and services.
- Strong partnerships are maintained with adjacent municipalities, other levels of government, school boards, communities, and stakeholders.
- Communities are strengthened and enhanced by supporting volunteerism, collaboration, social networks, and community participation.
- Efficient fire and protective services support safe communities.
- Fire and protective services are optimized by collaborating and partnering with neighbouring municipalities and other organizations.



3.9.1 County Services and Partnerships

- a) The County should develop and identify core services.
- b) Service levels beyond the established core level should be financed in accordance with a user pay model.
- c) Maintain and grow existing partnerships to extend County financial resources, provide a greater variety of services, and extend service coverage.
- d) Actively seek out new partnerships to address ongoing and emerging needs.
- e) Support and encourage volunteerism, social networks, and community-based initiatives in order to build connections between individuals and maintain and manage community amenities, programs, and services.
- f) Encourage private sector donations, private-public sector partnerships, developer contributions, endowment funds, and other sponsorships to develop and sustain community facilities, services, and amenities.
- g) Continue the County's Family and Community Support Services (FCSS) program to provide funding to non-profit organization that enhance the social well-being of individuals and families.

3.9.2 Emergency Services

- a) Co-operate and partner with neighbouring municipalities to develop integrated plans and agreements regarding fire prevention measures and firefighting services.
- b) Maintain strong collaborative relationships with the Royal Canadian Mounted Police (RCMP), Alberta Sheriffs, and the Calgary and Cochrane Humane Societies.
- c) Explore new partnerships to address on-going and emerging protective service issues.
- d) Land use planning, subdivision design, and lot development shall address fire prevention and fire control factors.
- e) Ensure subdivision and development plans provide safe and efficient access for emergency service vehicles.
- f) Prepare and update, as required, a Master Fire Plan.
- g) Encourage private water suppliers to construct distribution systems designed for the suppression of fire.
- h) Develop and maintain measures to prevent and control wildland fires, including public education, design of efficient emergency access, and measures to effectively slow fire growth.

3.10 Arts and Culture

Quality of life is enhanced when Rocky Viewers are able to access a variety of social and cultural opportunities. Strong social connections and networks can support personal health and wellbeing and the County is committed to facilitating and promoting social infrastructure for community cohesion and inclusion. Social infrastructure includes the activities, organizations, facilities, services, and amenities that develop and maintain a sense of community identity and community belonging and support quality of life.

For Rocky View County to build healthy, sustainable communities that continue to attract people who expect a high quality of life, the responsibility for building and maintaining a strong social infrastructure needs to be shared across organizations and stakeholders. This requires partnerships, co-operation, and support from all levels of government, neighbouring municipalities, community groups, non-governmental organizations, and individual residents.

Objectives

The policies within the Arts and Culture Policy Area are to ensure the following objectives:

- Social and cultural services are available for residents of all ages, regardless of their socio-economic or cultural backgrounds.
- Social connections are cultivated between residents through the County's support of volunteers, social networks, and local leadership.
- Social and cultural services are developed, enhanced, and managed through a wide variety of partnerships.

3.10.1 Arts and Culture Policies

- a) Support projects and programs that develop a sense of community, empower residents, and encourage social inclusion.
- b) Recognize and support the important role community leaders play in providing services to their community.
- c) Promote accessible community and public building design that assists residents to be safe, healthy, and form positive relationships.
- d) Recognize the value of culture as an economic contributor to the county and the role it plays in enhancing residents' quality of life, health, and sense of well-being.
- e) Support and promote cultural programs, activities, and facilities that generate a sense of community pride and local identity.
- f) Recognize and enhance the cultural heritage of the county by:
 - i) Celebrating the county's rural, Indigenous, and Western heritage;
 - ii) Identifying and conserving significant historic resources; **and**
 - iii) Promoting and fostering the County's diverse cultures by marketing local assets to the general population; **and**
 - iv) **Following provincial guidelines related to the *Historical Resources Act* for all development.**
- g) Continue to provide residents with library services through participation in the regional library system, development of satellite libraries and partnerships with neighbouring municipalities through cost sharing agreements.

SECTION 4: IMPLEMENTATION AND MONITORING

The MDP will be monitored and regularly reviewed based on a series of performance measures to ensure that development is being effectively guided. Implementation and monitoring of the MDP will occur through a number of mechanisms and processes, including:

- Ongoing administration of the development review process and periodically reviewing and amending area structure plans and conceptual schemes;
- Carrying out next steps required to implement the vision, guiding principles, and objectives of the MDP; and
- Collaborating with neighbouring municipalities on planning and development matters, as well as activities related to major processes and plans.

The MDP may be amended or updated to reflect changing circumstances and to ensure it remains an effective tool for achieving the goals and objectives of Council and aspirations of the County. The following section outlines how the MDP's policies will be effectively implemented.

4.1 Intergovernmental Relationships

Rocky View County shares boundaries with several municipalities, First Nations, and other partner groups. The County values its neighbours and is committed to building positive relations that create opportunities for collaboration, ensure effective communication, result in mutually beneficial solutions to growth and development, and provide opportunities for partnering in the delivery of services.

Objectives

The policies within the Intergovernmental Relationships Policy Area are to ensure the following objectives:

- Relationships with neighbouring municipalities and First Nations are positive and open.

- Administration and Council actively work to build and strengthen relationships with the Provincial government and agencies.
- The County and adjacent municipal councils and administrations communicate effectively.
- The range of facilities and services available to residents through partnerships with adjacent neighbours and other levels of government is expanded.

4.1.1 Administrative Coordination

- a) County administration shall communicate and co-ordinate on a regular basis with adjacent administrations to recognize and address matters of mutual interest.
- b) In order to foster and strengthen relationships with neighbouring municipalities and First Nations, Council will participate in Intermunicipal Committee meetings and Council-to-Council meetings when required.

4.1.2 Intermunicipal Development Plans Planning

- a) Where appropriate, intermunicipal development plans shall be prepared and adopted in collaboration with an adjacent municipality to enhance co-operative working relationships and to address issues of mutual interest.
- b) Intermunicipal development plans shall be prepared in accordance with the Municipal Government Act.
- c) An adopted intermunicipal development plan shall provide guidance for referral requirements and communication, with regard to matters within the plan area.
- d) The County will continue to communicate and consult with First Nations neighbours on mutual planning matters.

- e) When preparing new or amended existing intermunicipal development plans, consideration should be made to reflect the goals and policies of the MDP.

4.1.3 Annexation

- a) The County shall consider the negotiation of annexation areas with adjacent municipalities in accordance with the Municipal Government Act or adopted intermunicipal development plan.
- b) Annexation negotiations should take into consideration detailed growth studies that include such matters as: analysis of population trends and projections, land absorption rates, community development, infrastructure analysis, and financial considerations.
- c) The County shall use the growth policies of the MDP, adopted intermunicipal development plans, other *statutory plans*, and growth strategies as the basis for determining county needs and interests with regard to annexation negotiations.

4.2 Implementing the MDP

Several actions are necessary to effectively implement the MDP, guarantee its ongoing success, and fulfill the Plan's vision and guiding principles. The following policies and *Table 02* outlines these actions.

- a) County administration will report to Council on implementation of the MDP and the performance indicators on an annual basis.
- b) Administration will develop performance measures as needed to monitor the implementation of the MDP.
- c) Changes and additions to the implementation program and performance measures shall occur as required and directed by Council and are not to be considered as amendments to the MDP.
- d) A comprehensive review of the MDP shall be undertaken every five years in order to consider administrative updates, emerging trends, implementation progress, and policy gaps.
- e) At the discretion of Council, the County shall permit developer-funded area structure plans and conceptual schemes that incorporate public and stakeholder engagement and require Administration and Council approval.
- f) The County ~~will~~ should monitor and report to Council annually on the rate of development within area structure plans and conceptual plans, including the number of new dwellings, and dwelling types.
- g) When creating or amending area structure plans and area redevelopment plans, the County shall include a ~~condition~~ policy requiring municipal review of the plans after 10 years, and a review after 5 years if sufficient development has not been undertaken after 5 years of the plan's approval.

Table 02: Implementation Actions

POLICY AREA	ACTION
2.3 Residential Development	Update existing area structure plans and conceptual schemes to align with the MDP. Develop or expand area structure plans or conceptual schemes for Primary Residential Areas not currently covered by these plans.
2.4 Commercial and Industrial Development	Complete or amend area structure plans for Employment Areas not covered by existing plans.
2.5 Hamlet Development	Complete area structure plans, area redevelopment plans, or conceptual schemes (as appropriate) for Hamlet Growth Areas. Develop hamlet main street commercial guidelines
3.1 Financial Sustainability	Develop an economic development program to link investors and developers to investment opportunities
3.1 Financial Sustainability	Develop a fiscal impact model for assessing development impact to County finances
3.2 Transportation	Review and update the County's Transportation Model Develop a County-wide regional pathway and trail plan
3.5 Solid Waste	Invest in recycling and composting facilities
3.6 Public Space	Identify and acquire additional land for parks, open space and wildlife corridors, pathways, trails, and recreational and cultural amenities
3.7 Services and Partnerships	Identify County core services Prepare a Master Fire Plan

4.3 Reviewing and Monitoring the MDP

Implementing the MDP will require commitment to developing plans, strategies, and regulations that are consistently monitored to ensure they are effective as well as fiscally responsible. Council and County Administration will play a key role in implementing the Plan by setting priorities, providing work direction, and approving actions. The following performance measures will be used to track the effectiveness of the MDP annually.

Table 03: Performance Measures

GUIDING PRINCIPLE	TOPIC AREA	PERFORMANCE MEASURE	TARGET
Responsible Growth	Population Growth	Population	90% of new residential units are located in Growth Concept growth areas
		People per hectare in new developments	As identified in ASPs and Conceptual Schemes
	Land Use	Remaining residential development capacity (number of units) as a percent of total development potential in existing ASPs and Conceptual Schemes	Continued decrease
		Ha of available/vacant commercial/industrial land (overall, and by ASPs and Conceptual Schemes)	Stable 10 year supply based on projected demand
The Environment	Conservation	Residential diversity index	As identified in ASPs and Conceptual Schemes
		Ha of natural areas and environmental reserves (including conservation easements)	Increase
		Ha of protected wetlands	Increase

GUIDING PRINCIPLE	TOPIC AREA	PERFORMANCE MEASURE	TARGET
The Environment	Water Quality	Percent of impervious surfaces within development areas	20% or Less
	Water Quality	Percent of development and subdivision permits that include low-impact development features	100%
Agriculture	Agriculture Lands	Ha of agriculture lands converted to non-agriculture development	Decrease
Partnerships	Intergovernmental	Number of intermunicipal agreements	Increase
		Number of agreements with the Province.	Increase
	Agriculture	Number of formal partners Agriculture Services maintains.	Increase
	Recreation	Number of facility operations cost sharing agreements	Increase
Number of operational and capital grants to non-profits		Increase	
Economic Diversification	Employment	Population/jobs ratio	1:1
	Financial Sustainability	Tax assessment base diversification	65% residential and 35% business County-wide
Community Development	Recreation Amenities	Ha of neighbourhood, community and regional parks	Increase
		Annual number of unique users for directly provided registered programs as a percent of population	Increase
		Km of trails and pathways	Increase

APPENDIX A: GLOSSARY

Glossary

Agricultural Area: Areas of Rocky View County where redesignation, subdivision, and lot development are not guided by an area structure plan, conceptual scheme, or master site development plan.

Agriculture Services: Assist agricultural operators in the production of primary and value-added agriculture products and services.

Area Structure Plan: An area structure plan (ASP) is a statutory document approved by Council and adopted by Bylaw. The purpose of an ASP is to outline the vision for a development area, and provides a framework that describes:

- The proposed land uses
- Density of population
- Sequence of development
- General location of major roadways
- **Public utilities in the area**
- Any additional requirements that Council may require

Assessment Split Ratio: The ratio of Residential Assessment to Non-Residential Assessment in the County. This ratio is expressed in percentage of the overall taxable Assessment Base.

Business Areas: Regional business centres, highway business areas, hamlet business areas, or other business areas identified in an area structure plan or conceptual scheme.

Carrying Capacity: The ability of a watershed, air shed, and/or landscape to sustain activities and development before it shows unacceptable signs of stress or degradation.

Compact Residential Development: Development that sensitively integrates housing with the natural features and topography of a site by grouping homes

on smaller lots, while permanently preserving a significant amount of buildable land for conservation, recreation, or agricultural uses.

Conceptual Schemes: Plans that are subordinate to an area structure plan that may be adopted either by bylaw or by a resolution of Council. A conceptual scheme is prepared for a smaller area within an area structure plan boundary and must conform to the policies of the area structure plan. Conceptual schemes provide detailed land use direction, subdivision design, and development guidance to Council, Administration, and the public.

If a conceptual scheme area is of sufficient size that further detail is required for specific areas and phases, the conceptual scheme may identify smaller sub-areas and provide detailed guidance at that level. These smaller sub-areas are referred to as 'development cells'.

Confined Feeding Operation: Fenced or enclosed land or buildings where livestock are confined for the purpose of growing, sustaining, finishing, or breeding by means other than grazing and any other building or structure directly related to that purpose but does not include residences, livestock seasonal feeding and bedding sites, equestrian stables, auction markets, race tracks, or exhibition grounds.

Conservation Design: A method of site planning that begins with the identification of a land area's features and values that are to be retained and protected. These features may include natural habitat, wildlife corridors, open land, vistas, farm/ranch land, and historical areas. Once these areas are identified for protection, sustainable site planning may occur on the remaining lands.

County Policy: Policy that is adopted by resolution of Council.

County Servicing Standards: The County's technical requirements that govern infrastructure design, construction, testing, inspection, maintenance, and transfer of public works.

Country Residential Development: Residential communities in the County that typically include the following characteristics: primarily dispersed low-density residential development, parcel sizes of 1 acre or larger, rural character, designed with the landscape, and contain passive and active recreational, and cultural opportunities.

Developable Land: All land on which building could occur, excluding land identified as conservation or environmental reserve or reserve easement.

Ecological Features: Potentially important ecological features including wetlands, riparian areas, valuable agricultural soils, and wildlife corridors.

Employment Areas: These areas primarily contain commercial and industrial land uses and serve as major areas of employment in the County.

Exurban Development: Low density, dispersed development that has an economic and commuting connection to a larger metropolitan area.

First Parcel Out: The subdivision of a single residential or agricultural parcel created from a previously un-subdivided quarter section.

Fragmented Residential Area: Separated and dispersed pockets of country residential lots.

Fragmented Quarter Section: A quarter section of land within an agriculture area divided into six or more residential lots, and/or small agricultural parcels, ~~each of which is less than 10 hectares (24.7 acres) in size.~~

Hard Infrastructure: Land and infrastructure related to roads, pathways and trails, water and wastewater, stormwater, and parking and loading facilities.

Impervious Surface: Land surfaces that repel rainwater and do not permit it to infiltrate, or soak into the ground. Impervious surfaces can include paved driveways and parking lots, rooftops, and sidewalks.

Low-Impact Development: Development that uses a variety of techniques to treat and manage stormwater runoff close to the areas where rain falls. Low-Impact Development focuses on site design and stormwater control options such as green roofs, stormwater capture and re-use, and landscaping that increases the absorption and filtering of rainwater.

Minimum Distance of Separation: The provincially regulated setback established between a confined feeding operation and the neighbouring residence that is in existence at the time the application is submitted, and is intended to minimize the impacts of odour. Minimum distance of separation is measured from the outside walls of neighbouring residences to the point closest to the confined feeding operation's manure storage facilities or manure collection areas.

Natural Landscapes: Uninterrupted and undisturbed landscapes that have not been impacted by human development.

Non-Statutory Plans: The plans, strategies, and documents that guide and influence Rocky View County's planning and development, and are not regulated by the Municipal Government Act.

Notification Zone: An area within 1.6 kilometres of an adjacent jurisdictional boundary. The notification zone exists for the purpose of informing an adjacent municipality of a development application within the County.

Open Land: Developable land, including: parks and open space; publicly or privately owned land permanently used for conservation, recreation, agriculture, and/or institution uses; public utility lots; municipal reserve land dedication; riparian areas, constructed wetlands, stormwater treatment areas, wastewater treatment areas; flood fringe areas; and other environmentally important land not qualifying as environmental reserve.

Renewable Energy: Energy from a source that is not depleted when used, such as geothermal, solar, water, or wind energy.

Soft Infrastructure: Includes, but is not limited to, infrastructure relating to recreation, libraries, protective services, fire protection services, and schools.

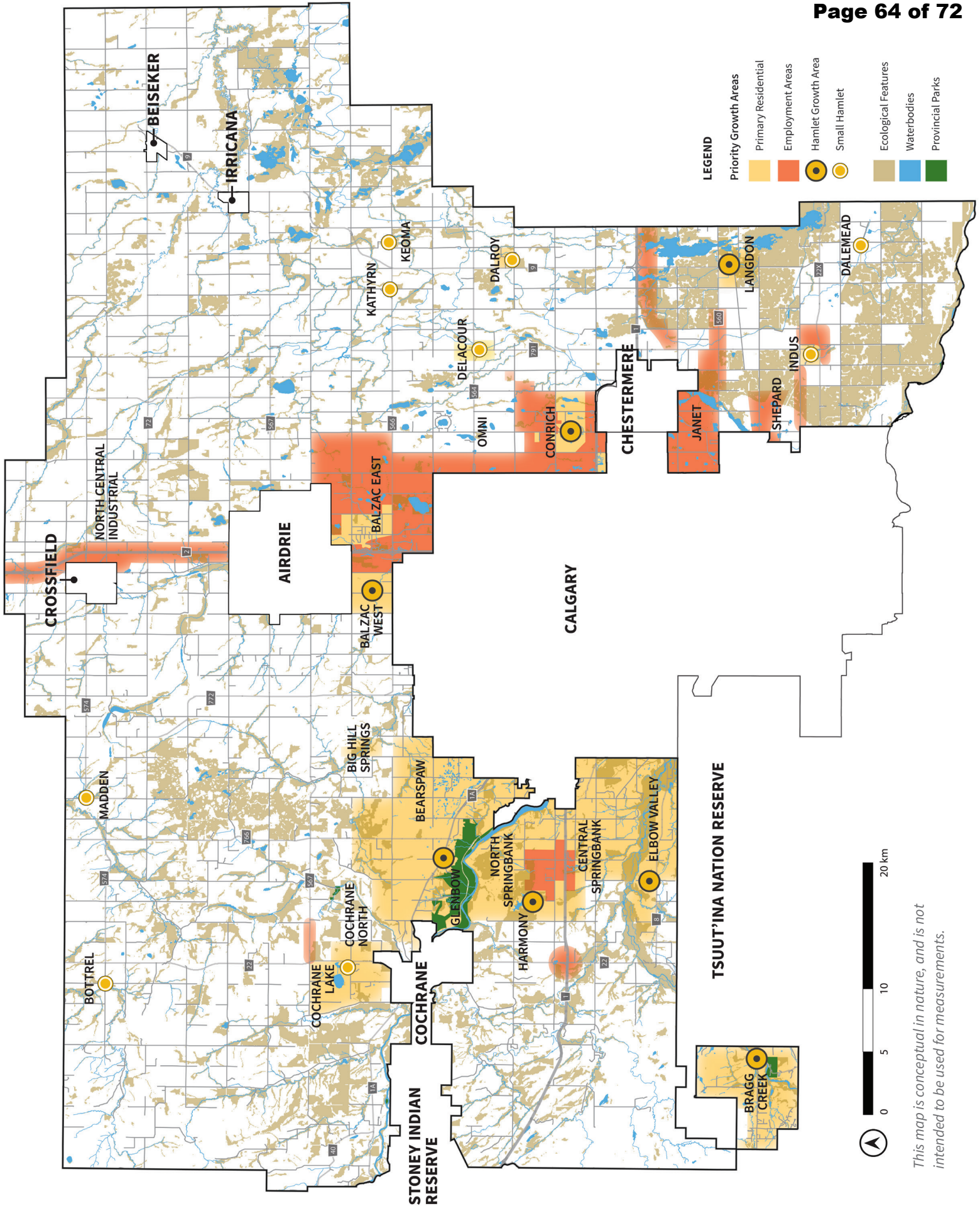
Statutory Plan: An intermunicipal development plan, a municipal development plan, an area structure plan and an area redevelopment plan adopted by a municipality under Division 4 of the Municipal Government Act.

Sustainable Development: Development that meets the needs of Rocky View today without compromising the ability for future generations to enjoy the same natural landscapes, quality of life, and diversity of residential and economic opportunities.

Un-Subdivided Quarter Section: A titled area of: approximately 64.7 hectares (160 acres) ; or a gore strip greater than 32.38 hectares (80 acres) in size, that has not been subdivided, excluding subdivisions for boundary adjustments, road widening, and public uses such as a school site, community hall, and rights of way of roads, railroads, and canals.

Value-Added Agriculture: The processing of primary agricultural products and services into secondary products to increase overall product value.

APPENDIX B: GROWTH CONCEPT MAP



This map is conceptual in nature, and is not intended to be used for measurements.

APPENDIX C: CONCEPTUAL SCHEME REQUIREMENTS

Conceptual Scheme Requirements

Conceptual scheme plans should address the following items:

Table 04: Conceptual Scheme Requirements

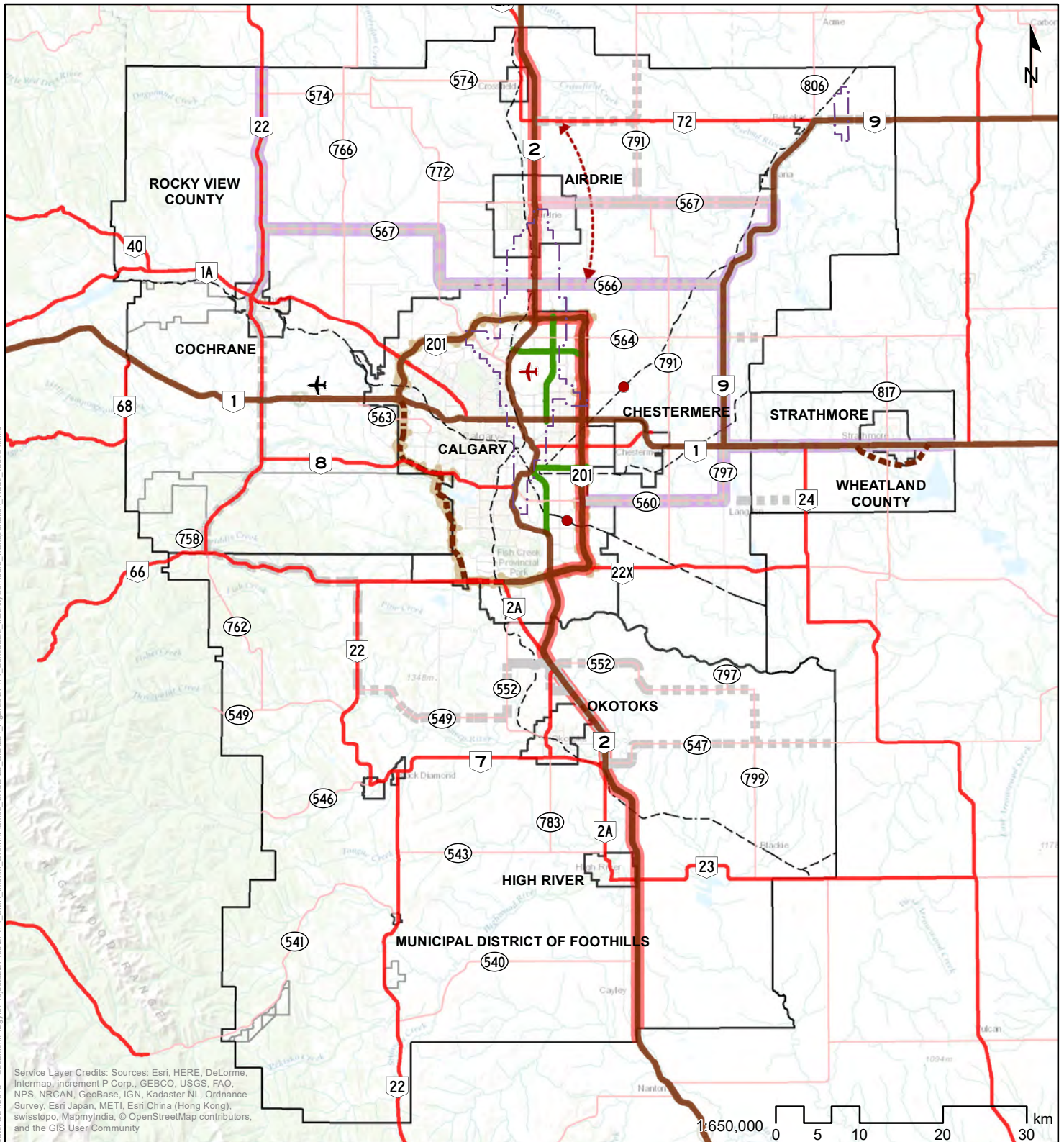
ITEM	
1	A description and evaluation of the local plan area including: <ol style="list-style-type: none"> a. Topography, soils, vegetation, geotechnical considerations; b. Environmental sensitivity and significance; c. Agricultural capability, natural resources; d. Existing land use, ownership, development, and adjacent land uses; e. Archaeological and historical considerations; and f. Existing utilities and transportation routes.
2	A land use concept including <ol style="list-style-type: none"> a. A vision for the proposal; b. Lot design and configuration; c. Lot sizes; and d. Phasing of the development.
3	A rationale for determining the boundary of the proposed conceptual scheme area.
4	Proposed design and architectural controls
5	Proposed residential densities, including calculations of gross and net densities and minimum, average and maximum lot sizes.
6	An assessment of how the application facilitates active transportation connections and details of any active transportation connections proposed within the conceptual scheme area.
7	Water and waste water servicing strategies, supported by applicable technical information required by the County. Such strategies should also include identification of any required rights-of-way to connect to regional or decentralized networks.
8	Proposals for municipal reserve dedication, where reserves are outstanding.
9	A summary of all community engagement and feedback received prior to submission of the local plan application, together with a description of how feedback has been incorporated into the local plan.
10	Mitigation to minimize impacts on surrounding land uses through appropriate spatial transition and interface measures.

ITEM

-
- 11** Proposals for design criteria that reflect Rocky View's unique character and rural setting, including:
- a. Building placement and setbacks;
 - b. Building mass, height, and architectural appearance;
 - c. Location and screening of parking stalls and outside storage;
 - d. Use of appropriate landscaping and screening measures to soften the appearance of a site;
 - e. The design of lighting installations to minimize sky glow, light trespass and impacts on wildlife;
 - f. Ensuring sensitivity to the development form and appearance of adjacent land uses;
 - g. Promoting a consistent development form and theme within the local plan area;
 - h. Maintenance of sight lines and open space, particularly for development adjacent to Highway 1;
 - i. Measures to ensure the unobstructed movement of wildlife across the local plan area; and
 - j. Building design that promotes energy conservation and efficient use of land.
-
- 12** A storm water strategy supported by applicable technical information required by the County.
-
- 13** A road plan and design strategy that:
- a. Promotes efficient and safe access and internal road circulation.
 - b. Highlights how the development promotes connectivity with adjoining lands.
 - c. Is supported by applicable technical information required by the County including, where necessary, a Traffic Impact Assessment.
-
- 14** An environmental strategy noting all environmentally sensitive areas and flood hazard areas within and adjacent to the local plan area and measures for avoiding or mitigating impact on these areas. The strategy shall be supported by applicable technical information required by the County.
-
- 15** A description of how the proposal will address potential impacts upon agricultural operations, together with any impacts of agricultural operations on the development itself.
-
- 16** A solid waste management plan that:
- a. Addresses the responsibility for, and level of service of, solid waste management through all stages of development, including occupancy;
 - b. Provides for innovative solid waste management practices that encourage, promote, and maximize landfill diversion and minimize waste material hauling;
 - c. Includes the infrastructure required to support solid waste and recycling management in public spaces;
 - d. Identifies the appropriate waste transfer stations / sites and recycling depots that serve the local plan area;
 - e. Conforms to the policies of the County's Solid Waste Master Plan; and
 - f. Sets a solid waste diversion target for the construction stage and for the occupancy stage.
-
- 17** All applicable technical assessments and reports required to support the development proposal as specified by municipal policies, plans and standards.
-

APPENDIX D: REGIONAL CORRIDOR MAPS

Schedule 3: Mobility Corridors – Transportation and Trade



Date: 09/24/2018 Document: Vgzyf\Projects\20210002174_CMR_Interim_GrowthPlan02_CADD\05_GIS\251_Figures\27174_Schedule3_MobilityCorridors_Transportation_Trade_180924.mxd

Service Layer Credits: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

- Intermodal Facility
- ✈ International Airport
- ✈ Springbank Airport
- ⬮ Airport Vicinity Protection Area
- ▬ Transportation Utility Corridor

- Transportation**
- ⋯ Rail
 - ▬ Level 1 Highway
 - ▬ Level 2 Highway
 - ▬ Level 3 Highway
 - ▬ Future Level 1 Highway
 - ↔ Conceptual Bypass

- Trade Corridors**
- ▬ CANAMEX
 - ▬ Existing High Load †
 - ▬ Proposed High Load †
 - ▬ Proposed Oversize/Overweight † *
 - ▬ Goods Movement

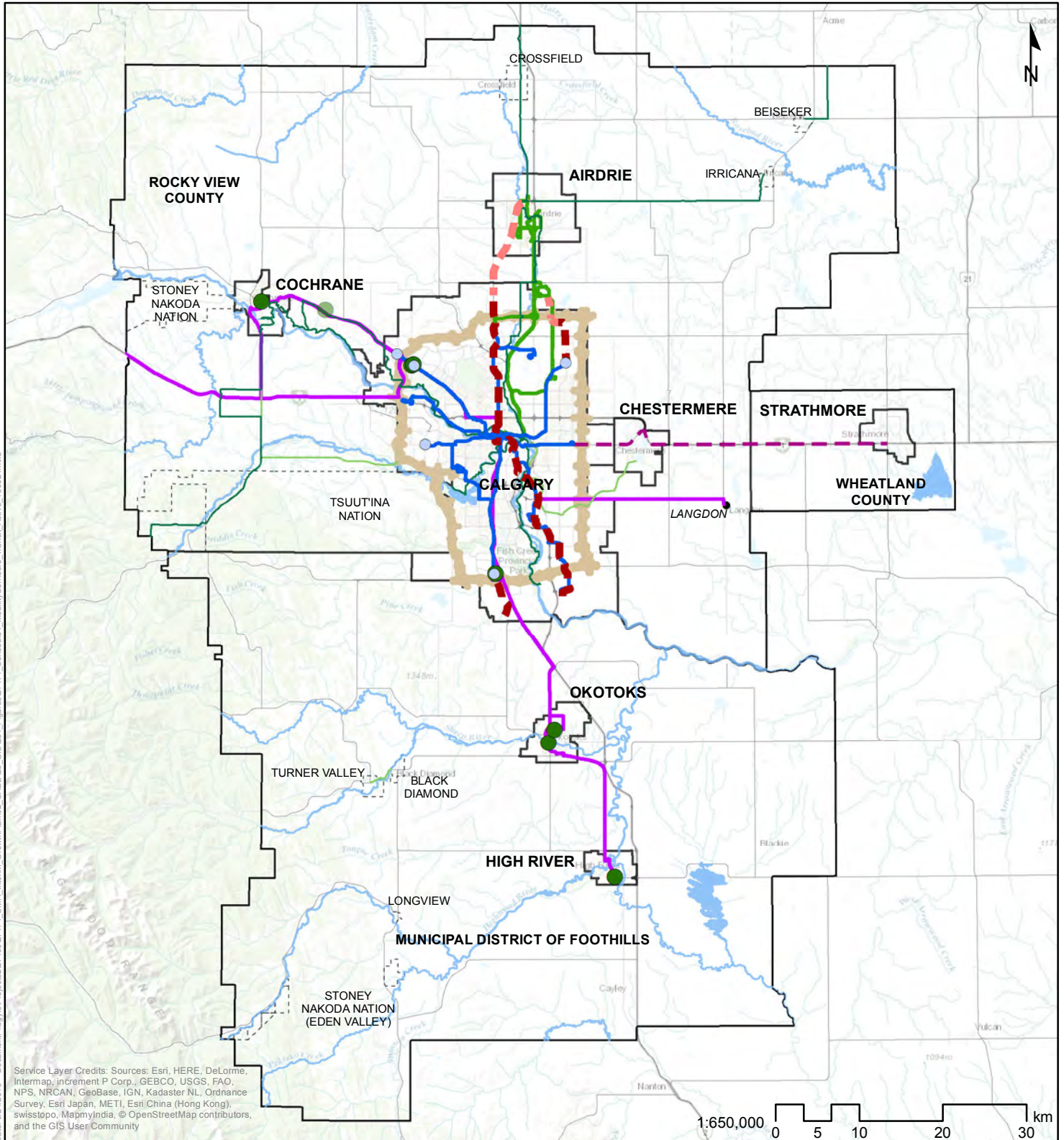
Calgary Metropolitan Region Interim Growth Plan



Current as of Sep-24/18

† Per AT's 2015 High Load Corridor on Provincial Highways map. † Per AT's 2018 High Load Corridor and Proposed Oversize / Overweight Corridor on Provincial Highways map.
 * Foothills County indicates it has not yet accepted or agreed to AT's proposal to use its 274 and 306 Avenues, and Highway 552 east of Highway 2 as Oversize/Overweight Corridors.

Schedule 4: Mobility Corridors – Transit and Active Transportation



Date: 02/24/2018 Document: V:\gis\Projects\2017\174_CMR_Interim_GrowthPlan\02_CADD\05_GIS\251_Figures\27174_Schedule4_MobilityCorridors_Transit_Active_180924.mxd

Service Layer Credits: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

- Park and Ride
- Future Park and Ride
- LRT Terminus Station/ Intermunicipal Connection
- Transportation Utility Corridor
- Active Transportation Corridors**
- The Great Trail †
- Regional Pathway
- Higher Order Transit (HOT) Corridors**
- Existing HOT ‡
- Planned HOT ‡
- Potential Future HOT ‡
- Intermunicipal Transit Corridors**
- Public Intermunicipal Transit
- Private Intermunicipal Transit
- Future Intermunicipal Transit

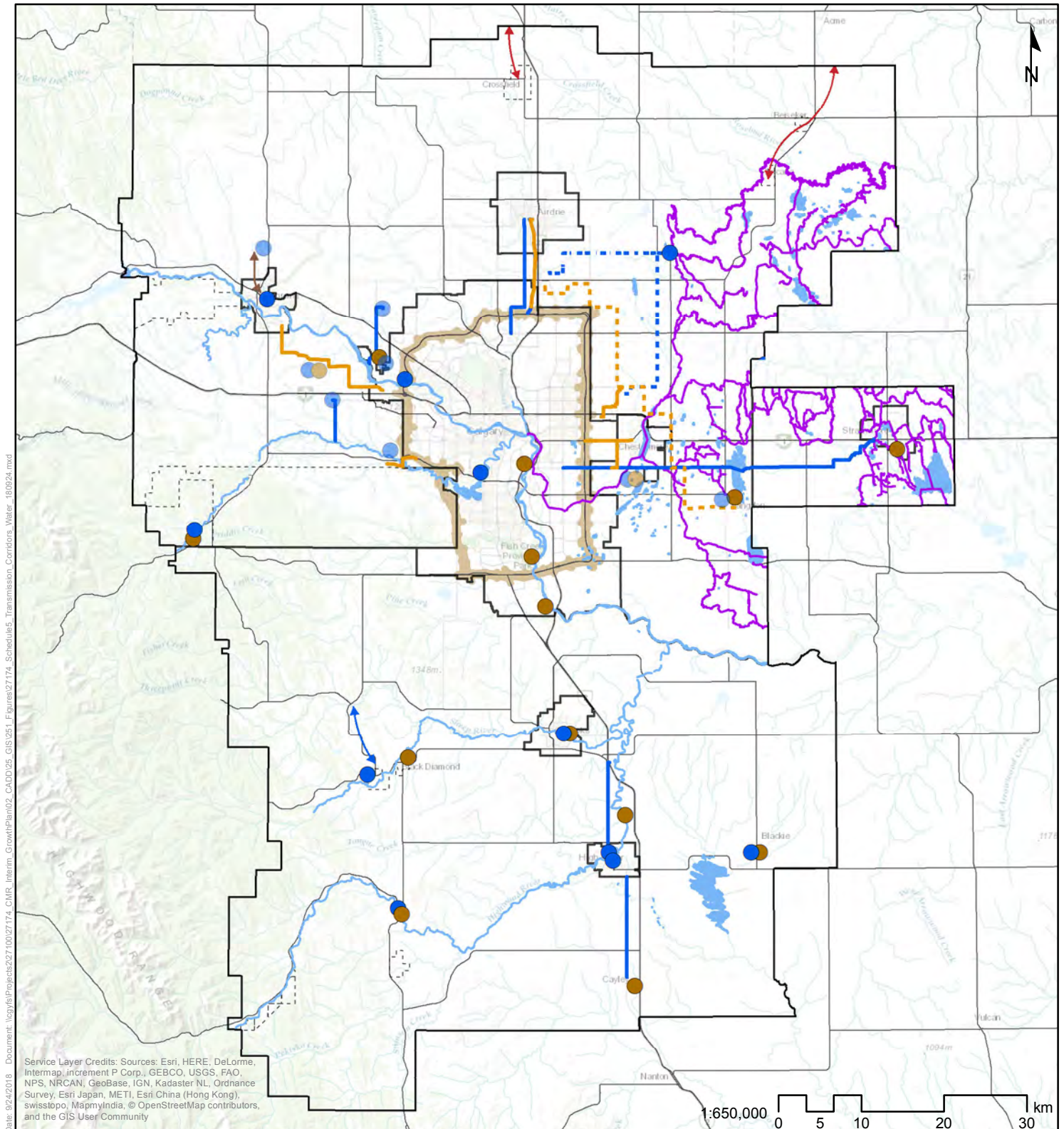
Calgary Metropolitan Region Interim Growth Plan



Current as of Sep-24/18

† Formerly the Trans Canada Trail. ‡ Higher order transit (HOT) includes light rail transit (LRT) and bus rapid transit (BRT).

Schedule 5: Transmission Corridors – Water



Date: 09/24/2018 Document: V:\gis\Projects\2017\174_CMR_Interim_GrowthPlan\02_CADD\05_GIS\251_Figures\27174_Schedule5_Transmission_Corridors_Water_180924.mxd

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- | | | |
|---------------------------------|-------------------------|-------------------------------------|
| Transportation Utility Corridor | Water Corridors | Intermunicipal Wastewater ‡ |
| Treatment Plants | Intermunicipal Water | Potential Intermunicipal Wastewater |
| Public Water | Millarville Water | Cochrane Lake Wastewater ‡ |
| Public Wastewater | Water Commission Line † | Western Irrigation District System |
| Private Water | | |
| Private Wastewater | | |

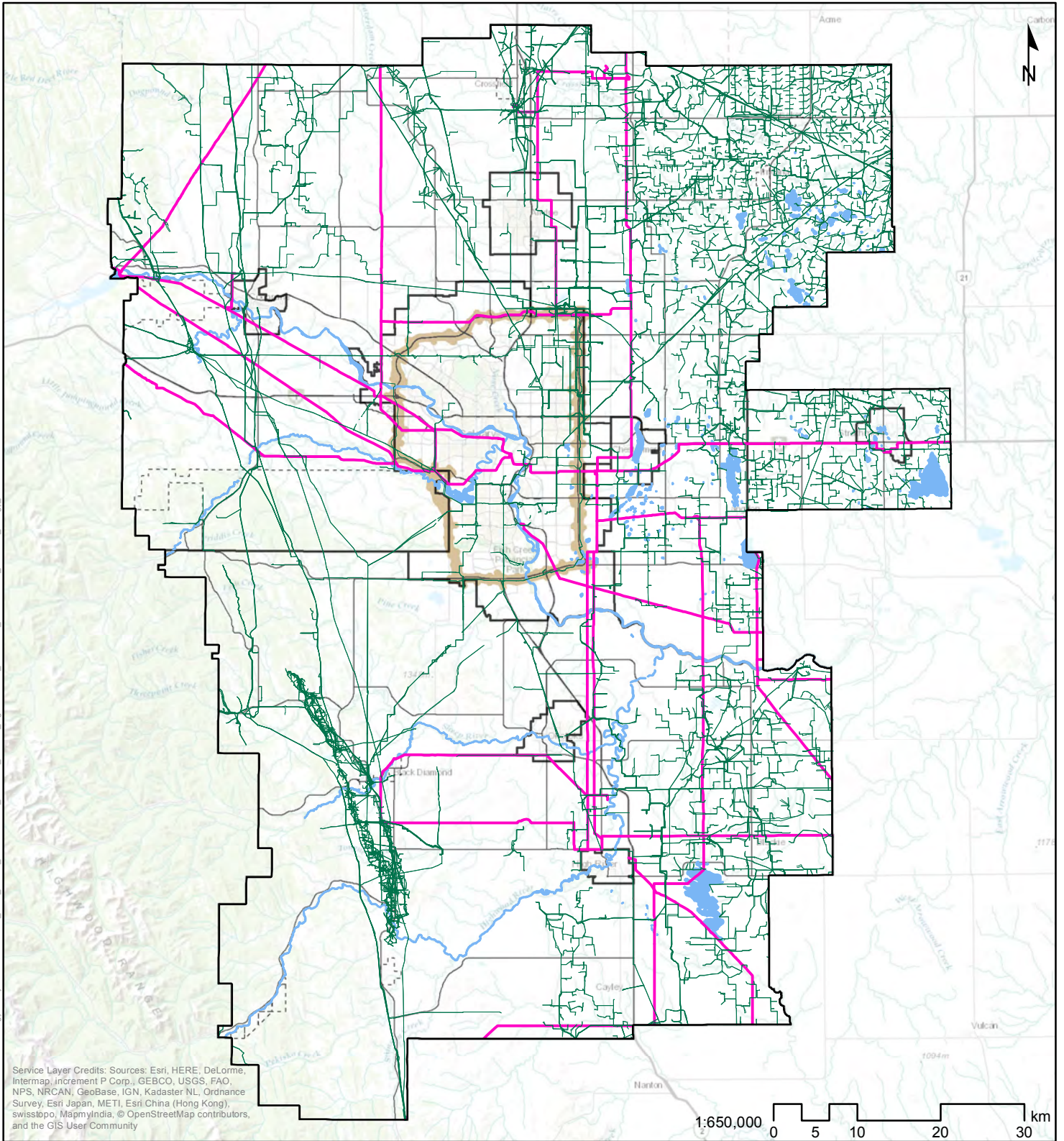
Calgary Metropolitan Region Interim Growth Plan



Current as of Sep-24/18




† Water commission lines are conceptual until accurate alignments received from the commissions. ‡ Alignment of wastewater line servicing Cochrane Lake is conceptual.

Schedule 6: Transmission Corridors – Energy



Date: 09/24/2018 Document: \cgy\gis\Projects\27100\27174_CMR_Interim_GrowthPlan02_CADD\05_GIS\051_Figures\27174_Schedule6_Transmission_Corridors_Energy_180924.mxd

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-  Transportation Utility Corridor
- Energy Corridors**
-  Power Transmission Line
-  Pipeline

**Calgary Metropolitan Region
Interim Growth Plan**



Current as of Sep-24/18

† Water commission lines are conceptual until accurate alignments received from the commissions. ‡ Alignment of wastewater line servicing Cochrane Lake not yet confirmed.



February 11, 2021

Dominic Kazmierczak
 Manager| Planning Policy
 262075 Rocky View Point
 Rocky View County, AB T4A 0X2
 Phone: 403.230.1401

<p>Stoney Consultation Office Box 120 Morley, Alberta T0L 1N0 Office: (403) 881 – 4276 Fax: (403) 881 – 4250</p>

Via email: dkazmierczak@rockyview.ca

**Re: Letter of Acknowledgment - Consultation with Stoney Nakoda First Nations (SNFN) –
 Rockyview County Municipal Development Plan - SCT 061-1097 (2021).**

Dear Dominic,

Thank you for your recent correspondence providing information about the above cited project.

Attached is a copy of the Stoney Information Letter (SIL) for you to review, and an SIL Form for you to complete for this project. The SIL contains important information about the Stoney Consultation Process, and is an important first step. The SIL Form is also designed to provide project information to the Stoney Consultation Team in a clear and consistent manner. Note that not all questions on the SIL will be applicable to your project.

We have conducted an initial review of your proposed project and note that it does impact Stoney Treaty Rights and Traditional Uses in the proposed project area. As signatories to Treaty Number 7 in 1877, the Stoney Nakoda First Nations have aboriginal and treaty rights entitlement throughout the 50,000 square miles encompassing Treaty 7 territory, and beyond. The SNFN have historic trails, campsites, hunting areas, fishing waters, ceremonial & spiritual sites, trade routes, grave sites, and gathering areas throughout our historical territory. As such we do have site specific concerns, but cannot share the information without an agreement due to intellectual property and protocol concerns. We will require more time to evaluate your project, at which time will be placed in the queue and provided the project number: SCT 061-1097 (2021).

Thank you for your interest in working with the Stoney Nakoda Nations.

Sincerely,



William Snow
Stoney Consultation Manager

C.C: Dean Cherkas, Stoney Consultation Director
Cathy Arcega, Stoney Consultation Office, Project Analyst & Coordinator
Chris Goodstoney, Wesley Consultation Officer
Conal Labelle Chiniki Consultation Officer
Larry Daniels Jr, Bearspaw Consultation Officer



February 11, 2021

RE: Request for Comment on Draft Municipal Development Plan

Dear Dominic and Amy,

Thank you for the Intermunicipal Committee meeting (IMC) of February 4 to discuss the draft Municipal Development Plan (MDP) circulated by Rocky View County.

As stated before and during the IMC meeting, we respect the right and opportunity for Rocky View County to direct growth to strategic locations within its boundaries. We support the desire to encourage development to the region as a whole – and to specific, strategic locations within the County in particular through its Municipal Development Plan. To this end, the City of Airdrie has consistently supported the concepts of regional planning, regional servicing, and other means to achieve efficiencies, equities and successes as a region. We see substantial opportunities for our municipalities to achieve such objectives through intermunicipal collaboration.

Per the discussion at the IMC meeting, we appreciate the recognition from the County of the need to come together as municipalities to address such opportunities for shared service optimization as well as the potential the impacts and inequities associated with growth in the north end of the Calgary Region. The development proposed by the County in the MDP for East Balzac and West Balzac brings these potential impacts and opportunities into specific relief. As such, we appreciate the suggestions from the County at the IMC meeting to move forward with the following progressive steps to address the impacts and inequities associated with the proposed development:

- a) Policy language in the MDP to recognize the potential impacts and opportunities associated with growth in this corridor and work collaboratively to resolve them;
- b) A Memorandum of Understanding (MOU) for the development of an Intermunicipal Collaborative Framework (ICF);
- c) A signed ICF detailing the municipal service categories for potential sharing and optimization;
- d) Signed cost-sharing agreements for the servicing identified in the ICF; and,
- e) A Joint Council meeting schedule and approach to review impacts and opportunities in common growth corridors, as well as to retain and amend the particulars of the ICF, where required.

The City of Airdrie looks forward to supporting the proposed County Plan at a regional level with the formalization of all of these mechanisms, but not before. We appreciate the efforts put forward by the County to capture some of the essence of the discussion at the IMC meeting through proposed motions that would add the following policies to the proposed County Plan:

New Policy [4.1.2 (f)]

Prior to approval of local plan and land use applications adjacent to another municipality, the County should consider the use of appropriate mechanisms, such as joint studies and infrastructure cost sharing agreements, to address cross boundary impacts identified by the County.

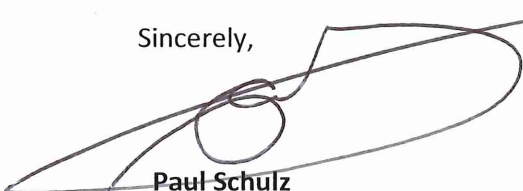
New policy [4.1.2 (h)]:

In preparing area structure plans and/or local plans, the County shall consider Intermunicipal Development Plans, Accords and any other statutory plans, which provide direction with respect to intermunicipal gateways, transition and interface; the County should address issues and opportunities through collaboration with the adjacent municipality.

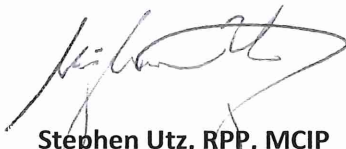
Unfortunately, these do not address all of the efficiency, equity and success objectives described in our earlier correspondence and our statement at the IMC meeting. In the interest of the County's objectives in this proposed MDP, the City of Airdrie will prepare draft language for consideration in the MDP on or before February 16, 2021. However, preparation of that language alone should not be construed as support for the plan in its current form in the absence of the progressive steps noted above.

We look forward to supporting the proposed County Plan on completing the work and collaboration for the steps identified during the IMC meeting and confirmed in this letter.

Sincerely,

**Paul Schulz**

Chief Administrative Officer
403.948.8800, ext. 8852
paul.schulz@airdrie.ca

**Stephen Utz, RPP, MCIP**

Community Growth Manager
403.948.8800, ext. 8471
stephen.utz@airdrie.ca

**Leona Esau**

Intergovernmental Liaison
403.948.8800, ext. 8769
leona.esau@airdrie.ca

CC: Mark Locking, Director of Community Growth and Protective Services
Jamal Ramjohn, Team Leader of Planning & Development

January 25, 2021

RE: Request for Comment on Draft Municipal Development Plan

Dear Dominic,

Thank you for the opportunity to comment on the draft Municipal Development Plan (MDP) circulated by Rocky View County as follow up on our letter of November 20, 2020.

We respect the right and opportunity for Rocky View County to direct growth to strategic locations within its boundaries. We do not object to the desire to encourage development to the region as a whole, and to specific, strategic locations within the County in particular through its Municipal Development Plan.

To this end, the City of Airdrie has consistently supported the concepts of regional planning, regional servicing, and other means to achieve efficiencies, equities and successes as a region. We see substantial opportunities for our municipalities to achieve such objectives through intermunicipal collaboration.

Our previous comments on *Section 3.1.1 – Financial Sustainability Policies* spoke directly to that opportunity. As stated on November 20, the proposed development expansion shown in the Land Use Concept for West Balzac and East Balzac is an area subject to further discussion and intermunicipal collaboration. These lands adjacent to our southern border are of critical importance to both of our municipalities and the north end of the Calgary Metropolitan Region as well. It has always been our intent to work with Rocky View as part of a Joint Planning Area (JPA) or under the terms of an Intermunicipal Collaborative Framework (ICF) for these critical updates. Such a mechanism would ensure that all opportunities for shared services and cost optimizations have been explored, and that we are proactively addressing all potential impacts on both municipalities.

We advise that we could support the proposed Municipal Development Plan contemplated by the County with the formalization of one of these mechanisms. This would likely take the form of an adopted Context Plan and associated agreements in the case of a JPA, or through a Memorandum of Understanding of mutually acceptable terms in the case of an ICF.

It is my understanding that our collective Administrations are working together to schedule an Intermunicipal Committee (IMC) meeting to have purposeful dialogue on such mechanisms. We look forward to the discussion on achieving the mutually beneficial opportunities and mitigating the potential impacts from this scale of growth in the north end of the region.

Beyond this, we note the following with respect to some of our other comments from November 20:

- We appreciate that the County has agreed to a language change in Section 3.4.3 – Confined Feeding Operations to mandate that a confined feeding operation not be located within the notification zone with any adjacent municipality.



- However, in keeping with our earlier comments and the position of this letter, we support language that directs growth to specific, strategic locations. While we appreciate the desire for flexibility, the intent of planning is to direct growth to efficient and appropriate locations. We request that the language we cited on November 20 regarding your Principles, Employment Areas and Hamlet Growth Areas align with that intent. Further, we note that the purpose of the Regional Growth Plan is to direct growth to strategic locations and that this MDP has not referenced this direction in a substantive manner.

We look forward to the opportunity for discussion on this matter at an IMC meeting at the earliest possible convenience.

Sincerely,



Stephen Utz, RPP, MCIP

Community Growth Manager, City of Airdrie
403.948.8800, ext. 8471
stephen.utz@airdrie.ca

CC: Paul Schulz, City Manager
Mark Locking, Director of Community Growth and Protective Services
Jamal Ramjohn, Team Leader of Planning & Development
Leona Esau, Intergovernmental Liaison



November 20, 2020

Re: Response to Intermunicipal Circulation of draft MDP

Dear Dominic:

The City of Airdrie Planning & Development Department has completed its review of Rocky View County's Municipal Development Plan (MDP). Thank you for the opportunity to provide input in your engagement process.

The following list comprises areas of the draft MDP for which we have suggested amendments:

Section 1.3: understanding that flexibility is desired here, it would be preferable to write, "Rocky View County shall concentrate growth within designated development areas...."

Section 2.4.1: the proposed wording (subsection 'a') here notes employment areas in Figure 2 should have an adopted area structure plan in place prior to development. Replacing the word "should" with "shall" would be preferred. Similarly, in subsection 'c', "expansion of Employment Area boundaries should require an area structure plan or an area structure plan amendment", it is preferred that "should" be replaced with "shall".

Section 2.5.1: growth in Hamlets (subsection 'a') notes, "Development in Hamlet Growth Areas should be guided by, and conform to, the adopted area structure plan, area redevelopment plan, or conceptual scheme." Replacing 'should' with 'shall' here is preferred.

Maps 2 & 3 and Section 3.1.1: the Assessment split proposed in this section and extent of proposed future employment areas adjacent (south and southeast) to Airdrie, are subjects for further discussion and Intermunicipal collaboration.

Section 3.4.3: in subsection 'b', the draft MDP notes, "A confined feeding operation, including its minimum distance of separation, should not be located within the boundary or notification zone of any Intermunicipal development plan, statutory planning area, hamlet, residential area, institutional use, or federal, provincial, or municipal park or recreation area." Replacing 'should' with 'shall' here is preferred.

If you have any questions or comments, please do not hesitate to contact me.

Kind regards,



Jamal Ramjohn RPP, MCIP
Team Leader, Planning & Development
jamal.ramjohn@airdrie.ca
403.948.8800 (ext. 8242)

February 3, 2021

Rocky View County Offices
262075 Rocky View Point
Rocky View County, AB, T4A 0X2

To: Ms. Theresa Cochran
Executive Director, Community Development Services, Rocky View County

Mr. Dominic Kazmierczak
Manager, Planning Policy, Rocky View County

Re: [Rocky View County's New Municipal Development Plan Project](#)
The City of Calgary's submission to Rocky View County's Public Hearing

Dear Ms. Cochrane and Mr. Kazmierczak:

This letter is intended to provide The City of Calgary's Administration position on Rocky View County's proposed Municipal Development Plan.

As detailed in The City of Calgary's letters of November 20, 2020 and January 20, 2020, The City of Calgary has the following five concerns with the proposed Municipal Development Plan:

1. Addressing impacts on Calgary infrastructure and services

The Calgary Metropolitan Region Board's Interim Growth Plan (Policy 3.2.3) states that *"All statutory plans shall: provide mitigation measures and policies to address identified adverse impacts on existing or planned regional infrastructure, regionally significant corridors, and community services and facilities."* The County's revision to the draft MDP has not sufficiently addressed potential detrimental impacts on Calgary's regionally significant infrastructure, corridors and services. **Additional policies are required to ensure that growth in Rocky View County has no adverse impacts on regional infrastructure, services and facilities within The City of Calgary.**

2. Identifying Priority Growth Areas

The proposed Municipal Development Plan does not identify priority growth areas or provide growth management policies for Rocky View County. As a result, The City of

Calgary is concerned that the absence of policy will result in an overall dispersed pattern of growth to occur that is not aligned with the purpose, principles and policies of the Interim Growth Plan to promote the efficient use of land. **Additional policies are required to ensure that the Municipal Development Plan supports the efficient use of land and services.**

3. Source Water Protection

The City continues to have significant concerns about several issues regarding source water protection. Further concerns are detailed in our letter dated January 20, 2021. In our view, the proposed Municipal Development Plan is not in alignment with the principles of the Interim Growth Plan, Intermunicipal Development Plan, the Bearspaw Reservoir Tri-Lateral Consensus report and the Glenbow Ranch mediated settlement agreement as there could be significant impact on The City and region's source water quality. **Additional policy is required to support the sustainability of our region's long-term drinking water supply.**

4. Calgary's IDP Growth Areas need protection

The proposed Municipal Development Plan identifies Rocky View County growth areas within long-standing identified City of Calgary Growth Areas (as identified in our jointly adopted Intermunicipal Development Plan). More specifically, the Municipal Development Plan would be in conflict with the Intermunicipal Development Plan as well as our long-standing agreements with respect to growth of both municipalities. **The Municipal Development Plan should be amended to remove Rocky View County growth areas from identified City of Calgary growth areas unless the Intermunicipal Development Plan is jointly amended.**

5. Ensuring sufficient collaboration undertaken by the County to resolve cross-boundary issues

The proposed Municipal Development Plan project has not meaningfully engaged The City of Calgary in the development of the Municipal Development Plan.

Given the outstanding concerns identified in this and previous letters (attached), The City of Calgary does not support the approval of the proposed Rocky View County Municipal Development Plan. We would ask that our municipalities work together to resolve these issues in a meaningful way. **Therefore, The City of Calgary would request that Rocky View County not give second reading to the Plan but rather direct Administration to work with The City of Calgary' Administration to resolve the above identified concerns.** The delay would enable our Administrations to continue to work together to resolve these outstanding issues in a meaningful, mutually beneficial manner.

Should Rocky View County Council give Second Reading to the Proposed Municipal Development Plan, The City of Calgary would request that (in alignment with our jointly

adopted Intermunicipal Development Plan) Rocky View County agree to enter into mediation to resolve the identified concerns.

Thank you,



Christine Arthurs, BA MEdes (Planning) RPP, MCIP
Acting General Manager
Deputy City Manager's Office
The City of Calgary

Attachments (2)

cc: Stuart Dagleish, General Manager, Planning & Development, The City of Calgary
Kelly Cote, Manager, Intergovernmental and Corporate Strategy, The City of Calgary



January 20, 2020

City File: RV20-15

Attention: Dominic Kazmierczak

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

SUBJECT: Rocky View County's Draft Municipal Development Plan (circulated December 18, 2020)

Dear Mr. Kazmierczak,

Thank you for your letter dated December 18, 2020 containing the County's response to our previous comments on The County's draft Municipal Development Plan (MDP). The City of Calgary (The City) Administration has reviewed the recirculated draft MPD in consideration of Rocky View County/City of Calgary Intermunicipal Development Plan ("IDP") and the Calgary Metropolitan Region Board Interim Growth Plan ("IGP").

As drafted, the MDP could enable potential detrimental impacts on Calgary infrastructure, regionally significant corridors, services, and source water. The draft MDP also proposes fragmenting Calgary's IDP Growth Areas and focusing development on our boundaries where two municipalities have not yet coordinated our planning. These issues and others have been identified in the previous circulation response letter, dated November 20, 2020, and have not been addressed sufficiently to mitigate potential adverse impacts. As this time, The City of Calgary is unable to support the Municipal Development Plan.

The City of Calgary requests that the MDP not be considered for approval until such time that the impacts to Calgary infrastructure and services associated with the draft plan are addressed and policy controls are in place to resolve cross-boundary impacts. Given the number of concerns, The City requests that further collaborative administrative meetings occur prior to second reading, and that The County and City utilize the provisions outlined within IDP section 15.3 *Resolution of Intermunicipal Matters*.

The City offers the following general comments for your consideration.

1. Addressing impacts on Calgary infrastructure and services

The IGP states in policy 3.2.3 that “All statutory plans shall: provide mitigation measures and policies to address identified adverse impacts on existing or planned regional infrastructure, regionally significant corridors, and community services and facilities.” The County’s revision to the draft MDP has not sufficiently addressed potential detrimental impacts on Calgary’s regionally significant infrastructure, corridors and services.

We understand that ASPs and other planning tools can be utilized to further understand impacts to infrastructure; however, the draft MDP needs to include policies in that specifically call for ASPs to explore cost-sharing for services and to identify all off-site infrastructure upgrades. Currently, the MDP supports potential cost-sharing agreements only for libraries in section 3.10.1.g). The City would be supportive of proportionate cost-sharing, and strongly recommends the draft MDP strengthen high-level policies to support subsequent work in ASPs.

2. Identified Priority Growth Areas

The City would appreciate further clarity on The County’s approach to setting overall growth locations and on how the County intends that the priority growth will be sequenced. There are very few policies tying growth to servicing, or understanding that the cumulative impacts of this growth could have detrimental impacts to The City of Calgary. Without prioritization or growth management policies, the draft MDP could enable an overall dispersed pattern of growth to occur that is not aligned with the purpose, principles and policies of the IGP to promote the *efficient use of land*. Where does the County anticipate development will occur next?

At this time, the County’s response does not sufficiently address the impacts to the region. We request further details on the amount of growth that could be achieved through the total of all land uses in the draft MDP.

3. Source Water Protection

Thank you for being amenable to further discussions. The City continues to have significant concerns about several issues regarding source water protection:

- 1) Development approach of the County and the general vagueness of “*adaptable growth areas*” which appears to go against the intent of sustainable regional planning.
- 2) Continued disconnect between piped servicing, development and reliance on individual lot solutions to address water, wastewater and storm servicing.
- 3) The lack of policy on source water protection
- 4) It is in The City’s opinion that without baseline surface water quality data / conditions RVC cannot address the cumulative impacts the proposed (and existing) development will have on source water.

In our view, the draft MDP is not in alignment with the principles of the Interim Growth Plan as there could be large impacts on regional infrastructure, source water quality, and promotes inefficient use of land.

4. Calgary's IDP Growth Areas need protecting

The draft MDP would enable premature development and fragmentation of Calgary's IDP Growth Areas, which is a significant barrier to Calgary's approach to creating comprehensively planned urban communities that can be sufficiently serviced after annexation. It is very difficult to integrate new urban development on previously-developed annexed lands. This is not a sustainable approach to regional planning.

The draft MDP would consume half of Calgary's Industrial Growth Area and perforate two portions of our Residential Growth Area. Having development predetermine what is in place for us can make the lands less viable for future annexation to Calgary and could affect our 2006 Annexation Agreement. Maintaining the integrity of future annexation lands is important to The City; we have not supported past applications in Calgary's IDP Growth Areas because they impact the ability to accommodate future urban development.

While not in direct conflict with the IDP policies on Growth Areas, the draft MDP is inconsistent with the spirit and intent of the IDP because it does not align with the objectives to *recognize growth corridors for both municipalities*. At present, our municipalities have not agreed on an appropriate use of these lands.

5. Ensuring sufficient collaboration undertaken by the County to resolve cross-boundary issues

IGP policy 3.2.3 states that "*Municipalities should collaborate to coordinate planning for land-use, infrastructure, and service provision with other members, where appropriate.*" The County's revision to the draft MDP has not yet provided us with a sufficient opportunity to collaborate to coordinate our planning as potential cross-boundary impacts. We recognize the County is arranging a follow up meeting to address our responses, and we look forward to collaborating further.

In responding to The City's concerns regarding insufficient collaboration, County Administration compares The County's process as similar to others in the region. For a plan proposing significant shifts in direction, The City would have welcomed a *structured engagement process* to support collaboration. The County's past engagement on the previous County Plan provided this and it is a good example of the level of engagement that would have been needed to address concerns of this magnitude. Instead, The City first learned of the County's proposed direction through a circulation of the draft plan because no meeting was held at the plan development stage for The City's input at a critical milestone.

Thank you for the opportunity to review and comment on this draft plan. Detailed technical comments are provided in the attachment. The City maintains that development within the County's draft MDP

should not have a negative financial, social and environmental impact on Calgary. We have many more constructive comments that we would like to share with your staff. We look forward to our meeting on this very important plan. We remain committed to achieving a mutually beneficial solution and request that the draft MDP not be given second reading so that County can resolve the significant issues arising from the draft plan.

If you have any questions or concerns, please contact myself or Neil Younger, Senior Strategist, Intergovernmental & Corporate Strategy at: neil.younger@calgary.ca or 403.828.1647.

Sincerely,

Natalia Zoldak

Planner 2, Intergovernmental & Corporate Strategy
Deputy City Manager's Office | The City of Calgary
C: 403.828.4516 | E: Natalia.Zoldak@calgary.ca

cc: Neil Younger, Senior Strategist, The City of Calgary
Kelly Cote, ICS Manager, The City of Calgary
Matthew Atkinson, The City of Calgary

Attachment: Detailed Technical Comments

Detailed Technical Comments

1. PLANNING AND DEVELOPMENT COMMENTS, INTERMUNICIPAL COMMENTS

There are several areas in the document that continue to present issues for our intermunicipal coordination. The City would like to see these addressed.

- a) Figure 1: **Planning Framework Alignment** – while IDPs are subject to the CMRB Growth Plan Framework, the diagram shows it outside.
- b) Calgary Growth Areas. Figure 2: **Growth Concept Map** identifies Priority Growth Areas on lands identified in the IDP as Calgary Growth Areas. This is inconsistent with the IDP. *This issue has not been addressed, rather, the MDP continues to not be in alignment with previously approved higher order policy. The City requests further meetings to discuss this matter. Additional details are in the letter.*
- c) Figure 2: Growth Concept Map Identifying Priority Areas for Growth proposes a significant amount of residential and employment lands without prioritizing those lands or providing an understanding of the amount of growth contained within those areas. The plan states a 20-year time horizon, The City is requesting the geodemographic information that informed this map and how it is tied to population projections. *Without this information, it is difficult to understand how the region is intending to grow. Also, the amount of growth proposed is an important factor for ASPs to consider as full servicing is often tied to larger build out. This information should be provided and considered at the ASP stages of planning. This would allow the ASPs to understand timing for build out and impacts to offsite services*
- d) The City requests data be provided on amount of **population and jobs** that can be accommodated in the Growth Concept. *To be able to plan the region effectively and prioritize growth areas, data needs to be provided to outline the number of jobs and population that could be accommodated within the plan area. The expansion of residential and employment uses should be tied to growth projections.*
- e) The City recommends that growth areas be prioritized and growth management through policy or mapping to ensure appropriate levels of servicing can be provided. *The County states that ASPs will assess technical feasibility and servicing availability. However, further policies need to be drafted to ensure that ASPs consider the cumulative effects of development to offsite services and infrastructure and that cost sharing for these impacts are mitigated.*

- f) The City recommends that additional plans and studies should inform the MDP, most significantly additional transportation studies and the Bearspaw Task Force Trilateral Consensus Report. *These studies should be added to the list outlined in the MDP.*
- g) Section 2.3.1.h.i Establish density ranges and dwelling unit numbers that determine population on the basis of developable land. *The City recommends adding servicing and infrastructure considerations to this policy.*
- h) The draft MDP is silent on a number of areas including equity, Indigenous relations, future of mobility, and livability. The City recommends Rocky View County consider addressing these policy areas within the MDP. *Comment was not responded to at all.*
- i) **Planned and Future growth areas map.** Figure 3 identifies unplanned lands beyond North Springbank ASP as “Planned Areas”. In addition, plans under review are also identified as “Planned Areas” (Springbank, Janet, etc) but without specific guidance on how existing plans will proceed. Will it permit large future intensification? How are plans in process guided? *Comment was not responded to at all.*
- j) *The County outlines that ASPs will assess infrastructure and servicing impacts to Calgary. However, there is no policy contained within the plan indicating this. The City requests that policies stating the future ASPs will examine, in collaboration with other impacted municipalities, the cumulative effects of the proposed development on offsite infrastructure and services. ASPs should outline cost sharing policies for these services and infrastructure. Planning proposals will need to consider how adverse impacts may be resolved, or what steps will be taken at the ASP stage.*
- k) The City remains concerned about the remainder of the OMNI lands being shown and ask that the County consider the mediated settlement in its planning efforts. The City is also concerned about growth surrounding Omni as this could increase the level of impacts as those raised in the settlement. The City is unable to support boundary development until sufficient provisions are in place to address our concerns.
- l) Thank you for adding text regarding air quality and GHG emissions to the draft MDP in Section 3.5 (Environment).

2. TRANSPORTATION COMMENTS

The impacts on transportation infrastructure are not sufficiently addressed. The draft MDP needs further policy guidance for ASPs:

- As previously communicated, the full build out of these plan areas will mean there is a significant need for new or expanded major infrastructure. A significant amount of development is proposed to be located along Calgary's boundary where they are expected to impact Calgary's transportation system. The City is concerned with the resulting traffic impacts. Appropriate provisions are needed to support highway networks, and identify and mitigate downstream impacts. The Interim Growth Plan policy 3.5.1.1 c) outlines that impacts to regionally significant infrastructure must be identified and mitigated through the plans; this has not occurred to date.
- The draft MPD focuses development on our boundary and will increase the demand on City of Calgary's transit infrastructure, while not contributing to its maintenance or construction. Cumulative impacts of this development needs to be understood. The City would like to see the draft MDP address the cumulative impacts of the proposed growth on City infrastructure and services.

3. CALGARY TRANSIT

There is a need for greater mention on the future provision of transit, and clarity regarding the addition of transit policies. The proposed growth in Rocky View at the City boundary may result in increasing pressuring Calgary services such as transit.

General Comments:

1. The response package indicates RVC "added policies related to future provision of transit service." In reviewing the redline document, it is unclear where these new policies are. Please clarify.
2. CT strongly recommends including a short transit section to set high-level policies for future transit provision, especially given the extent of growth proposed in the MDP. While local plans can include area-specific details, late stage transit planning at the local plan level is difficult and results in costly retrofitting, inefficient operations, and missed opportunities, especially near intermunicipal boundaries.
 - The content of a transit section in the MDP should include priority areas for transit corridors, transit hubs, and direction for local area planning (i.e. local plans with a regional transit component should provide direct paths of travel for the transit service, and avoid having transit connections on a major deviation or discontinuous road networks).
3. The growth pattern proposed is unclear in terms of priority and identifies multiple areas near the Calgary City boundary for future growth. Non-contiguous growth patterns do not support

transit service. Clarity needed on sequencing of priority growth areas and the impacts of growth on transportation systems to holistically evaluate the impact to the City of Calgary growth and servicing.

4. WATER RESOURCES

Comments previously provided by Water Resources on November 20, 2020 have generally gone unaddressed and appear to be completely unacknowledged in the response from Rocky View County. The initial comments provided by Water are appended to this section.

Water Resources provides the following specific comments on the letter received from RVC (Dominic Kazmierczak) dated November 20, 2020:

Pg. 2: Identified Priority Growth Areas: General comment . . . The City would appear to be reluctant to support such a shift to a more sustainable development form that would result in benefits for both municipalities and achieve regional goals.

- The City would suggest this is a misleading statement; there appears to be very little in the MDP that indicates how RVC will achieve sustainable development in the absence of a strong policy framework to inform lower order plans. The MDP should provide a policy structure that is coordinated through realistic and serviceable growth areas that outline how water resources and the environment are protected.

*Pg. 2: Identified Priority Growth Areas: The City would suggest that there isn't a difference in rural and urban planning and the problem has been the 'flexibility' that RVC has in the MDP which does not lead to sustainable planning, particularly under a new regional plan. The City would suggest that *adaptable growth areas* go against the spirit of sound and sustainable regional planning.*

Pg. 2: Identified Priority Growth Areas: The County considers that the most appropriate place for detailed and accurate planning of population growth and the services required to support that population is at the ASP and future local plan level.

- The City would suggest that this approach does not lead to identified growth areas or contiguous development pattern. This statement is problematic as it does not allow for the organized and coordinated extension of services while going against the spirit of sound sustainable regional planning.

Pg. 3: Source Water Protection: MDP should reference the Bearspaw Tri-Lateral Consensus report and Glenbow Ranch mediated settlement in which the County must accept responsibility and mitigate any harm or detriment to the drinking water supply for 1.2 million people and not defer responsibility to AEP or developers. As the planning authority, RVC has an environmental stewardship responsibility they cannot download.

- The paragraph also refers strategies that rely on provincially approved servicing systems. In the absence of source water protection policy, The City would request RVC supply a map showing all septic systems and drain fields upstream of Calgary within the source water. The City would also

request clarity on RVC's tracking system, emergency response plan, or strategy to address system failures over time. It is suggested this would be a worthwhile exercise for RVC to consider (if not already done) outside of the MDP process.

In several comments, RVC suggests that they agree of the importance of Source Water protection. This commitment is not reflective in the MDP vision or policy statement. The City would suggest that in the absence of a commitment to continuous piped servicing system expansion the policies around source water need to be strengthened to ensure the continued protection of the source watershed. The addition of these policies should be supported by science to clearly articulate how development is not negatively impacting source water.

Updated MDP draft:

General:

RVC states in their response that they have made amendments to the MDP to include specific source water protection policies. Upon review additional policy statements have not been added except for an acknowledgement of source water protection in the *ecological feature description*.

- The City is requesting that specific 'shall' policy statements be added to the MDP to illustrate RVC's commitment to source water protection.

RVC uses the term *environmental features* and *ecologically sensitive areas* in the MDP, language which remains vague and lacks details on what they would consider *potentially important*. Response indicates that this was kept intentionally high level since studies would occur at the ASP or other planning stage. The City does not support this approach and would suggest the intent of the MDP is to set the direction for lower order planning documents achieved through the support of strong policy statements.

- The vagueness of the draft MDP is a concern. The City would suggest that it does not provide enough direction to inform lower order plans or result in an organized and contiguous growth pattern.
- 1.6.6: *Additional Plans and Studies informing the MDP* – The City would suggest the addition of a water / environmental protection plan be developed to help inform the MDP.
- 3.1.1a: *Financial Sustainability Policies - New development should shall be directed to areas with existing infrastructure, where feasible.*
- 3.5.5 – *Development in hazard areas*: It is unclear why RVC would entertain development in hazard areas?
- *Conceptual Scheme Requirements*: The City would request the addition of a requirement to conduct a cumulative effects assessment for development located within the source watershed – to ensure no decrease in water quality resulting from the proposed. City would suggest this as good practice at ASP level as well.

Appendix 1: Initial Comments Provided by Water Resources – unaddressed in RVC response letter**SECTION 1.6 PLANNING FRAMEWORK**

- There appears to be a major gap in aligning the policies of Area Structure Plans (and subsequent Conceptual Schemes and Master Site Development Plans) to the Land Use Bylaw (and subsequent Redesignations, Subdivisions and Development Permits). Based on Water Resources review of various land use and development applications, The City strongly recommends that this gap is addressed within Rocky View County’s planning system in order to ensure orderly sustainable growth that aligns to its MDP. This planning framework gap should also be addressed in Section 1.6.5 – Implementation of Plans

SECTION 2.1 POPULATION AND HOUSING TRENDS**2.3 RESIDENTIAL GROWTH**

- (f): Primary Residential Areas should include some discussion on the types and levels of service that are required and if they will be provided by the County, private utility or via intermunicipal agreement.
- (h): stormwater management plans should be required in Hamlet developments because of potential downstream impacts to neighbouring municipalities;
- Section 2.3.3: comment: fragmented county development is a concern for The City of Calgary

2.5: HAMLET DEVELOPMENT

- Strongly that this section includes a discussion of the types and levels of services that are appropriate for this type of development pattern;
- A master site development plan should be required prior to development approvals in any hamlet, that includes servicing and an environment impact assessment
- Recommend that servicing agreements must be in place prior to development and land use approvals

SECTION 3.1: FINANCIAL SUSTAINABILITY

- Recommend a discussion of types of services provided and where intermunicipal services are required for different development types

3.1.1: FINANCIAL SUSTAINABILITY POLICIES

- Suggest adding the following language **in bold**:
 - “Prior to approving a development proposal, the County should ensure that **infrastructure servicing is in place and** that full cost recovery...”

3.3: NATURAL RESOURCE DEVELOPMENT**3.3.1: AGGREGATE DEVELOPMENT**

- suggest adding language requiring an environmental impact assessment as aggregate development has the potential to impact water resources in adjacent municipalities

3.5: ENVIRONMENT

- It is somewhat unclear what is fully captured in “environmental feature” beyond the examples that are provided. The draft MDP also indicated that environmental features are “potentially important” but does not indicate why these features are important in order to provide direction to assess for protection or impact mitigation. We suggest adding in additional details and explanation of these terms.
- Recommended that RVC incorporate Environmentally Sensitive Areas criteria and definition into the MDP in alignment with current direction of the CMRB. The stewardship of ESAs is essential to the long-term maintenance of ecosystem function and services within the region. If available, ESAs should be delineated on a map.

3.5.2 WATER

- There is a significant policy gap in this section regarding the protection of surface water quality and quantity and the need to protect drinking water sources for adjacent municipalities.
- Where does the MDP commit that the growth approved in the Growth Concept Areas will meet the necessary requirements to not degrade the watershed and, specifically, the water that flows to downstream users? This of keen interest to The City given the extensive growth identified in the Bow and Elbow source watersheds. The language on page 15 “Future development should avoid or mitigate impacts to these areas” would benefit from additional action items or stronger language to help communicate the importance of this. .
- A large future planning area is identified along Highway 8, in the Elbow source watershed. The text on page 15 indicates “these areas... will require ASPs or conceptual schemes to demonstrate how future growth is accommodated in a sustainable manner.” It is unclear what is meant by this statement.
- Population and economic growth within the region require a secure and safe water supply. Protection of watershed health and source water quality needs to be considered in concert with other planning outcomes. The Environmental Policy Area identifies a specific objective that “drinking water sources are protected” but does not include specific policies related to source water protection. Possible additions could include preserving lands critical to watershed protection and source water quality, safeguarding source water catchments, and incorporating source watershed overlays in land use planning decisions through intermunicipal coordination and the CMRB
- The Growth areas outlined in Figure 2 show a strong concentration of primary residential development taking place in the Bow and Elbow Watershed that raises concerns around the cumulative impacts of development in the Source Watershed. This section should include policy statements around how impacts on source water will be mitigated.

SECTION 3.6 UTILITY SERVICES

- Located on page 5 of the Draft MDP “....the provision of services to these areas can become a long-term burden on the County’s finances.” How will this be managed for water, wastewater and stormwater services? Page 10 lists all the ‘additional Plans’ but the list does not include A Master Plan for Water, Wastewater and Stormwater. This Plan would be valuable to the City to

further understand the County's approach to deliver efficient and sustainable servicing without detriment/degradation to the watershed.

- With the projected growth outlined in section 2.1, a long term servicing plan would be important as the shift from country residential to mix residential development has different levels of service required. As septic fields and well water are not a sustainable servicing plan long term alternatives should be discussed.
- Located on page 48 Action 3.7 "Identify core County services". Additional details on what this could potentially include would be helpful.

3.6.3 WASTEWATER MANAGEMENT

- Please define *carrying capacity* for wastewater treatment systems and how that information will be shared with neighbouring municipalities that could be impacted by potential water quality degradation

3.6.4 STORMWATER MANAGEMENT

- Recommend adding a policy in this section that requires stormwater management plans and regulatory approvals from the Province to be circulated to adjacent municipalities if within 1 km of a shared boundary

SECTION 4.1 INTERGOVERNMENTAL RELATIONSHIPS

- This section should include a policy statement that speaks to promoting and fostering continued partnerships with regional municipalities to create and maintain an ecological network and coordinate on source water protection.

GENERAL COMMENTS:

- On page 18 of the Draft MDP indicates that new ASPs should 'address' 'utility connections'. Additional action items would be helpful to assist in long range planning for utility connections.
- Natural infrastructure (i.e. natural assets and engineered elements) provides important ecological services, and can include wetlands, trees, riparian areas and other open spaces. Integrating natural infrastructure into land use planning can help ensure conservation, support growth and maintain services such as water supply. City-wide policies could be expanded to include principles of natural infrastructure into land use and development decisions.

5. RECREATION CONSIDERATIONS AND IMPLICATIONS

Rocky View County's revised Municipal Development Plan (Dec 2020) does not provide additional clarification on the provision of recreation services and facilities within Rocky View County, and no recreation related policies have been added or edited in the draft. Additionally, most of Recreation's comments on the previous MDP draft remain unresolved.

The MDP proposes significant population growth (17,546 people by 2040) in areas adjacent to Calgary and provides very little direction on what recreation services or facilities will be added or expanded to support this growth. Without clear direction for the provision of recreation services within the MDP

there is concern that the lack of polices will result in uncoordinated regional recreation planning, and additional costs born by The City as more County residents visit City recreation facilities. There is a serious risk that existing and planned City recreation facilities will become overburdened by additional County residents, negatively impacting Calgarian's ability to access facilities and programming that provide critical health and wellness benefits.

The County has addressed most of our previous draft MDP comments by stating that their Recreation Master Plan will provide recreation policy direction, but no details are provided on the how the Master Plan will achieve this. Calgary Recreation has requested (through the County's Recreation Master Plan engagement process) a copy of the draft Recreation Master Plan. The Plan, however, has not been sent, and the Plan engagement materials reviewed by Recreation provide little detail or information about how the County plans to provide recreation services in growth areas. Without this additional information, it is challenging to conduct regional recreation planning, including the 2021 regional recreation study that is being undertaken by The City, County, and City of Chestermere. Receiving clarity on the County's recreation plans and policies is also important for planning Recreation capital projects.

Below is a summary of Calgary Recreation's responses to the revised draft MDP and the County's comments:

- Greater clarity is needed within the MDP on how the County's MDP, Recreation Master Plan, ASPs, and Local Plans interrelate to provide recreation planning direction, and whether the MDP's recreation policies will be updated or strengthened once the Recreation Master Plan has been approved by Council.
- As the MDP recreation policies (3.8.5 a-e) are so high-level, it is requested that the County provide information on how the Recreation Master Plan indeed addresses our previous comments, including:
 - It is assumed that under the Municipal Development Plan, Rocky View County will not be providing recreational facilities for residents. This can be anticipated to mean that residents will use facilities provided by adjacent municipalities such as Calgary, Cochrane, and Airdrie. What specific guidance does the Recreation Master Plan provide for future recreation cost sharing agreements with The City?
 - How Rocky View County plans on collaborating with The City and neighbouring municipalities for shared recreation services?
 - How the County – Calgary Regional Recreation Study and Options for Enhancing Regional Recreation document (that was prepared by the Recreation Servicing TAG and unanimously approved by the CMRB) have been incorporated into MDP and Recreation Master Plan?
 - What does the Recreation Master Plan say regarding the County's 'appropriate provision of facilities' in growth areas, and the specific prioritization and planned locations of those facilities?



November 20, 2020

City File: RV20-15

Attention: Dominic Kazmierczak

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

SUBJECT: Rocky View County's Draft Municipal Development Plan (circulated October 21, 2020)

Dear Mr. Kazmierczak,

Thank you for your recent circulation of the draft Rocky View County Municipal Development Plan. The City of Calgary (The City) Administration has reviewed the draft plan in consideration of Rocky View County/City of Calgary Intermunicipal Development Plan ("IDP") and the Calgary Metropolitan Region Board Interim Growth Plan ("IGP").

The proposed draft of the Rocky View County (County) Municipal Development Plan (MDP) is a significant, new vision for the County. The draft plan marks a shift from focusing development into rural hamlets, to instead capturing a broad range of development opportunities; some of which are dependent upon infrastructure in the region, and also infrastructure, services, and labour from Calgary.

At this time, The City is not able to support the draft Municipal Development Plan (MDP) as currently presented, due to absence of intermunicipal consultation and significant transportation, servicing, source water, and stormwater impacts that could cause detriment to The City of Calgary. The City of Calgary requests that the MDP not be considered for approval until there is full understanding of the impacts on City infrastructure and services associated with the full build out, and that meaningful and robust policy controls are in place to ensure proper servicing. The City requests that the draft MDP be referred to the Rocky View-Calgary Intermunicipal Committee (IMC) in December for review in accordance with IDP section 15.3 *Resolution of Intermunicipal Matters*. It is our hope to resolve the significant issues arising from the draft plan and ensure that a mutually beneficial solution can be achieved.

In addition to the initial comments and questions provided in our preliminary response letter dated May 11, 2020, The City offers the following general comments for your consideration.

Summary

The draft MDP proposes a significant amount of “Priority Growth Areas” of residential and employment areas; increasing exurban growth surrounding Calgary. However, without identifying sufficient service provision and growth management mechanisms, we are concerned that the MDP policies will create planning uncertainty by enabling and increasing boundary development over the build-out of “*Hamlet Growth Areas*” and existing settlement areas. MGA provisions call for logical and orderly development; it is unknown where development will occur next.

Without a cost-sharing framework, we are concerned that unfunded infrastructure upgrades and servicing costs associated with County development will instead be born by The City and will continue the pattern of inadvertent subsidization of services provided to RVC residents and businesses. It is inequitable for County development to utilize Calgary’s tax-supported infrastructure and services and not contribute equitably to Calgary which makes those opportunities possible. Also, without sufficient source water protection, future residential growth may impact drinking water sources in the Bearspaw and Glenmore Reservoirs.

The draft MDP also proposes to plan out half of Calgary’s Industrial Growth Area and a portion of our Residential Growth Area long identified in our Intermunicipal Development Plan. These areas are intended to be considered for future annexation to Calgary.

As a general principal, development within the County Plan should not have a negative financial, social or environmental impact on Calgary. We have many specific, constructive comments that we would like to share with your staff. We hope for further opportunities to work together on this very important plan.

1. Intermunicipal Engagement

On February 10, 2020, RVC met with City Administration to introduce the MDP project and the approach to the analysis. In response to many unknowns at that time, Calgary Administration’s preliminary comment letter from May 11, 2020 requested “*further engagement to address our questions and concerns...*”. Our ask was “*that the process provide for sufficient time to undertake deliberative dialogue, particularly at key milestones*” and that “*we would like to discuss ways to ensure that the policy framework that does not result in proposed development negatively impacting Calgary’s infrastructure and services.*”

The County’s introductory meeting held in February was the only meeting and occurred prior to the development of the growth concept. The City first learned of the proposed concept through the circulation of the draft plan. Calgary Administration have not been sufficiently engaged or contacted to this date. It is our request that the item be referred to the upcoming Intermunicipal Committee so that a path to mutually beneficial solution can be identified.

2. Growth Management

The RVC draft MDP provides very few tools or policies to manage growth. The plan outlines that a “suitability analysis” was used to identify growth priority areas. The plan states that “*The suitability analysis used spatial data to identify landscapes that may not be appropriate (e.g. wildlife corridors, wetlands, agricultural lands), and factors that would increase the suitability of an area for additional development (e.g. access to existing transportation infrastructure and servicing).*” The suitability analysis did not factor social or economic conditions that would further delineate appropriate growth priority areas.

The draft plan outlines that the growth and development for the next 20 years will be guided by the Growth Concept. There seems to be a lack of prioritization of the growth through the Growth Concept and no population forecasts associated with the concept were provided. The plan speaks to accommodating 60,000 people by 2040 but does not address whether the lands within the growth concept accommodate this or more population.

As growth management is closely related to service provision, allowing such large amounts of land to grow with very few policies tying growth to servicing or understanding the cumulative impacts of this growth could have detrimental impacts to The City of Calgary.

3. **Omni ASP and surrounding area.** The draft MDP proposes an “*Employment Area*” beyond the approved geography for Omni ASP. This is inconsistent with the MGB Board Order remedy of a reduced plan area (MGB 068/18). The draft plan lacks sufficient provisions to require upgrades to the transportation infrastructure within Calgary. We see this as a significant concern because as the order states “*there are few or no plans in place for any of these improvements, and no identified sources of funding to pay for them.*” It is premature to plan the entirety of Omni ASP and the adjacent lands, located along Calgary’s northeast boundary, as a priority “*Employment Area*” until an agreement can be reached to ensure servicing costs associated with County development are covered.

4. Alignment to the Intermunicipal Development Plan (IDP)

The County’s draft MDP proposes “*Employment Areas*” within lands long identified as a *City of Calgary Growth Areas* under the policies of our mutually agreed to IDP. We are concerned this will prejudice Calgary’s future Residential and Industrial Growth Areas. The draft Municipal Development Plan is not in alignment with the intent and objectives of the IDP. For example, Section 8.0 Growth Corridors/Areas and Annexation of the IDP outlines that an objective of the plan is recognize growth corridors for both municipalities. The draft MDP must be revised to be consistent with the IDP as outlined in section 632 (4) of the Municipal Government Act.

5. Alignment to the Interim Growth Plan (IGP)

IGP Section 3.2.2 outlines that municipalities should collaborate to coordinate planning for land-use, infrastructure, and service provision with other municipalities, where appropriate. Rocky View County did not engage in a structured engagement process with The City of Calgary throughout the creation of this significant plan.

In our view, the draft MDP is not in alignment with the principles of the Interim Growth Plan as it has large impacts on regional infrastructure, source water quality, and promotes inefficient use of land. Existing regional infrastructure, including water treatments plants, are shown in IGP Schedule 5: Transmission Corridors – Water. IGP Section 3.5.2.1 c. calls for the provision of *“mitigation measures and policies to address identified/ potential adverse impacts on regionally significant transmission corridor rights-of-way or related infrastructure.”* The proposed growth concept may have large impacts on the source water quality for both the Bearspaw and Glenmore Reservoirs.

6. Sourcewater Protection

A strong concentration of primary residential development is proposed to take place in the Bow and Elbow Watersheds which raises concerns around the cumulative impacts of development in the Source Watershed. The draft MDP should include policy statements around how impacts on source water will be mitigated. At present, there is a significant policy gap with regards to the protection of surface water quality and quantity and the need to protect drinking water sources for adjacent municipalities. No specific policies are identified beyond the objective that *“drinking water sources are protected”* (p.34). The MDP should demonstrate greater commitment to source water protection by strengthening the language, adding action items and protecting the upland geography of the reservoir.

There is presently an inconsistency in the planning approach taken to stepping development back from the Bearspaw Reservoir: while the Glenbow Ranch ASP area proposes development to occur approximately one kilometre away, the MDP does not propose any mitigation measures along the southern side of this regionally significant infrastructure. The MDP could further demonstrate commitment by drawing from the Glenbow Ranch Mediated Agreement which recognized *“the Bearspaw Reservoir as source water for drinking water utilities”*.

The draft MDP proposes a western *“Employment Area”* along HWY 1 at HWY 22, where the Springbank Off-Stream Reservoir project (SR-1) is planned to be located. It is unclear how the plan will impact this critical piece of infrastructure for the City and the region, which is needed to mitigate flood events. The City requests that the draft MDP include policy statements to acknowledge SR-1, and policies to ensure there is no negative impacts on SR1 resulting from planning development in this area.

7. Impacts to transportation infrastructure

The draft MDP appears to focus on auto-dependent growth and has the potential for detrimental impacts on Calgary’s infrastructure and growth potential in our developing areas. MDP

transportation policies should include specific policies on transit for supporting proposed long-term growth in the County (including potential County provided transit, CMRB regional transit and or private transit provision). Given the significant changes proposed, it would be more effective for the draft MDP to follow the approval of the CMRB Regional Growth Plan to ensure County growth aligns with regional growth priorities. These include regional transit and more compact development within the County and overall region.

The City maintains that development within the County's draft MDP should not have a negative financial, social and environmental impact on Calgary. Due to the potential for detrimental impacts and due to an absence of engagement with The City of Calgary, we are unable to support the Municipal Development Plan and how it proposes to implement the vast areas of priority growth. Calgary Administration request that the draft MDP be referred to the upcoming Rocky View-Calgary Intermunicipal Committee in December for discussion so that our municipalities can achieve a mutually beneficial solution.

Thank you for the opportunity to review and comment on this draft plan. Detailed technical comments are provided in the attachment.

If you have any questions or concerns, please contact Neil Younger, Senior Strategist, Intergovernmental & Corporate Strategy at: neil.younger@calgary.ca or 403.828.1647.

Sincerely,

Kelly

Kelly Cote RPP, MCIP
Manager
Intergovernmental & Corporate Strategy
Deputy City Manager's Office
The City of Calgary
C 403.305.0207 E kelly.cote@calgary.ca

cc: Neil Younger, Senior Strategist, The City of Calgary

Attachment: Detailed Technical Comments

Detailed Technical Comments

1. PLANNING AND DEVELOPMENT COMMENTS, INTERMUNICIPAL COMMENTS

There are a number of areas in the document that present significant issues for our intermunicipal coordination; Municipal Administrations need to work on these areas. For example...

- a) Figure 1: **Planning Framework Alignment** – Intermunicipal Development Plans should be below CMRB Growth Plan and above the MDP. The figure shows IDPs outside of the CMRB Growth Plan Framework which it is a statutory plan and subject to it. Also, the figure does not provide an understanding that an MDP is subordinate to IDPs.
- b) Figure 2: **Growth Concept Map** identifying Priority Areas for Growth proposes “*Employment Areas*” within Calgary’s residential and industrial Growth Areas long identified in the IDP. The proposed land use is inconsistent with the IDP. The City has not been engaged in planning these areas and does not support these areas being priority growth areas for Rocky View County.
- c) P.47, Section 4.1.3 Annexation. “*Policy e) New or amended Intermunicipal development plans should reflect the goals and policies of the MDP.*” Our MDPs are an important input but are subject to IDPs; we believe the appropriate basis for IDPs is mutual interest and cooperation. As such we cannot support this policy as our future growth areas are impacted by this MDP, which is inconsistent with our IDP. Intermunicipal discussion is required.
- d) P.21, Section 2.4.1 Employment Areas. A statement lists characteristics of Employment Areas in *Figure 2* as being “Regulated by existing statutory policy, and/or identified in annexation agreements.” Please note that our annexation agreement was an important document to identify growth areas that were jointly agreed to by our municipalities, and to inform the 2012 Intermunicipal Development Plan approved by both Councils. The City of Calgary does not consider Calgary’s Growth Areas to be Rocky View County’s Employment Areas. We call on the County to recognize and respect the Growth Corridors founded through our mutual annexation agreement and identified in our statutory Intermunicipal Development Plan.
- e) The City requests data be provided on amount of population and jobs that can be accommodated in the Growth Concept.
- f) The City recommends that growth areas be prioritized and growth management through policy or mapping to ensure appropriate levels of servicing can be provided.

- g) The City recommends that additional plans and studies should inform the MDP, most significantly additional transportation studies and the Bearspaw Task Force Trilateral Consensus Report.
- h) Figure 2: Growth Concept Map Identifying Priority Areas for Growth proposes a significant amount of residential and employment lands without prioritizing those lands or providing an understanding of the amount of growth contained within those areas. The plan states a 20-year time horizon, The City is requesting the geodemographic information that informed this map and how it is tied to population projections.
- i) Section 2.3.1.h.i outlines that maximum densities should be established in ASPs. The City would encourage minimum densities be stated in order to facilitate the growth that provides for more efficient use of land.
- j) The City recommends that Section 2.4.1 Employment Areas outline policy for the provision of transit for employment areas.
- k) Section 3.1 Financial Sustainability outlines that careful management of growth and development is necessary and a desired assessment split ratio. These policies are not supported throughout the document and within the Growth Concept. There is no prioritization of growth or growth management policies outside of servicing. It is recommended that the plan prioritize growth areas or provide further growth management policies.
- l) The draft MDP is silent on a number of areas including equity, Indigenous relations, future of mobility, livability and quality of life. The City recommends Rocky View County consider addressing these policy areas within the MDP.
- m) **Planned and Future growth areas map.** Figure 3 identifies unplanned lands beyond North Springbank ASP as "*Planned Areas*". In addition, plans under review are also identified as "*Planned Areas*" (Springbank, Janet, etc) but without specific guidance on how existing plans will proceed. Will it permit large future intensification? How are plans in process guided?
- n) Future Planning Areas. "*Future Planning Areas*" approvals should occur following approval of the CMRB Regional Growth Plan.

2. TRANSPORTATION COMMENTS

- a) Major concentrations of auto-dependent development is proposed to be located adjacent to Calgary, which would require a significant need for new or expanded major infrastructure. The City is concerned that this pattern of development will create excessive traffic volumes that could impact Calgary's transportation system, for example, our arterials and connections to Stoney Trail and our developing areas.

- We ask that the draft MDP acknowledge the need to work with Calgary to identify and address infrastructure impacts, and that participation in cost-sharing agreements may be required.
- b) Without an identified transit solution or other modes of transportation, the impact of single occupancy vehicle travel is expected to be felt on city networks.
- c) Approval of the MDP should occur following approval of the CMRB Regional Growth Plan to ensure County growth aligns with Regional growth priorities. These include regional transit and more compact development within the County and overall region.

3. CALGARY TRANSIT

Please find below comments from Calgary Transit on the Rocky View County MDP. CT's main comments are in relation to the need for greater mention and clarity around transit. Additionally, growth in Rocky View at the City boundary may affect Calgary's ability to develop, with the resulting impact and expectations pressuring Calgary services such as transit.

General Comments:

1. Recommend that a transit section be included similar to the airport/railway section. The content of the section would be indicating priority areas for transit growth corridors, and direction for local area planning (i.e. local area plans which include a regional transit component should provide direct paths of travel available to the transit service, avoid having your transit connection on a major deviation, or having discontinuous road networks that are difficult to connect in a line for a transit service).
2. Regional transit connections should be encouraged where demand exists. Recommend RVC and hamlet administrative authorities consult with Calgary Transit on the planning of such services.
3. Growth areas in an intermunicipal interface area between RVC and Calgary should be planned to include future transit services with minimal retrofitting required.
4. Railway planning is encouraged to consider planning for potential railway expansion in addition to the repurposing of unused lines. Existing rail ROWs may be expanded in the future if needed for capacity purposes, particularly for regional or intercity passenger rail, but potentially also for freight.
5. Suggest adding policies that mention pedestrian and active mode corridors and pathways should connect to transit.
6. Suggest adding section or policies on air quality and GHG emissions, similar to how the plan already mentions water quality. Note that transit can play a beneficial role in maintaining and improving air quality.

Section Specific Comments:

1. **2.3.1(b):** This policy appears to conflict with policies for growth areas and the preferred growth scenario (CMRB), which directs growth into defined transit-supportive corridors.
2. **2.3.1(h)(vi):** We appreciate that new ASPs should address regional transit connections. It would be good to see this indicated on the ASPs we've recently reviewed (i.e. Springbank).

3. **2.3.2:** Suggest adding language that new ASPs for Country Residential should be discouraged in or adjacent to identified growth corridors. This is especially important once the Growth Plan is adopted and TOD corridors are identified.
4. **2.4.1:** Suggest adding policy about 'provision for regional transit connections,' as employment areas are likely to draw employees from the region, of which many rely on transit to get to work. Access to transit on the residential side is great, but if it doesn't connect to the destination then value is diminished.
5. **2.5.2:** Suggest adding a policy mentioning transit connections, similar to what is already included in the Primary Residential Areas and Hamlet Growth Areas sections. This could be a less-binding 'may' policy since Small Hamlets likely have less need for transit than other growth areas, but transit should be mentioned and included as a possibility.
6. **3.2 Transportation, introductory paragraph:** Suggest mentioning that transit can help alleviate pressures on the transportation system.
7. **3.2.1 (e):** Suggest explicitly mention transit should be included in the RVC Transportation Model to create a more accurate representation of trips in the County.

4. WATER RESOURCES

Water Resources provides the following comments on the draft Municipal Development Plan (MDP).

SECTION 1.6 PLANNING FRAMEWORK

- There appears to be a major gap in aligning the policies of Area Structure Plans (and subsequent Conceptual Schemes and Master Site Development Plans) to the Land Use Bylaw (and subsequent Redesignations, Subdivisions and Development Permits). Based on Water Resources review of various land use and development applications, The City strongly recommends that this gap is addressed within Rocky View County's planning system in order to ensure orderly sustainable growth that aligns to its MDP. This planning framework gap should also be addressed in Section 1.6.5 – Implementation of Plans

SECTION 2.1 POPULATION AND HOUSING TRENDS

2.3 RESIDENTIAL GROWTH

- (f): Primary Residential Areas should include some discussion on the types and levels of service that are required and if they will be provided by the County, private utility or via intermunicipal agreement.
- (h): stormwater management plans should be required in Hamlet developments because of potential downstream impacts to neighbouring municipalities;
- Section 2.3.3: comment: fragmented county development is a concern for The City of Calgary

2.5: HAMLET DEVELOPMENT

- This section is encouraged to include a discussion of the types and levels of services that are appropriate for this type of development pattern;
- A master site development plan should be required prior to development approvals in any hamlet, that includes servicing and an environment impact assessment
- Recommend that servicing agreements must be in place prior to development and land use approvals

SECTION 3.1: FINANCIAL SUSTAINABILITY

- Recommend a discussion of types of services provided and where intermunicipal services are required for different development types

3.1.1: FINANCIAL SUSTAINABILITY POLICIES

- Suggest adding the following language in **bold**:
 - “Prior to approving a development proposal, the County should ensure that **infrastructure servicing has been identified and planned for** and that full cost recovery...”

3.3: NATURAL RESOURCE DEVELOPMENT*3.3.1: AGGREGATE DEVELOPMENT*

- suggest adding language requiring an environmental impact assessment as aggregate development has the potential to impact water resources in adjacent municipalities

3.5: ENVIRONMENT

- It is somewhat unclear what is fully captured in “environmental feature” beyond the examples that are provided. The draft MDP also indicated that environmental features are “potentially important” but does not indicate why these features are important in order to provide direction to assess for protection or impact mitigation. We suggest adding in additional details and explanation of these terms.
- Recommended that RVC incorporate Environmentally Sensitive Areas criteria and definition into the MDP in alignment with current direction of the CMRB. The stewardship of ESAs is essential to the long-term maintenance of ecosystem function and services within the region. If available, ESAs should be delineated on a map.

3.5.2 WATER

- There is a significant policy gap in this section regarding the protection of surface water quality and quantity and the need to protect drinking water sources for adjacent municipalities.
- Where does the MDP commit that the growth approved in the Growth Concept Areas will meet the necessary requirements to not degrade the watershed and, specifically, the water that flows to downstream users? This of keen interest to The City given the extensive growth identified in the Bow and Elbow source watersheds. The language on page 15 “Future development should avoid or mitigate impacts to these areas” would benefit from additional action items or stronger language to help communicate the importance of this.
- A large future planning area is identified along Highway 8, in the Elbow source watershed. The text on page 15 indicates “these areas... will require ASPs or conceptual schemes to demonstrate how future growth is accommodated in a sustainable manner.” It is unclear what is meant by this statement. Specific policy language would be helpful.
- Population and economic growth within the region require a secure and safe water supply. Protection of watershed health and source water quality needs to be considered in concert with other planning outcomes. The Environmental Policy Area identifies a specific objective that “drinking water sources are protected” but does not include specific policies related to source water protection. Possible additions could include preserving lands critical to watershed protection and source water quality, safeguarding source water catchments, and incorporating

source watershed overlays in land use planning decisions through intermunicipal coordination and the CMRB

- The Growth areas outlined in Figure 2 show a strong concentration of primarily residential development taking place in the Bow and Elbow Watershed that raises concerns around the cumulative impacts of development in the Source Watershed. This section should include policy statements around how impacts on source water will be mitigated.

SECTION 3.6 UTILITY SERVICES

- Located on page 5 of the Draft MDP “....the provision of services to these areas can become a long-term burden on the County’s finances.” How will this be managed for water, wastewater and stormwater services? Page 10 lists all the ‘additional Plans’ but the list does not include A Master Plan for Water, Wastewater and Stormwater. This Plan would be valuable to the City to further understand the County’s approach to deliver efficient and sustainable servicing without detriment/degradation to the watershed.
- With the projected growth outlined in section 2.1, a long term serving plan would be important as the shift from country residential to mix residential development as different levels of service will be required. As septic fields and well water are not a sustainable, servicing plan long term alternatives should be discussed.
- Located on page 48 Action 3.7 “Identify core County services”. Additional details on what this could potentially include would be helpful.

3.6.3 WASTEWATER MANAGEMENT

- Please define *carrying capacity* for wastewater treatment systems and how that information will be shared with neighbouring municipalities that could be impacted by potential water quality degradation

3.6.4 STORMWATER MANAGEMENT

- Recommend adding a policy in this section that requires stormwater management plans and regulatory approvals from the Province to be circulated to adjacent municipalities if within 1 km of a shared boundary

SECTION 4.1 INTERGOVERNMENTAL RELATIONSHIPS

- This section should include a policy statement that speaks to promoting and fostering continued partnerships with regional municipalities to create and maintain an ecological network and coordinate on source water protection.

GENERAL COMMENTS:

- On page 18 of the Draft MDP indicates that new ASPs should ‘address’ ‘utility connections’. Additional action items would be helpful to assist in long range planning for utility connections.
- Natural infrastructure (i.e. natural assets and engineered elements) provides important ecological services, and can include wetlands, trees, riparian areas and other open spaces. Integrating natural infrastructure into land use planning can help ensure conservation, support growth and maintain services such as water supply. County-wide policies could be expanded to include principles of natural infrastructure into land use and development decisions.

5. ECOLOGICAL FEATURES

- a) Section 3.5.1 Growth Management is very limited to ecological features. The City recommends that a Growth Management section be drafted that aids in promoting efficient use of land and regional infrastructure.
- b) The IDP states that both municipalities should implement ER setback guidelines to protect riparian areas and water quality. The draft MDP should contain policies about ER setbacks.

6. RECREATION CONSIDERATIONS AND IMPLICATIONS

SUMMARY

- The MDP continues to direct County population growth to areas adjacent to, or in close proximity to Calgary, and provides little to no direction on what recreation services or facilities will be in place to support this growth.
- As noted in the Draft Regional Recreation Study (2020), there is a need for recreation services cost-sharing as it is recognized RVC residents utilize City recreation facilities.
- The majority of the County's growth areas are located west/northwest of Calgary. As a result, City facilities in west and northwest Calgary will likely see the greatest increase in pressure from RVC population growth.
- The County has indicated, through policy, that they will collaborate with the City on regional recreation decision-making.
- Recognizing that intermunicipal collaboration is a provincial priority and a priority for all municipalities within the CMR, there is a need for additional details on how RVC plans to coordinate recreation service delivery with municipalities to promote sustainability, economic and community well-being.

SPECIFIC COMMENTS

GUIDING PRINCIPLES – COMMUNITY DEVELOPMENT

- In the MDP, Rocky View County has said it will build resilient communities and welcoming neighbourhoods through greater access to recreation amenities, valued gathering spaces and creative design (1.3) No specific information, however, is provided regarding the current approach being used to address the recreation needs of residents through agreements with surrounding municipalities (including Airdrie, Chestermere and Cochrane, not including Calgary) and the tools being considered to achieve their vision moving forward (e.g. cost sharing, levies, Intermunicipal Collaboration Frameworks)

REGIONAL PLANS: CALGARY METROPOLITAN REGIONAL BOARD GROWTH PLAN (1.6.2)

- The MDP identifies that RVC will work in the spirit of collaboration with regional partners... to find mutually beneficial solutions to planning and development challenges... (Guiding Principle 6). However, more details are needed within the Intergovernmental Relationships section (4.1) on the approach envisioned. Specifically with respect to the CMRB Regulation AR190/2017. It sets out the objectives for the CMRB Servicing Plan, which includes facilitating the orderly, economical and environmentally responsible growth in the region. The CMRB has identified recreation as a key area for collaboration on service provision. There is no specific direction on how the Options for Enhancing Regional Recreation document, that was prepared by the

Recreation Servicing TAG and unanimously approved by the CMRB, will be applied. For example, the following does not appear to be incorporated into the MDP:

Regional Recreation Definition

- A regional recreation facility, space, program or service has a realistic potential of use by, and broader benefits to, residents from outside the municipal boundaries in which it is provided.

Vision

- Municipalities enhance coordination, optimize public investment, and leverage resources from within and outside the region to support regional recreation facilities, programs and services. These regional recreation assets and services enhance coordination, optimize public investment, and leverage resources from within and outside the region.

STATUTORY PLANS: INTERMUNICIPAL DEVELOPMENT PLANS (1.6.3)

- No specific direction is provided on coordinating planning for land-use, infrastructure, and service provision to ensure “Both municipalities are committed to working together to achieve coordination wherever possible so that the effect that we have on one another and our residents is positive” (IDP). In particular with respect to:
 - Explore the feasibility of developing overall intermunicipal recreation master plan (IDP 9.1.1 (d))
 - Cooperate in the exploration of cost-effective ways of delivering recreational services that benefit both municipalities (IDP 9.1.1 (f))

GROWTH AREAS (2.2)

- Provision of recreational, community, social and cultural facilities or amenities will be necessary to support the anticipated population growth of 17,576 by 2040. Specific direction on how the needs will be identified and met is not provided to help guide ASP land use planning, and service delivery decisions and proactively address the risk of Rocky View residents being reliant upon services provided within The City of Calgary.
- Residential land uses are the primary form of development of development in Rocky View County. The focus on residential development without specific policies that guide the provision of recreational, community, social and cultural facilities within Rocky View County will be detrimental to The City of Calgary without commensurate increase in compensation by the County to The City of Calgary.
- Existing Area Structure Plan areas or Conceptual Scheme areas have been re-designated as priority growth areas. Most of these areas are adjacent to Calgary (e.g. Bearspaw, Balzac West, Elbow Valley). They have remaining development capacity and will continue to grow.
- A new residential growth area, Elbow Valley (West), has been added. This area is located southwest of Calgary along Highway 8.
- As most of the County’s population growth is planned to be near Calgary, City recreation facilities in close proximity to RVC and near major highways will likely see increased pressure from County residents (e.g. Rocky Ridge YMCA, Village Square Leisure Centre).

- Policies identify that recreation uses should be located in Hamlets, Primary Residential Areas, or Employment (2.6.1 a), but can be located elsewhere (2.6.1 c). No specific direction, however, is given to where, or how many recreation facilities are planned to support additional population growth.
- Policies indicate that recreation investments will be prioritized based on population density and resident need (3.8.5 b), and the County will collaborate with neighbouring municipalities for regional recreation decision-making (3.8.5 e). More details are required on what the decision making process will entail.

GROWTH CONCEPT MAP (FIG. 2)

- In addition to the provincial parks, existing and planned regional recreation facilities and amenities (as defined above) (e.g. Springbank Park for all Seasons, regional pathways respectively) should be included within the Growth Concept Map or additional Community Services Map so that regional recreation services gaps are illustrated.

POLICY DIRECTION

- Policies identify that recreation uses should be located in Hamlets, Primary Residential Areas, or Employment (2.6.1 a), but can be located elsewhere (2.6.1 c). No specific direction, however, is given to where, or how many recreation facilities are planned to support additional population growth.

PERFORMANCE MEASURES (TABLE 03)

- An increase in the number of facility operations cost sharing agreements is identified as an MDP performance measure. However, no enabling or supporting is policy is included that addresses recreation facility cost sharing agreements.

Recreation	Number of facility operations cost sharing agreements	Increase
	Number of operational and capital grants to non-profits	Increase
	Number of Recreation Master Plan partnership recommendations implemented	Increase

CONCEPTUAL SCHEME REQUIREMENTS (APPENDIX C)

A community needs assessment should be included as a requirement for Conceptual Schemes and ASPs to ensure the “appropriate provision of municipal infrastructure and community services. Satisfying these aspirations will involve the assessment of community needs across the County, partnerships with community stakeholders and service providers, recruitment of regional institutions, public consultation, and allocation of land and resources.” (3).

November 23, 2020

Rocky View County
262075 Rocky View Point
Rocky View County, Alberta T4A 0X2

Attention: Dominic Kazmierczak, Supervisor Planning (Policy)

**RE: PROPOSED ROCKY VIEW COUNTY MUNICIPAL DEVELOPMENT PLAN
(COUNTY PLAN)**

Dominic,

Thank you for the opportunity to comment on the proposed County Plan. We recognize that it is a high-level document that will guide development in the County and commend you for the time and effort spent in its creation. Please find our comments below on some of the policies:

Section 3.2.1 Transportation Planning and Development

b) Partner with other municipalities and developers to co-ordinate transportation improvements and the expansion of transportation infrastructure.

c) Transportation network development shall be based on existing development, future growth areas, area structure plans, and interconnectivity with adjacent municipalities.

As per the statements above, we look forward to opportunities in the future to collaborate on issues of mutual interest. In particular, a discussion on the priority growth areas in Janet and Conrich, which extend along Chestermere's north and south boundaries. There is the potential that Chestermere streets could be used as connections between Rocky View County residential and employment areas. Please take into consideration the Calgary/Chestermere Intermunicipal Development Plan has identified Range Road 284 as an interface street and Section 4.1 Interface Street Classification and Character states the following:

- 1. The Interface Street should have a unique functional classification to enable the vision, core ideas, intents and policies of The Plan. The Interface Street will become a modified street classification that will reflect standards in Chestermere and Calgary.*

2. *The Plan Area shall be integrated with regional and local transportation networks.*
3. *The Plan Area should allow for access to the Local Street Network using all travel modes.*
4. *Direct, comfortable and safe pedestrian, cyclist, transit and motor vehicle travel along and across the Plan Area shall be provided.*
5. *The Interface Street should provide for movement of people and goods throughout the Plan Area.*
6. *The Interface Street should accommodate a design speed of 60 km per hour.*

3.4.3 Confined Feeding Operations

b) A confined feeding operation, including its minimum distance of separation, should not be located within the boundary or notification zone of an intermunicipal development plan, statutory planning area, hamlet, residential area, institutional use, or federal, provincial, or municipal park or recreation area.

Since the City of Chestermere does not have an Intermunicipal Development Plan with Rocky View County, please consider firmer policy language to ensure that confined feeding operations are at a distance of separation from municipal neighbours.

3.8.1 Park Development, Connectivity, and Maintenance

b) Partner and collaborate with adjacent municipalities, the Province, school divisions, conservation agencies, community groups, developers, and other organizations to develop and maintain the parks and open space system, pathways and trails network, and associated amenities.

We appreciate the willingness to partner and collaborate with adjacent municipalities and look forward to continue our discussions on planning for regional recreation.

We look forward continue and strengthen our positive working relationship with Rocky View County. Please do not hesitate to contact me if you have any further questions or concerns regarding these comments at (403) 207-7112.

Sincerely,

Benazir Thaha Valencia
Senior Planner, Community Growth & Infrastructure
City of Chestermere
bthaha@chestermere.ca

Comment #	Town of Cochrane Comments	Rocky View County Response
1	<p>Cochrane has a unique identity with rural character and the gateways into our community are important to maintain this identity and significance within the region. These gateways are identified as Highway 22 north and south of the Town as well as Highway 1A east and west of the town. An important piece of the Cochrane Community Vision is that "The Town will collaborate with our neighbours to ensure development within this area reinforces the rural character of these lands."</p> <p>The lands to the north and east are identified as future residential growth areas in the County's draft MOP, which has the potential to affect the rural character and identity of the area and the gateways surrounding the Town of Cochrane. The Town asks that these gateways receive more attention and consideration as they are very significant to the Town, Rocky View County and identity of the region.</p>	<p>Rocky View County remains committed to intermunicipal collaboration with the Town of Cochrane, and believes that these concerns are best addressed at the ASP stage. The County is currently reviewing the Bears paw ASP and has been receptive to the Town's concerns regarding development adjacent to the 1A leading into Cochrane from the east.</p> <p>To further address these concerns, Rocky View County has also revised 2.3.1 c) to the following:</p> <p>Development within Primary Residential areas shall be in accordance with applicable IDPs, area structure plans, and/or conceptual schemes.</p> <p>The Town believes ensuring the rural character and identity being reinforced within gateways into Cochrane is something that is beneficial to Cochrane, RVC and the region. We do not feel the proposed policy amendment captures/reflects the importance of these areas nor provides the specific direction needed to ensure they are recognized and acknowledged at ASP and/or conceptual scheme development stage. The Town requests these important gateways are reflected in the MDP.</p>
2	<p>The MOP Project Stages state that Stage 4 of Drafting the MOP conducted in the Winter- Spring of 2020 included the opportunity for neighbouring municipalities and regional partners to review and comment on the draft MOP. We do not seem to have record of this occurring. Also, other phases of engagement were detailed on the project website, we are wondering about the feedback received regionally for this plan. If so, is this something that can be shared?</p>	<p>Rocky View County has prepared public feedback reports for each phase of the project that can be found on the project website at www.rockyview.ca/MDP. The County also remains committed to ongoing intermunicipal collaboration and engagement on the proposed MDP, including earlier meetings with Town of Cochrane personnel and this draft MDP review.</p>
3	<p>The Town of Cochrane understands and appreciates the Vision and Guiding Principles outlined in the draft Plan, particularly Guiding Principle 6- Partnerships. The Town values our relationship with Rocky View County and looks forward to working together collaboratively to find mutually beneficial solutions to planning and development challenges as stated in the Plan.</p>	<p>Noted.</p>
4	<p>The draft MOP includes a number of proposed residential and employment growth areas. It is understood a development suitability analysis, utilizing factors such as access to existing transportation infrastructure and servicing, was used to identify the proposed growth areas. This has resulted in the Primary Residential priority growth areas being located primarily west of the City of Calgary, including the northern and eastern boundaries of the Town of Cochrane, and the proposed Employment Areas being located on the east side of the City of Calgary. Since the adoption of the current County MOP in 2013 roughly 5,000 new residents have moved to Rocky View County. The majority of these residents located in the hamlets of Langdon and Conrich, with Langdon being in the top two residential population growth areas in the County since 1996. Section 2.5 Hamlet Development states hamlets are home to the majority of County residents and should be the priority for residential development over the next 20 years. Should this be the case, why does the Primary Residential Priority Growth Area expand well beyond the hamlet boundaries west of the City of Calgary?</p>	<p>The Primary Residential Priority Growth Area is intended to capture a range of potential development locations, enabling the proposed MDP to be flexible and responsive to changing market conditions over the next 20 years. This pragmatic approach minimizes future housekeeping amendments that would otherwise result from changes in the regional economy while still providing a clear vision for where and how the County intends to grow.</p> <p>Rocky View County would also like to note that although the proposed MDP sets the overall growth locations, ASPs will be required for each area where new growth occurs or where the County looks to amend its development form in an existing ASP. These ASPs will require thorough intermunicipal collaboration and alignment with the Regional Growth Plan before being approved by the CMRB.</p>

<p>5</p>	<p><i>2.5.2 Small Hamlets</i> Specifically, Cochrane North/Cochrane Lake is identified as a Small Hamlet and is located in the Primary Residential Priority Growth Area, yet Section 2.5.2 Small Hamlets states that "The County will continue to maintain existing levels of service for these rural communities, ensuring sustained quality of life for residents. Due to their more isolated location, and the availability of more sustainable development locations across the County, the County may not prioritize infrastructure and servicing upgrades in Small Hamlets." Additionally, Policy 2.5.2 a) states - "New Development should occur within the existing hamlet boundary as opposed to expanding boundaries". The Cochrane North ASP only identifies roughly 2 quarter sections as hamlet development, yet the priority residential growth boundary in the draft Plan includes a significantly larger area. This illustrates an inconsistency with the policy direction noted above, as well as inconsistencies between the two plans.</p>	<p>Rocky View County respectfully disagrees that there is misalignment between these policy directives. The imperative for the County to invest or not invest in infrastructure exists independent of proposed new growth areas, particularly in light of the County's developer-pays approach to servicing outside of areas already served by municipal infrastructure.</p> <p>The Cochrane North Plan has identified hamlet development as noted, but also provides for cluster and infill development across the wider plan area. It is the County's perspective that the proposed MDP policies state that the hamlet development forms should not expand into the wider ASP area. However, the development of cluster or master planned communities outside the hamlet area are distinct and can rely upon developer-led servicing solutions.</p>
<p>6</p>	<p>The Rocky View County / Town of Cochrane IDP states that all residential development within the IDP area is to take into account urban overlay principles. The Town recommends this policy be reflected in the MDP for areas proposed for residential development adjacent to urban centres. This will help ensure future orderly urban redevelopment where applicable.</p>	<p>Rocky View County has revised 2.3.1 c) to the following: Development within Primary Residential areas shall be in accordance with applicable IDPs, area structure plans, and/or conceptual schemes.</p>
<p>7</p>	<p>Many policy sections throughout the proposed Plan identify what is to be included in future Area Structure Plans, as well as the requirements that need to be addressed before further development will be approved. Some examples include:</p> <ul style="list-style-type: none"> • Section 2.3.1 h) identifies items to be incorporated into new ASPs within the residential priority growth areas; • Section 2.3.2 b) speaks to considerations to be given when proposing larger scale Country Residential Development within the priority residential growth area; • Section 2.5.1 c) identifies items to be addressed in an ASP or ARP for a Hamlet Growth Area. <p>These sections speak to considering the impacts on County or existing infrastructure. The Town requests that these policy areas also specifically include potential impacts to municipalities in close proximity that would expectedly serve these growth areas in terms of transportation impacts, recreational impacts, school need impacts, servicing impacts, etc. Additionally, the Town requests that the Hamlet Growth Areas section include policies for the provision of school sites to support the school needs in these priority residential growth areas.</p>	<p>Rocky View County has revised 2.3.1 (h) and 2.5.1 (c) to include the following clauses:</p> <p>2.3.1 (h) vii) Where the ASP is located in areas adjacent to an intermunicipal partner, appropriate intermunicipal collaboration on key cross-boundary concerns.</p> <p>2.5.1 (c) x) Intermunicipal collaboration and key cross-boundary concerns.</p> <p>We are in agreement with the proposed policy inclusions however we would ask that they be included for all the appropriate sections (e.g. employment areas, Country Residential) or more simply add these policies to the County Wide Policy section. We would also note that these inclusions do not appear to be in the red lined versions that was sent over.</p>
<p>8</p>	<p><i>2.3.1 Primary Residential Areas</i> Policy 2.3.1 f) states that "Primary Residential Areas should receive County services identified in the applicable area structure plans, conceptual schemes or County bylaws." Assuming these services are necessary to support these proposed priority growth areas, this should become a "shall" statement to ensure the necessary servicing is provided to facilitate the proposed development.</p>	<p>RVC employs a range of servicing solutions, not all of which require County servicing. Although municipal servicing is usually preferred, the current planned densities and potential future densities for Bearspaw and Cochrane are not likely to warrant a comprehensive County servicing solution and will likely rely on local water co-ops and private or communal waste water systems. Many local co-operatives exist and are better poised to service new development than the County is in certain contexts, and as such, an imperative directive is not appropriate.</p>

<p>9</p> <p>The Town appreciates the inclusion of policies that promote partnerships with different levels of government and neighbouring municipalities. Particularly:</p> <ul style="list-style-type: none"> • Policy 3.2.1 a) and b), which speak to partnerships with the Province, neighbouring municipalities and developers to coordinate on regional transportation corridors and expansion of transportation infrastructure; • Policy 3.3.1 e) regarding cooperation between municipalities relating to aggregate activities and coordination on haul routes and mitigation of impacts on adjacent land uses; • Objectives under section 3.8 - specifically "Rocky View County partners and collaborates with neighbouring municipalities and other organizations in the development, use and maintenance of recreation facilities, parks, pathways and trails"; • Policy 3.8.5 e) "Collaborate with neighbouring municipalities for regional recreation decision making"; and • The inclusion of Section 3.9. <p>Partnerships working to ensure avoidance of duplicating services and the costs associated with that are supported and welcomed.</p>	<p>Noted.</p>
<p>10</p> <p>The inclusion of Policies 3.8.3 h) and i) are important to the Town of Cochrane. These policies relate to: determining the amount, type, location and shape of reserve lands; consultation with the adjacent municipality prior to determining the reserve requirement; as well as consultation with an IDP partner municipality prior to the disposal of reserve land within that IDP area. This is an area that has become increasingly important as the Town addresses the need for open space through the facilitation of urban redevelopment in 'rural' developed areas within our boundary. Although this is already included in Policy 2.9.2.1 of the IDP, the Town requests the deferral of reserve land within proximity of urban centres be the standard unless dedication of land is necessary for the developing community. In this context, the Town requests cash-in-lieu of reserve land be taken only when necessary and where there is no other alternative. This helps ensure potential urban development of these lands has a possibility of providing necessary school and park sites in the future.</p>	<p>As the IDP sits above the proposed MDP in the policy hierarchy, Rocky View County does not see a need to replicate an existing policy. Such MR matters will be addressed at subdivision stage.</p> <p>The Town still requests that this policy be included within the MDP. This is a very important issue for the Town as we are currently facing issues in relation to these types of situations. When urban redevelopment occurs we need to be certain that deferred MR is available to plan for a complete community or that MR has been thoughtfully and necessarily dedicated during the initial subdivision and that it has not previously been accepted as cash in lieu. Should strong policy not be in place there will be no guidance available at the time of subdivision to address these matters.</p>
<p>11</p> <p>Policy 3.8.4 a) describes the circumstances the County would request either the dedication of Environmental Reserve or the provision of an Environmental Reserve Easement. Understanding the restrictions in Section 663 of the MGA, why would the subdivision of commercial lands or agricultural parcels over 12 hectares be automatically excluded from providing ER should there be a significant environmental feature present?</p>	<p>The section referenced by the Town does not say the County would not take Environmental Reserve on commercial lands.</p>

<p>12</p> <p>The "Open Land" concept is interesting, and the Town is curious about Policy 2.3.1 I and the dedication of excess open land and allowance for density bonusing. Considering uses that are typically required for a development are included under the open land definition, such as parks, recreation, public utility lots, MR dedication, stormwater and wastewater treatment areas, institutional uses and flood fringe areas, how difficult will achieving density bonusing be and what will ASPs include as the desired amount?</p>	<p>These concerns will be addressed at the ASP stage of development. The draft new Springbank ASP provides an example of how this will be incorporated.</p>
<p>13</p> <p>There is a discrepancy between Policies 3.5.3 b) and 3.6.3 b) related to wastewater treatment systems. Policy 3.5.3 b) states wastewater treatment systems should not exceed the land's carrying capacity, and 3.6.3 b) states wastewater treatment systems shall not exceed the land's carrying capacity, with the later being the Town's wording preference.</p>	<p>Rocky View County has revised this text to reflect the Town's preferred wording consistently.</p>
<p>14</p> <p>While the Town of Cochrane understands the County's desire to grow and also expand its non-residential tax base, the Town feels the MDP is being considered for adoption prematurely before the adoption of the Regional Growth Plan. The draft MDP promotes partnerships and working in a spirit of collaboration with regional partners as one of its Guiding Principles. As such we respectfully request the adoption of the draft MDP not proceed until the regional Growth Plan is completed and there is ensured consistency between the two plans.</p>	<p>Rocky View County respectfully disagrees with the Town's position on approval of the proposed MDP under the Interim Growth Plan. The Town of Cochrane supported adoption of the Okotoks MDP, and a number of MDPs and ASPs have gone before the CMRB over the past year. It is the County's perspective that this is what the Interim Growth Plan and IREF were designed for, and no transition period was enacted in the regulations or since by the Board. Although Cochrane did not challenge the approval of the Okotoks MDP as the CMRB, the messaging provided was the same as what was included in this response. The Town continues to stand by the statement made as we feel that moving forward at this time to identify growth areas and employment lands is against the principles and spirit of regional collaboration that we are attempting to achieve through the Regional Growth Board.</p>

TOWN OF COCHRANE

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 Cochrane, AB T4C 2K8
 P: 403-851-2500 F: 403-932-6032
www.cochrane.ca



Rocky View County
 262075 Rocky View Point
 Rocky View County, AB T4A 0X2
 Attn: Dominic Kazmierczak

November 27, 2020

RE: Rocky View County Draft Municipal Development Plan Circulation

Dear Mr. Kazmierczak,

Thank you for the opportunity to review and provide comments on Rocky View County's Draft Municipal Development Plan. Administration has reviewed the draft document and has the following comments.

Cochrane's Community Vision

An important guiding document for the Town of Cochrane is the Cochrane Community Vision. Specific to this draft MDP the Cochrane Community Vision speaks to the importance of open spaces, natural areas and stewardship protecting the landscape within our town and beyond. The Town recognizes the importance of connected and accessible networks of natural areas and protected waterways not only within the town but through connections to the surrounding areas as well. The Community Vision aspires for green corridors that protect and preserve these important features and areas within the town and beyond. The Big Hill Creek, Glenbow Ranch Provincial Park, Jumping Pound Creek and the Bow River are all identified as these green corridor areas and as these features all extend well beyond our boundaries we strongly welcome the inclusion of policies within the MDP that speak to regional recreational decision making and would like to ensure that such policies extend to regional coordination on the protection and preservation of these important natural land features as well.

The Cochrane Community Vision also includes mapping relating to the future boundaries of the town. Over the next 30 years growth is anticipated to take place within the existing Town boundaries, however beyond 30 years the Town may need to begin looking to add additional land to support future commercial, light industrial, residential and open space needs. In order to begin planning for this future growth the Town has identified future land needs based on natural extensions of the community. The areas identified at this time include lands west, south and to the northeast of the current town boundaries. These areas identified for future growth of the town do not align with the areas for future growth that are being identified in the County's draft MDP, that being directly north and east of the Town of Cochrane. This creates issues for future regional servicing, collaboration on regional recreation and protection of natural areas.

Finally, one additional component of the Cochrane Community Vision is the rural character areas and key gateways into Cochrane and the region. Cochrane has a unique identity with rural character and the gateways into our community are important to maintain this identity and significance within the region. These gateways are identified as Highway 22 north and south of the Town as well as Highway 1A east and

west of the town. An important piece of the Cochrane Community Vision is that “The Town will collaborate with our neighbours to ensure development within this area reinforces the rural character of these lands.” The lands to the north and east are identified as future residential growth areas in the County’s draft MDP, which has the potential to affect the rural character and identity of the area and the gateways surrounding the Town of Cochrane. The Town asks that these gateways receive more attention and consideration as they are very significant to the Town, Rocky View County and identity of the region.

Intermunicipal Engagement

The MDP Project Stages state that Stage 4 of Drafting the MDP conducted in the Winter – Spring of 2020 included the opportunity for neighbouring municipalities and regional partners to review and comment on the draft MDP. We do not seem to have record of this occurring. Also, other phases of engagement were detailed on the project website, we are wondering about the feedback received regionally for this plan. If so, is this something that can be shared?

Vision and Guiding Principles

The Town of Cochrane understands and appreciates the Vision and Guiding Principles outlined in the draft Plan, particularly Guiding Principle 6 – Partnerships. The Town values our relationship with Rocky View County and looks forward to working together collaboratively to find mutually beneficial solutions to planning and development challenges as stated in the Plan.

Priority Growth Areas

The draft MDP includes a number of proposed residential and employment growth areas. It is understood a development suitability analysis, utilizing factors such as access to existing transportation infrastructure and servicing, was used to identify the proposed growth areas. This has resulted in the Primary Residential priority growth areas being located primarily west of the City of Calgary, including the northern and eastern boundaries of the Town of Cochrane, and the proposed Employment Areas being located on the east side of the City of Calgary. Since the adoption of the current County MDP in 2013 roughly 5,000 new residents have moved to Rocky View County. The majority of these residents located in the hamlets of Langdon and Conrich, with Langdon being in the top two residential population growth areas in the County since 1996. Section 2.5 *Hamlet Development* states hamlets are home to the majority of County residents and should be the priority for residential development over the next 20 years. Should this be the case, why does the Primary Residential Priority Growth Area expand well beyond the hamlet boundaries west of the City of Calgary?

Specifically, Cochrane North/Cochrane Lake is identified as a Small Hamlet and is located in the Primary Residential Priority Growth Area, yet Section 2.5.2 Small Hamlets states that “The County will continue to maintain existing levels of service for these rural communities, ensuring sustained quality of life for residents. Due to their more isolated location, and the availability of more sustainable development locations across the County, the County may not prioritize infrastructure and servicing upgrades in Small Hamlets.” Additionally, Policy 2.5.2 a) states - “New Development should occur within the existing hamlet boundary as opposed to expanding boundaries”. The Cochrane North ASP only identifies roughly 2 quarter sections as hamlet development, yet the priority residential growth boundary in the draft Plan includes a significantly larger area. This illustrates an inconsistency with the policy direction noted above, as well as inconsistencies between the two plans.

Growth Impact Considerations

1. The Rocky View County / Town of Cochrane IDP states that all residential development within the IDP area is to take into account urban overlay principles. The Town recommends this policy be

reflected in the MDP for areas proposed for residential development adjacent to urban centres. This will help ensure future orderly urban redevelopment where applicable.

2. Many policy sections throughout the proposed Plan identify what is to be included in future Area Structure Plans, as well as the requirements that need to be addressed before further development will be approved. Some examples include:
 - Section 2.3.1 h) identifies items to be incorporated into new ASPs within the residential priority growth areas;
 - Section 2.3.2 b) speaks to considerations to be given when proposing larger scale Country Residential Development within the priority residential growth area;
 - Section 2.5.1 c) identifies items to be addressed in an ASP or ARP for a Hamlet Growth Area.

These sections speak to considering the impacts on County or existing infrastructure. The Town requests that these policy areas also specifically include potential impacts to municipalities in close proximity that would expectedly serve these growth areas in terms of transportation impacts, recreational impacts, school need impacts, servicing impacts, etc. Additionally, the Town requests that the Hamlet Growth Areas section include policies for the provision of school sites to support the school needs in these priority residential growth areas.

3. Policy 2.3.1 f) states that “Primary Residential Areas should receive County services identified in the applicable area structure plans, conceptual schemes or County bylaws.” Assuming these services are necessary to support these proposed priority growth areas, this should become a “shall” statement to ensure the necessary servicing is provided to facilitate the proposed development.
4. Section 2.3.1 *Primary Residential Areas* speaks to areas where residential development and ancillary commercial and industrial development will be the predominant land uses. However, there are no policies included in that section that describe or guide the nature and scale of the proposed commercial or industrial development. Further, in Section 2.4.2 Neighbourhood Servicing Commercial within the Employment Area Section of the MDP, more information is provided regarding what these land uses should achieve, including providing social and community meeting places, enabling employment opportunities, and offering goods and services to the local area. Policies in 2.4.1 of the Employment Area section do not seem to align with locating these commercial and industrial uses within the Primary Residential Area. These policies prioritize commercial and industrial uses being located in the Employment Area to minimize land use conflicts with non-commercial and industrial uses and ensure proximity to appropriate servicing and infrastructure (including the transportation network). The Town would like to better understand the type and scale of the ancillary commercial and industrial uses that would be contemplated within the Primary Residential Area and would recommend policies for these uses be included in that section of the MDP.

Partnership Related Policies

The Town appreciates the inclusion of policies that promote partnerships with different levels of government and neighbouring municipalities. Particularly:

- Policy 3.2.1 a) and b), which speak to partnerships with the Province, neighbouring municipalities and developers to coordinate on regional transportation corridors and expansion of transportation infrastructure;
- Policy 3.3.1 e) regarding cooperation between municipalities relating to aggregate activities and coordination on haul routes and mitigation of impacts on adjacent land uses;

- Objectives under section 3.8 - specifically "Rocky View County partners and collaborates with neighbouring municipalities and other organizations in the development, use and maintenance of recreation facilities, parks, pathways and trails";
- Policy 3.8.5 e) "Collaborate with neighbouring municipalities for regional recreation decision making"; and
- The inclusion of Section 3.9.

Partnerships working to ensure avoidance of duplicating services and the costs associated with that are supported and welcomed.

Reserve Lands

The inclusion of Policies 3.8.3 h) and i) are important to the Town of Cochrane. These policies relate to: determining the amount, type, location and shape of reserve lands; consultation with the adjacent municipality prior to determining the reserve requirement; as well as consultation with an IDP partner municipality prior to the disposal of reserve land within that IDP area. This is an area that has become increasingly important as the Town addresses the need for open space through the facilitation of urban redevelopment in 'rural' developed areas within our boundary. Although this is already included in Policy 2.9.2.1 of the IDP, the Town requests the deferral of reserve land within proximity of urban centres be the standard unless dedication of land is necessary for the developing community. In this context, the Town requests cash-in-lieu of reserve land be taken only when necessary and where there is no other alternative. This helps ensure potential urban development of these lands has a possibility of providing necessary school and park sites in the future.

Policy 3.8.4 a) describes the circumstances the County would request either the dedication of Environmental Reserve or the provision of an Environmental Reserve Easement. Understanding the restrictions in Section 663 of the MGA, why would the subdivision of commercial lands or agricultural parcels over 12 hectares be automatically excluded from providing ER should there be a significant environmental feature present?

Open Land

The "Open Land" concept is interesting, and the Town is curious about Policy 2.3.1 I and the dedication of excess open land and allowance for density bonusing. Considering uses that are typically required for a development are included under the open land definition, such as parks, recreation, public utility lots, MR dedication, stormwater and wastewater treatment areas, institutional uses and flood fringe areas, how difficult will achieving density bonusing be and what will ASPs include as the desired amount?

Wastewater Treatment

There is a discrepancy between Policies 3.5.3 b) and 3.6.3 b) related to wastewater treatment systems. Policy 3.5.3 b) states wastewater treatment systems should not exceed the land's carrying capacity, and 3.6.3 b) states wastewater treatment systems shall not exceed the land's carrying capacity, with the later being the Town's wording preference.

MDP Adoption Timing

The Town of Cochrane recognizes both the Town of Cochrane and Rocky View County are members of the Calgary Metropolitan Region Board and understand that the final Growth Plan is required to be completed by March 1st, 2021. The intent of the Growth Plan is to arrive at regionally agreed upon areas for growth of different land use types. The draft MDP establishes its own set of growth areas arrived at independently

and includes Implementation Actions in Section 4.2 that amend, expand or draft new Area Structure Plans to facilitate the development of these County appointed growth areas.

While the Town of Cochrane understands the County's desire to grow and also expand its non-residential tax base, the Town feels the MDP is being considered for adoption prematurely before the adoption of the Regional Growth Plan. The draft MDP promotes partnerships and working in a spirit of collaboration with regional partners as one of its Guiding Principles. As such we respectfully request the adoption of the draft MDP not proceed until the regional Growth Plan is completed and there is ensured consistency between the two plans.

Thank you again for allowing the Town to review and comment on your draft MDP. We appreciate the opportunity and look forward to further discussion.

Sincerely,



Riley Welden, RPP
Acting General Manager, Development & Community Services



November 19, 2020

Sent via email: dkazmierczak@rockyview.ca

Rocky View County
911 – 32 Avenue NE
Calgary, AB
T2E 6X6

Attention: Dominic Kazmierczak

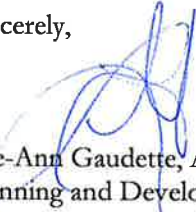
Dear Mr. Kazmierczak:

Re: Rocky View County Draft Municipal Development Plan

Thank you for your email dated October 21, 2020 with respect to the above noted matter. The email and material were circulated to Planning and Development Services as well as the Operational Services.

There were no comments on this circulation from Planning and Development Services nor Operational Services. Thank you for your consideration to include us in your referral agencies.

Sincerely,



Lee-Ann Gaudette, Administrative Assistant
Planning and Development Services
/lg

T 403.335.3311 1.877.264.9754 F 403.335.9207
1408 - Twp Rd 320 Postal Bag 100 Didsbury, AB, Canada T0M 0W0
www.mountainviewcounty.com

Building Rural Better

Dominic Kazmierczak

From: Merel Jarvis <merelj@crossfieldalberta.com>
Sent: November 3, 2020 11:11 AM
To: Dominic Kazmierczak
Subject: [EXTERNAL] - FW: Rocky View County MDP Review
Attachments: RVC_MDP-Draft.pdf

Do not open links or attachments unless sender and content are known.

Good morning Dominic,

Thank you for providing the Town of Crossfield the opportunity to review the RVC MDP draft, we advise that the town has no items of concern.

Take care,

Merel

Merel Jarvis | Development & Community Standards

Town of Crossfield | www.crossfieldalberta.com
PH: (403) 946-5565, extension 223 | Fax: (403) 946-4523
Office: [1005 Ross Street, Crossfield, AB T0M 0S0](#)
Mailing: PO Box 500, Crossfield, AB T0M 0S0



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From: Lindsey Nash <lindseyn@crossfieldalberta.com>
Sent: October 21, 2020 4:25 PM
To: Merel Jarvis <merelj@crossfieldalberta.com>
Cc: Ken Bosman <kenb@crossfieldalberta.com>; Mustafa Hashimi <mustafah@crossfieldalberta.com>
Subject: FW: Rocky View County MDP Review

From: DKazmierczak@rockyview.ca <DKazmierczak@rockyview.ca>
Sent: October 21, 2020 4:19 PM
To: DKazmierczak@rockyview.ca
Subject: Rocky View County MDP Review

Rocky View County Draft Municipal Development Plan

Please find attached a draft of Rocky View County's new Municipal Development Plan for your review and comment.

For further details on the MDP review process and next steps, please refer to the project webpage at:

www.rockyview.ca/MDP

County Administration is aiming to present the final draft MDP to Council before the end of the year and would therefore request that comments are received by **20 November, 2020**.

Thanks,

DOMINIC KAZMIERCZAK

Supervisor Planning (Policy) | Planning Services

ROCKY VIEW COUNTY

262075 Rocky View Point | Rocky View County | AB | T4A 0X2

Phone: 403-520-6291

DKazmierczak@rockyview.ca | www.rockyview.ca

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Dominic Kazmierczak

From: Diane Bodie <diane.bodie@wheatlandcounty.ca>
Sent: November 19, 2020 11:03 AM
To: Dominic Kazmierczak
Subject: [EXTERNAL] - RE: Rocky View County MDP Review

Do not open links or attachments unless sender and content are known.

Good Morning,

Wheatland County has no comments regarding the MDP.

Sincerely,

Diane Bodie

Administrative Assistant to Community and Development Services,
Wheatland County



242006 Range Road 243
HWY 1 RR 1, Strathmore AB, T1P 1J6

Phone: 403-361-2024

www.wheatlandcounty.ca



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From: DKazmierczak@rockyview.ca <DKazmierczak@rockyview.ca>
Sent: October 21, 2020 4:19 PM
To: DKazmierczak@rockyview.ca
Subject: Rocky View County MDP Review

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Rocky View County Draft Municipal Development Plan

Please find attached a draft of Rocky View County's new Municipal Development Plan for your review and comment.

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www.rockyview.ca/MDP

County Administration is aiming to present the final draft MDP to Council before the end of the year and would therefore request that comments are received by **20 November, 2020**.

Thanks,

DOMINIC KAZMIERCZAK

Supervisor Planning (Policy) | Planning Services

ROCKY VIEW COUNTY

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Feb 3, 2021

To Rocky View County Council and Municipal Development Planners

CCD: Mike Murray, ERWP Chair

Re: The Elbow River alluvial aquifer, Flood areas, Groundwater and Riparian areas

In your draft MDP, under section 3.5.2, 'Water', we are pleased to see a reference to using watershed management plans as guiding documents and planning tools. One of the critical management recommendations in the Elbow River Basin Watershed Management Plan is for the protection of alluvial aquifer. The Elbow River Basin Management Plan, <https://erwp.org/index.php/water-management/our-watershed-management-plan>, which was signed by RVC in 2008 (MD of Rocky View) includes these recommendations: protecting the Elbow River's natural functions, limiting land-use on the alluvial aquifer, and implementing low impact development practices.

Alluvial Aquifer

The alluvial aquifer is an area within the Elbow watershed that is highly sensitive to ground water contamination. The alluvial aquifer is essentially the part of the Elbow River which contains relatively shallow underground water. The water in the alluvial aquifer, has or potentially could become surface water with changing river flows. As the alluvial aquifer is very porous and directly connected to the Elbow River, this area is more sensitive to water quality issues. For example, any products that are accidentally spilled on the land, such as chemicals, pesticides or waste can enter the aquifer and the river very quickly. For your reference, the [shared folder](#) contains some data on the Elbow alluvial aquifer.

Flooding and Flood Mapping

Flooding is a natural part of the Elbow River system and important for recharging the alluvial aquifer, improving riparian function through the deposition of sediment, flushing of sediments and plant material from the river channel, creating new channels and undercut banks, and for contributing large woody debris to the river for fish habitat. However, when infrastructure is in the flood hazard areas, flooding can have a devastating effect on people and their infrastructure. Based on the most current maps in the Government of Alberta Flood Hazard Study, the alluvial aquifer and the Elbow flood hazard areas have significant overlap.

Groundwater

Groundwater is contained in the Elbow River's alluvial aquifer, an area that extends up to 2 kilometres outward from the river and from 5-12 metres down. The amount of groundwaters stored in the aquifer depends on the amount of recharge (water gained through rain and snowmelt) and discharge (water released from the rock into the river or pumped out through wells). Ideally, recharge and discharge amounts balance out over the long term.

Here is a link to more info on the Elbow alluvial aquifer and groundwater <https://erwp.org/index.php/groundwater-and-our-alluvial-aquifer>

Riparian areas/Green Zones (including wetlands)

It is well known in our area of work that riparian areas are of high ecosystem value. The healthier the riparian areas are, the healthier the ecosystem is. In planning circles, riparian areas are sometimes called 'green zones'. Those areas of land that are associated with water bodies such as rivers and wetlands are highly sensitive to changes on the landscape. In the Elbow watershed, the alluvial aquifer 'below' are the 'riparian areas' above. More (general) information on Riparian Areas can be found here.

<http://www.erwp.org/index.php/riparian-and-wetlands-areas>

Before scientists really understood the connection between rivers and aquifers, communities were built very close to the river with little concern for groundwater. A number of populated areas – including Bragg Creek, Redwood Meadows, Elbow Valley, parts of Springbank and Calgary – sit in the Elbow River aquifer. **Now that we know a bit more about the watershed, we can apply the benefits of proactive risk management to water quality and water quantity by approving a Municipal Development Plan and future planning documents that implement watershed management practices including:**

Category 1: Land Use and Stewardship

1. Manage water source areas to maintain or improve water quality in the Elbow River and its tributaries.
2. Manage riparian areas and wetlands to maintain or improve water quality.
3. Limit new development on the alluvial aquifer to those that improve water quality in the central urban and central rural reaches and those that maintain or improve water quality in the upper reach.
4. Modify existing developments on or within the alluvial aquifer to ensure water quality objectives are met (e.g. improvements to wastewater and stormwater systems).
5. No new direct stormwater discharge to the river. (Elbow River Basin Watershed Management Plan)

In conclusion; we recommend, whenever possible, to avoid new development in the alluvial aquifer and to include a map layer of the alluvial aquifer in future planning documents. Any potential development on the alluvial aquifer may create water quality risks, human safety and ecosystem risks.

If you would like to meet (virtually); we are happy to arrange. Again, thank you for the opportunity to provide input, please don't hesitate to contact me with any questions.

To find more out about the ERWP, please see our website www.erwp.org

Respectfully,



Flora Giesbrecht, Watershed Coordinator
Elbow River Watershed Partnership

To: legislativeservices@rockyview.ca

Subject: **Bylaw C-8090-2020 Municipal Development Plan**

In reviewing the new Municipal Development Plan (MDP), the RVC's **direction is to promote higher density and more urban-like development.**

Whereas the priorities of Rocky View County residents include:

- to sustain the RVC's rural character
- to support and protect RVC's agricultural sector and agricultural soils
- to protect the County's natural environment and habitats, wetlands, riparian areas, open spaces, wildlife and wildlife corridors, and rural landscapes
- to ensure that growth is orderly and fiscally responsible

This draft MDP does not indicate to RVC residents that their opinions, values, visions, priorities or values have been considered. **Residents want RVC to MANAGE land development and growth.** This version of the MDP does not include strong guidance to do that. The weak guidance (and absence of guidance on some topics) will have the opposite effect.

This MDP should be beefed up to give stronger guidance in every section.

Vision and Guiding Principles 1.3

Instead of **supporting and preserving the County's rural character**, the MDP proposes that "*Rocky View County will build resilient communities and welcoming neighbourhoods **by promoting concentrated growth within designated development areas***".

As a rural municipality, RVC should NOT be promoting CONCENTRATED growth. Remove the word "CONCENTRATED".

Agriculture: RVC **should support the agricultural sector in the MDP** by including guiding principles to prevent the unnecessary fragmentation of agricultural lands by development; and to protect valuable agricultural soils.

Environment: RVC **should protect the environment by including in the MDP a guiding principle to preserve environmentally sensitive lands, natural habitats, wetlands, riparian areas, open spaces, wildlife and wildlife corridors.**

Policy 2.2 Growth Areas

"The Growth Concept Map (Figure 2) identifies the priority areas within the County for the continued growth and expansion of residential, commercial, and industrial land uses".

2.2.1 However, *"previously planned areas with existing ASPs ... have not been fully developed, they are able to accommodate additional growth over the next 20 years"*.

The MDP proposes new commercial/industrial growth areas even when the approved existing growth areas are not built out yet.

RVC's 2016 Residential Land Inventory concluded that there was sufficient undeveloped land in existing ASPs to provide 20 to 200 years of growth. This should be (more than) sufficient for the anticipated life of the MDP.

It would be more fiscally responsible to focus development where there is existing infrastructure. Therefore, this new MDP should NOT be adding more priority areas for growth and expansion.

Employment Areas: *“These areas primarily contain commercial and industrial land uses and serve as major areas of employment in the County. Development will continue in existing growth areas, with new growth added in suitable locations to fulfill market demand. Most large scale industrial and commercial development will be directed to these areas.”*

Figure 2: Growth Concept Map identifies most of Springbank and a large area around Hwy 1/Hwy 22 intersection as employment areas. While the latter may be developed as commercial and industrial land uses, most of Springbank is existing country residential and therefore would not be suitable for large-scale industrial and commercial development.

Please review and adjust the Employment Area shown on Figure 2 for Springbank – currently it is neither accurate nor compatible with the existing residential land use.

Also, what is the current extent in hectares (acres) in RVC is for the following land uses: business, commercial, industrial. This information should be added to the MDP as a benchmark for the plan's anticipated 20-year life.

Policy 2.3 Residential Development

The MDP proposal to “**support higher density residential development where appropriate**” is contrary to the many years of public feedback that supports maintaining the RVC's agricultural, rural and country residential character.

The MDP should include a policy or guiding principle on when/ where higher density is appropriate.

Residents' feedback also indicated that new residential developments need to have viable utility services.

The MDP should include policies or guiding principles that ensure that viable utility services will be identified and available, before or during the ASP stage.

Policy 2.3.1 Primary Residential Areas

“Primary Residential Areas comprise lands where residential development and ancillary commercial and industrial development will be the predominant land use.”

Industrial land uses are NOT “ancillary” to residential land uses – these uses are incompatible and require transitions or buffers between them.

The MDP should be amended accordingly.

From: [Dominic Kazmierczak](#)
To: [Steven Lancashire](#)
Subject: FW: [EXTERNAL] - Draft 4 Municipal Development Plan- December 2020
Date: February 8, 2021 10:08:37 AM

From: [REDACTED]
Sent: February 4, 2021 4:49 PM
To: PAA_Development <Development@rockyview.ca>
Subject: [EXTERNAL] - Draft 4 Municipal Development Plan- December 2020

Do not open links or attachments unless sender and content are known.

To whoever it may concern in the Planning Department.

I spent a short while reviewing the above plan this afternoon. It is an excellent document, well thought out, and should lead to very orderly development in Rocky View over the next 20 years or so. As a result, you should have very happy constituents and taxpayers, and Rocky View should continue to be an excellent place to live.

My name is Charlie Locke. My wife, Louise and I have ranched on roughly 5 sections of land in Rocky View for nearly 50 years, and my family has owned land here since the early 50's when we moved from Special Areas 2 north east of Hanna. We still own land there.

Our operation is mainly a cow calf outfit but we fatten our own calves and some of the neighbours, and sell some of our grain and hay. We have been doing this since we moved to the area in 1971.

I noted in draft 4 of the Municipal Development Plan, under the title Agricultural Policy, section 3.4.1 relating to Confined Feeding Operations (CFO's) that you removed the word "should" and replaced it with "shall". We are concerned then, even though our operation is very small in terms of CFO operations, that at some point someone from the County will ask that we stop feeding our calves.

The Development in Bearspaw hit our boundary 40 years ago and stopped. But, we may be within the set back distance from Municipal Subdivisions required by the Counties policies relating to CFO's.

Our home farm is in the south 1/2 and n.w. 1/4 of section 24 26 3 w5. I can be reached after 6 a.m. and before 11 p.m at [REDACTED] should you have questions.

So, the bottom line is that I suggest that operations that existed before Rocky View's, or Alberta Government regulations were made, should be grandfathered. I strongly suggest that you either change the word "shall" to "should" as outlined above, or in the alternative add the word "new" before CFO's in Section 3.4.1 (page 33) of draft 4 of the proposed Municipal Development Plan.

Thanks; Charlie Locke

Policy 2.3.2 Country Residential Development

The **MDP Glossary** redefines **Country Residential Development** (pg 53) as: *'Residential communities in the County that typically include the following characteristics: primarily dispersed **low-density residential development, parcel sizes of 1 acre or larger**, rural character, designed with the landscape, and contain passive and active recreational, and cultural opportunities.'*

Existing 2-acre country residential developments were designed to be self-sustaining properties (i.e., without off-site water or wastewater servicing), with septic fields and private water supply (or well water). It is not possible for 1-acre parcels to be self-sustaining.

The MDP glossary entry for Country Residential Development should be amended to delete the reference to "1-acre" parcels or should be changed to "2-acre" parcels.

2.4.2 Neighbourhood Serving Commercial

"Commercial and light industrial development in appropriate locations contributes to the viability of Primary Residential Areas by providing social and community meeting places, enabling employment opportunities, and offering goods and services to the local area."

This statement is completely illogical - Primary Residential Areas do NOT need commercial and light industrial development – in fact in places like Springbank, it's the exact opposite. Planned commercial/industrial in Springbank is likely to drive RVC residents to live in quiet residential areas of Calgary. That's why commercial/industrial should be focused around Springbank airport, where residential development is not possible. Whereas Figure 2: Growth Concept Map identifies most of Springbank as an employment areas, most of that area should remain as residential.

The above mentioned quote from the MDP needs to be completely changed in the next draft.

Policy 2.5 Hamlet Development

"Rocky View's hamlets are home to the majority of the County's residents and provide services for the everyday needs."

This is NOT so and contradicts other information about the distribution of County's population.

The MDP should be changed to correct this misleading statement.

Also the MDP should emphasize that growth be directed to existing hamlets before there is a need to establish new hamlets.

Policy Section 3.1 Financial Sustainability

“For Rocky View County to be financially sustainable, development must pay for itself and be affordable over the long term. This reduces financial risk to County ratepayers and mitigates potential economic risks.”

Earlier versions of Policy 3.1.1(j) required that utility operational and life cycle costs be recovered from user fees. As with Policy 3.1.1(g), the MDP now only indicates that this “may” happen.

User fees for existing county-owned utilities do not cover their costs, but the MDP does not state how this situation will be changed to reduce the financial burden on RVC and the taxpayers in the future.

The MDP needs to clarify how this will be managed.

3.1.1 Financial Sustainability Policies

h) “The County will commit to continued assessment base diversification and should strive to achieve an Assessment Split Ratio of 65% residential and 35% business County-wide through careful consideration of development applications”

Has RVC’s targeted 65:35 ratio of residential to business development been met yet? What is the current ratio?

That should be included in the MDP, e.g., “at the time of preparing this new MDP (2021), the ratio of residential to business development is _____”?

Policy Section 3.2 Transportation / 3.2.1 Transportation Planning and Development

Re planning for impact from new growth (especially commercial/ industrial) on transportation routes, e.g., Hwy 1 west, Hwy 1A, Hwy 8 and Old Banff Coach Rd, these policies contain well-intentioned words but so far, lack of success. For example, RVC allowed Qualico to publish and distribute their Highway1/Old Banff Coach Road Conceptual Scheme showing Old Banff Coach Rd turned into a 4-lane highway. As you know, OBCR is provincial Hwy 563, and RVC had failed to consult with Alberta Transportation, which did not approve their Hwy being changed.

The MDP should contain stronger guidance regarding consultation between the various levels of government regarding the impact of new development on transportation routes, PRIOR to ASPs and CSs being brought forward.

Policy Section 3.4 Agriculture

“The agriculture sector remains an important component of the county’s economy.”

However, the virtual elimination of policies dealing with existing agricultural operations in the new MDP versus the existing County Plan would seem to indicate otherwise. By contrast, residents consistently express a high priority for maintaining the County’s agricultural base.

The MDP should include strong guiding policies in support of the agricultural sector.

Policy Section 3.5 Environment

As with 3.4, the MDP should increase the number and extent of policies to guide the protection of the environment and encourage conservation. The new MDP has less guidance than the existing County Plan.

Policy Section 3.6 Utility Services

The MDP has weak policy guidance on these critical issues. Instead, it defers to the County Servicing Standards.

As the RVC's top statutory planning document, the MDP should provide strong guidance on the level of utility servicing required for different types of development. Then the County Servicing Standards will provide the details on how that will be achieved.

Meanwhile the MDP should prescribe what is required in ASPs (and Conceptual Schemes) so that developments are not brought forward to RVC Council before they include verifiable details of how utility servicing would be provided.

This section of the MDP should be rewritten to clarify and strengthen the guidance on Utility Services.

Policy Section 3.6.4 i) "CSMI" – need to define/explain this term.

Policy Section 3.8.2 Park and Open Space Design and Standards

b) Connect wildlife corridors, waterbodies, environmentally significant areas through protected parks and open spaces.

Wildlife corridors are already and will be negatively impacted by higher density development proposed. Is there a plan for retaining and protecting wildlife corridors and mitigating human/animal interaction in these new growth areas, besides extirpating the wildlife?

The MDP should more strongly guide the preservation of wildlife corridors as well as the conservation of wildlife habitat.

Glossary "Gore strip" pg 55 – need to add a definition or explanation.

Comments from:

Ena Spalding, 178 Artists View Way T3Z 3N1

Date: February 2021

Rocky View County Municipal Development Plan Update

Gloria Wilkinson Feedback for inclusion at the Public Hearing

The comments come in the order in which the document is written.

Principles

3. “--- promoting concentrated growth ---“. This is WRONG. Should read **promote to growth to occur within designated development areas.**

2.3 Residential Development

2.3.1 includes industrial. WRONG. Industrial needs to be separated out and shown on it’s own map

f) “ --- should receive County services ---“. REMOVE

h) i) Change to **shall** – on basis of developable land: add **“and the ability to provide centralized water and wastewater services.**

2.3.2

e) iii) Where residential is not being achieved --- reduce the overall area dedicated to ---

Based on the intent of retaining this wording, I note that the desire for Springbank lands ended in 2000 (your document) so does the question remain the intent of the MDP or the intent in the South Springbank ASP adding thousands of acres. There is a mis-match in the documents.

3.1.1 Financial Stability

a) --- to areas of existing infrastructure. REMOVE where feasible because the iver basins have been closed since 2006.

g) Change should to SHALL

3.5.2

a) ADD “and surface water”

3.5.5

Riparian areas should be ADDED, as those are the areas to protect groundwater.

3.6.2

b) why use the word shall --- transfer to the County? With widely separated water suppliers, why would any taxpayer want to pay for servicing elsewhere?

c) Change the wording to “--- meets CURRENT standards (I know some water coops do not meet current AENP standards) and is in EXCELLENT operating order (many suppliers have no capital plan for updates so are not viable)”.

January 27, 2021

Steven Lancashire

From: Hazel George [REDACTED]
Sent: January 28, 2021 7:49 AM
To: Dominic Kazmierczak
Subject: [EXTERNAL] - Municipal Development Plan

Do not open links or attachments unless sender and content are known.

Good morning Dominic, I had a quick read through the MDP draft and would suggest the following edits:

Page Five.....*Large scale ranching, logging, and oil and gas extraction are major industries in western Rocky View County while ranching, equestrian livestock operations, conventional agricultural operations, and diversified agriculture, including greenhouses and nurseries, are prominent in eastern areas of the County. Commercial activities also occur along major highways that traverse the County, including the Trans-Canada Highway (Highway 1), and Queen Elizabeth II Highway (Highway 2). Large scale commercial and industrial operations are also located in the County adjacent to the City of Calgary, the Calgary International.....etc..*

I would respectfully point out to you that in Division 6, in the eastern part of RVC, we are over run with shale gas development from the location of the wells, to the pipelines and the compressor stations that support them.. Could you possibly reword this sentence to reflect the ongoing activity in a large section of eastern RVC?

Page 32 *Consider successional transitions of aggregate extraction sites to other industrial and complementary uses or **reclaim to nature preserve, park or return to agriculture use in appropriate areas.** (e.g. ~~waste transfer or processing facilities~~).*

Regards Hazel George.

Date: January 30, 2021

File : Rocky View County Master Development Plan,
Public Input; Bylaw C-8090-2020 (Deadline, February 3, 2021)

Subject: Agricultural Land Base Fragmentation:
Addressing the Loophole in the Agricultural Master Plan, RVC

To: Members of Council and Agricultural Services Board

Rocky View County has taken great pride, and rightfully so, in the Agricultural Master Plan which predated the Rocky View County Plan 2013 by several years but formed guiding principles in the stewardship of the extensive agricultural land base and water resources within the County. Given the fact that the County Plan 2013 (which was based on over a year of extensive public input) is undergoing revision and rewrite, it makes sense that the policies underpinning preservation of agricultural land and concomitant water resources also be considered in depth. This would ensure that land owners are treated equally, and the land base is left available for comprehensive and well planned developments such as the village of Harmony among many other residential-commercial developments and above all, that there will be an adequate return to County taxpayers to ensure quality infrastructure for roads, water and wastewater servicing, schools and other necessary facilities. Under the present policies, there is no requirement for this “new and distinct” type of agricultural subdivision to contribute through the Master Rate Levy Bylaw.

The glaring policy loophole within the proposed Ag Land Policy Development is clearly the lack of follow-up accountability for “New and Distinct Agricultural Land Use Subdivision”. As has been noted, it can place the landowner/developer in a position of dishonest intentions, primarily because it is such an enticing loophole as it essentially supercedes Area Structure Plan policies and circumvents guiding policies for subdivision into a fragmented land base.

The Agricultural Services Board is very aware of this lack of follow-up policy and hence, accountability to the County taxpayers. They often, if not always comment that “This new use, while meeting policy, can readily be accommodated under the present land use zoning”. No business plan for this “new and distinct

agricultural use” is required and if the addition of the new subdivided parcel is either uneconomic or simply part of a mixed use agricultural operation (which most viable agricultural ventures generally are). Essentially, the subdivisions are created for resale, under the new title.

Estate planning is an important part of any agricultural operation, held within multi-generational farm families. This is why Farmstead Separation and First Parcel Out from an unsubdivided agricultural quarter section are time honoured policies which are meant to address family estate planning as well as agricultural land base separation. There are, however, economies of scale and investment to ensure adequate cash flow for ag subdivision proposals in order to operate successfully. Adding a few livestock to a family horse or cow operation does not ensure a business venture. Above all, smaller and smaller parcels require adequate roads and all the associated infrastructure that families require and that the present taxpayers will be forced to carry. Development should and must pay for development and not the present taxpayers. A small acreage owner (greater than 7 acres) who proposes subdivision of his land is required to contribute their share of future infrastructure through transportation offsite levies and so on. This is not the case for fragmentation of “agricultural” parcels which does not seem fair or reasonable.

At the very least, and in order to support the work of the Agricultural Services Board’s honest recommendations, there should be a requirement for a real business plan for Agricultural Land Fragmentation through the “new and distinct” agricultural land use subdivision policy. There must, at the very least, be follow-up accountability by Rocky View County Administration so that the intent of this policy is honoured and not abused.

Respectfully,

Liz Breakey,
Landowner & Past Councillor,
Division 1, Rocky View County

Rockyview County Municipal Development Plan

Comments by Peter Tucker

[REDACTED]

[REDACTED]

General

Overall the plan seems thorough and the direction of the policies takes us toward responsible management of the anticipated growth. I like the concept of specific growth areas as it provides some assurance that the essential character of the county remains true to its heritage, while allowing for required development.

In the section below, I speak more specifically to some of the language used in the policies. I've identified a series of areas where I believe the language is weaker than it needs to be. Aside from the changes from "shall" to "should" in some of these areas, I have a concern around the use of ambiguous words such as "support" and "encourage", as there is little direction for the degree of said support or encouragement. For example, encouraging the infilling of existing employment areas (2.4.1 c) could be as little as county administrators offering their supportive thoughts to a proposed developer. Contrast these to language such as "provide", "ensure" and "require" that is used in other parts of the plan.

Specific

Pg 15, Ecological Features and Waterbodies: change "should" to "shall".

Pg 15: There are actually three Provincial parks in RVC. Bragg Creek PP has been omitted.

Pg 18, Paragraphs H&I: "change "should" to "shall" as these are all critical aspects of an ASP

Pg 19, 2.3.3, last sentence: Needs to be strengthened by changing "should" to "shall".

Pg 22, H: If you are going to allow industrial development outside employment areas, then significant guidelines are a must. "Change "should" to "shall".

Pg 26, 2.6.1: In my opinion, there always needs to be both operating and master site development plans. Change "should" to "shall"

Pg 34, Environment, 2nd Paragraph: Saying that environmental features should be studied is too weak. If environment is indeed a priority as indicated in the guiding principles, then the language needs to reflect this.

Pg 34, 3.5.1 a: Change "may" to "should". In my opinion, any proposed development near sensitive land needs to have an impact statement prepared or draw on an existing one created within the previous 5 years.

Pg 48, 4.2 a: Consider reporting on a semi-annual basis. Things change quickly and a lot can go off the rails in a year. This is a key piece of the oversight role.

Appendix C: Add to Conceptual Scheme Requirements: A description of how emergency measures are managed if county or provincial emergency services are too distant.

Steven Lancashire

From: Theresa Cochran
Sent: February 5, 2021 3:08 AM
To: Dominic Kazmierczak
Subject: FW: [EXTERNAL] - Feedback on the Rocky View County Municipal Development Plan Bylaw C-8090-2020 - December 2020 Draft 4

From: Division 1, Mark Kamachi <MKamachi@rockyview.ca>
Sent: February 4, 2021 9:38 AM
To: Al Hoggan <AHoggan@rockyview.ca>; Division 7, Daniel Henn <DHenn@rockyview.ca>; Theresa Cochran <TCochran@rockyview.ca>
Subject: Fwd: [EXTERNAL] - Feedback on the Rocky View County Municipal Development Plan Bylaw C-8090-2020 - December 2020 Draft 4

Good morning again,
Renee is the resident who is also heading up the call for RVC, Tsuut'ina, GBCTA and all other NGOs and government organization to make the trails and RVC area a wildlife corridor.
Cheers, mark.

Mark Kamachi, Councillor Division 1

C: 403 861 7806

E: MKamachi@rockyview.ca

Rocky View County

262075 Rocky View Point | Rocky View County | AB | T4A 0X2

Begin forwarded message:

From: Renee Delorme [REDACTED]
Date: February 3, 2021 at 10:01:06 PM MST
To: Legislative Services Shared <LegislativeServices@rockyview.ca>
Cc: "Division 1, Mark Kamachi" <MKamachi@rockyview.ca>
Subject: [EXTERNAL] - Feedback on the Rocky View County Municipal Development Plan Bylaw C-8090-2020 - December 2020 Draft 4

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February 3rd, 2021

Legislative Services

262075 Rocky View Point
 Rocky View County, AB, T4A 0X2
legislativeservices@rockyview.ca
 c.c. Councillor Mark Kamachi

Object: Feedback on the Rocky View County Municipal Development Plan Bylaw C-8090-2020 - December 2020 Draft 4

To: Rocky View County Planners

This letter addresses my concerns and recommendations regarding the Draft Municipal Development Plan (MDP) - December 2020.

The "should" need to be made "shall."

Many changes in the MPD appear to have been weakened, leaving it to the reader and the decision-makers to interpret what it means. Vague statements can and will lead to misinterpretation, confusion, conflict, and potentially disorderly developments. For example: the "should" need to be made "shall" with clear, measurable based on evidence that supports healthy man-made and natural environments.

MDP - Guiding Principles (p.4)

"Rocky View County will build resilient communities and welcoming neighbourhoods by promoting concentrated growth within designated development areas".

The above statement is vague and can be interpreted in various ways, leading to anything from the current status quo to full-on urbanization of a rural community. This statement has to be accompanied by principles, values and standards that will assist in assessing the benefits of proposed developments. It must include clear definitions, terminologies and policies to guide developers, residents, public servants, decision-makers and councillors.

MDP Glossary - "Country Residential Development" (P.53)

Revert back to a definition of Rural Country Residential to include a minimum of 2 acres lot. The minimum size to support self sustain properties without the need for off-site water and wastewater servicing. This is not possible for 1-acre parcels. Anything less than 2 acre lots will further erode the County's rural character.

MDP 2.5.1 - a, b, c - Hamlet Growth Area

Replace "should" with "will"... Adopted Area Structure Plans will guide developers. This provides ratepayer input in the development and density guidelines. RVC will reserve land in the same quarter section developed and be placed into environmental reserve in proportion to the density target.

MDP - Section 3.5.4 Land and Environment Stewardship

Include provisions to identify, inventory and map out wildlife migration routes. Also include provisions to monitor and track movement patterns in migration corridors that are connecting critical habitats within the County. Threatened animal and bird locations should be protected according to Federal guidelines.

Clear baseline and mapping of the natural environment and wildlife movements are critical to applying clear and effective development policies. It will also be the basis of credible monitoring and help identify mitigation strategies.

MDP - Section 3.9.2 Emergency Services

RVC must require Emergency Response Plans that include flooding, wildfire, and airborne (H2S) toxins for all hamlets and population centers with more than 100 people. Access and egress routes must be in place for each population center. These routes should be paid for by developers as part of hard infrastructure.

[REDACTED] The MDP's has a long life cycle and, for this reason, must be forward-looking. It needs to be relevant now and in the future. Its application has to serve the local population now, in five years and 20 years. It should not serve passing interests.

Renée Delorme

[REDACTED]

Bragg Creek, Alberta

TOL OK0

[REDACTED]

ROCKY VIEW FORWARD
COMMENTS ON THE PROPOSED MUNICIPAL DEVELOPMENT PLAN
January 2021

The following comments highlight Rocky View Forward's concerns with the Municipal Development Plan (MDP) that will be considered at the public hearing scheduled for February 16, 2021. The comments are organized in the same order as the MDP and focus on what we believe are major issues with the document as drafted.

Section 1.3 – Guiding Principles

- *Responsible Growth* – The MDP claims that growth should be concentrated in designated growth areas in a fiscally sustainable manner.
 - The MDP is adding significant growth areas for residential, commercial, and industrial development and has policies that will facilitate development outside of these expanded “priority growth areas”.
 - This is despite the MDP’s acknowledgement that already-approved ASPs have sufficient undeveloped land to absorb anticipated growth over the next 20 years.
 - How does the County reconcile these apparently conflicting elements? If growth should be concentrated in designated areas, why does the MDP facilitate development outside of those areas?
- *Community Development* – The MDP states that the County will build resilient communities by “promoting concentrated growth within designated development areas”.
 - There is a fundamental difference between “concentrating growth in designated areas” and “promoting concentrated growth” in those areas.
 - The former indicates a preference for growth to occur in approved areas. The latter suggests that resilient communities require high density (or concentrated) growth.
 - What is the rationale for the last-minute change that added “promoting concentrated growth” to this principle?
- *Agriculture* – The MDP is proposing a last-minute change to add traditional agricultural activities to this principle. Previously it had only referenced agricultural diversification.
 - It is comforting to see the acknowledgement of traditional agriculture.
 - However, since there are no corresponding changes proposed for any of the agricultural policies in the MDP, how will the expanded focus of this principle be realized?
 - What does the draft MDP do to stop the unnecessary fragmentation of agricultural parcels – something that is critical to support of traditional agriculture?
 - Most of Rocky View’s agricultural land is not in ASPs. As a result, the MDP is the only planning document that provides guidance for much of Rocky View’s agricultural land.
 - Given this, why has the draft MDP so severely reduced its agricultural focus?

- *Partnerships* – In the County Plan, partnerships had focused on improving the availability of services for residents. The MDP’s focus is solely on regional partnerships as a way to find solutions to planning and development challenges.
 - What is the rationale for this significant change in focus?

Section 1.4 – Rocky View County Context

- The MDP asserts that “directing new growth to appropriate locations will be an important component of creating a fiscally sustainable municipality in the long term”.
 - The MDP acknowledges the validity of the County’s 2016 Residential Land Inventory. That document concluded that there was sufficient undeveloped land in existing ASPs to provide 20 – 200+ years growth in those ASPs.
 - The MDP, however, goes on to propose substantial increases in approved growth areas beyond the already-approved ASPs.
 - If the MDP’s assertion is more than a motherhood statement, how will it combine these apparently contradictory elements to achieve the promised “fiscally sustainable” growth?

SECTION 2 – LAND USE POLICIES

Section 2.1 – Population & Housing Trends

- The MDP notes that the Calgary Metropolitan Region Board has forecast that Rocky View will grow by 17,576 residents (just over 6,500 new dwellings) between 2018 – 2040.
 - This projection works out to an average of just over 280 new houses built every year for the next 20 – 25 years. This assumes a faster rate of growth that the County has experienced over the last five years.
 - How does the MDP reconcile this apparently conflicting information?
 - Will the population projections used in the MDP be adjusted to reflect major structural changes that occurred after they were made? Specifically, the collapse of the oil and gas industry and the unavoidable post-Covid slowdown in the economy?

Section 2.2 – Growth Areas

- The MDP states that “the Growth Concept Map identifies the priority areas within the county for the continued growth and expansion of residential, commercial, and industrial land uses”.
- It then adds – “new development may occur outside of the identified priority growth areas”.
 - The Growth Concept Map significantly expands “priority growth areas” beyond what exists in already-approved ASPs.
 - The MDP goes on to note that “previously planned areas with existing ASPs ... have not been fully developed, they are able to accommodate additional growth over the next 20 years”.
 - Given this observation, what is the rationale for adding new priority growth areas, let alone facilitating development outside of these expanded areas?

- *Primary Residential Areas* – The MDP indicates that it is adding new residential growth areas to “provide a greater range of housing options to appeal to changing market preferences.”
 - The MDP does not provide any evidence to support that market preferences have actually changed.
 - The MDP also provides no rationale for why existing ASPs cannot be modified to increase the variety housing options available in them. This is being done in the Springbank ASP and could easily be done in the Bears paw ASP which is currently being revised.
 - How can adding new growth areas be consistent with fiscally sustainable and responsible growth when existing growth areas are far from built out?
 - Will it not simply spread development over a larger footprint when the MDP acknowledges that is a costly, inefficient approach?
- *Employment Areas* – The MDP is adding significant new commercial/industrial growth areas.
 - Expanding the commercial / industrial growth areas when the currently approved ones are far from built out seriously disadvantages landowners who have followed the County’s planning direction and located in the previously identified growth areas.
 - What is the rationale for penalizing those who have “played by the rules” in the past?

Section 2.3 – Residential Development

- The MDP states that it “support[s] higher density residential development where appropriate”.
 - This is inconsistent with public feedback which supported maintaining the County’s rural and country residential character.
 - There do not appear to be any policies that provide guidance on when and/or where higher density is appropriate.
 - Public feedback also indicated that future residential development needed to have viable servicing. There do not appear to be any policies that ensure this will happen.
- *Policy 2.3.1 – Primary Residential Areas*
 - The MDP introduces this section by stating that it deals with “lands where residential development and ancillary commercial and industrial development will be the primary land uses”.
 - Industrial land uses are never ancillary to residential land uses – they are incompatible and require significant transition buffers between them.
- *Policy 2.3.2 – Country Residential Development*
 - Policy 2.3.2 (b) indicates that it would be preferable to have a new ASP or concept scheme for new country residential developments greater than 10 acres outside of existing ASPs.
 - Why is this requirement no longer mandatory?

- Why do these not have to demonstrate substantial build out in already approved ASPs and an identifiable demand for development in the new location?
 - Policy 2.3.2(e)(iii) suggests reducing the amount of land identified for country residential development in existing ASPs if those areas are not being developed as quickly as expected.
 - What evidence exists to suggest that other alternatives, presumably higher density ones, are more appropriate? Given the slow build-out being experienced in Harmony, it is not clear that such evidence exists.
 - It should be necessary to demonstrate that it is the country residential housing option that is failing to meet expectations rather than just slower overall growth than anticipated.
 - This policy also appears to be inconsistent with public feedback that people like the rural atmosphere in Rocky View.
- Policy 2.3.3. – *Fragmented Country Residential Development*
 - The MDP's introduction to this section states that “further fragmented country residential development should be avoided, and a gradual transition should be pursued to a more orderly and efficient development pattern within fragmented country residential areas.”
 - The policy only deals with development within already fragmented quarter sections. It is not clear what, if any, policies stop fragmentation of quarter sections that are currently unfragmented.
 - Stopping further fragmentation should have higher priority than restricting additional fragmentation in quarter sections that are already fragmented.
 - The existing County Plan permits redesignation of parcels under 24.7 acres (10 hectares) in already fragmented quarter sections, with conditions. The new MDP permits redesignations only for parcels less than 9.9 acres (4 hectares).
 - How is this restriction consistent with “pursuing a more orderly and efficient development pattern” within already fragmented quarter sections?

Section 2.4 – Commercial & Industrial Development (Renamed to Employment Area Development)

- The County Plan differentiated between types of commercial/industrial development and had separate policies for regional business areas, highway business development areas, hamlet business areas, and industrial storage.
- The MDP combined these into “employment areas” and “neighbourhood serving commercial”.
 - Removing the constraints on the types of businesses appropriate in “highway business development areas” appears to be inconsistent with feedback that emphasized the importance of maintaining vistas in the County.
- Policy 2.4.1 (a) states that an employment area should have an ASP in place before development occurs. However, Policy 2.4.1(b) only requires large scale development to locate in employment areas “when feasible”.

- What is the point in having ASPs if large scale development can easily locate outside of them?
- Policy 2.4.1(c) encourages infilling of existing employment areas. Although this is a worthy objective, it is largely nullified by providing loose criteria in Policies 2.4.1(g) and (h) that will facilitate smaller commercial / industrial development outside of ASPs.
 - How can this be consistent with fiscally and environmentally responsible growth?

Section 2.5 – Hamlet Development

- This section starts with the statement that “Rocky View’s hamlets are home to the majority of the County’s residents”.
 - No evidence is provided to support this statement, which appears to contradict other available information about the distribution of Rocky View’s population.
- This section also asserts that “hamlets should be the priority for residential development over the next 20 years.”
 - Given that the MDP is proposing significantly expanded “priority growth areas” in addition to current and planned hamlets, how does the MDP prioritize growth in hamlets relative to growth in other “priority growth areas” and why is it proposing this preference?
- Balzac West and Glenbow are identified as hamlet growth areas. Neither of these currently exist.
 - How does prioritizing growth in new full-service hamlets rather than in already-existing hamlets fit with fiscally sustainable growth?
- The existing County Plan has population targets for hamlets. These were to ensure that hamlets retained their rural character in keeping with the overall objectives of RVC’s development plan.
 - How is the removal of the population targets consistent with feedback that people want to retain the rural character of the County?

SECTION 3 – COUNTY-WIDE POLICIES

Section 3.1 – Financial Sustainability

- The introduction to this section includes the following statement – “For Rocky View County to be financially sustainable, development must pay for itself and be affordable over the long term. This reduces financial risk to County ratepayers and mitigates potential economic risks.”
 - The MDP has many similar statements emphasizing the importance of financial sustainability; however, there appear to be very few policies that are actually designed to achieve this.
 - This has been further weakened by the MDP’s switch from “shall” to “should” in the wording of its policies.
- Earlier versions of Policy 3.1.1(g) required the county to ensure that full cost recovery was in place before development proposals were approved. The MDP now only indicates a preference for this to occur.

- Policy 3.1.1(h) acknowledges the County's commitment to move towards a 65% residential / 35% non-residential assessment split as a means of strengthening the County's financial sustainability.
 - The MDP provides no information on how this can be achieved alongside its proposals to significantly expand residential growth areas.
- Earlier versions of Policy 3.1.1(j) required that utility operational and life cycle costs be recovered from user fees. As with Policy 3.1.1(g), the MDP now only indicates that this "may" happen.
 - Given that user fees for the existing county-owned utilities do not cover their costs, it is not clear how the MDP proposes that this might be achieved in the future.
- The changes to this section leave its policies as aspirational. As a result, it is not clear how they will improve the financial sustainability of future development in the County.

Section 3.3 – Natural Resource Development

- It is not clear why this section has been moved from the Land Use section since the land uses remaining in that section also provide county-wide policies.
- The introduction to this section opens with a highly questionable statement. Natural resource development is not an "important contributor to the local economy". It is important to the regional economy; but the County receives minimal revenue from any natural resource development.
 - The only significant County revenue is the Community Aggregate Payment levy, which does not begin to cover the costs of damage to the roads caused by heavy gravel trucks.
- The introductory paragraph goes on to recognize that resource extraction requires "careful consideration for how extraction is planned and implemented".
 - The County Plan recognized the importance of this and mandated Administration to develop a stand-alone policy to govern aggregate operations in the County.
 - This Council killed that initiative two years ago and has taken no steps to replace it.
 - The MDP now proposes to remove much of the guidance the County Plan had provided as a stopgap before its anticipated aggregate resource plan was developed.
 - As a result, it is not clear how the MDP will ensure that the acknowledged "community concerns" and "significant impacts" from resource extraction are addressed.
- Policy 3.3.1(c) is backwards – instead of discouraging new residential development where future aggregate extraction might occur, future aggregate extraction should be discouraged in locations where its unavoidable off-site impacts might affect existing residential development.
 - There is no guidance for how these "future aggregate" locations might be determined. Given that the County has some of the most generous aggregate deposits in North America, this could potentially limit non-aggregate development in much of the County.

- Policy 3.3.1(f) continues to require Master Site Development Plans for aggregate extraction. However, it is not clear how effective this requirement will be. The County Plan had listed specific requirements for these MSDPs. Those have now all been eliminated and are no longer part of the MDP.
- Policy 3.3.1(g) encourages the location of complimentary industrial activity adjacent to aggregate operations.
 - The MDP provides no guidance on where it is appropriate to locate open pit gravel mines. Given this serious failing, how can it possibly conclude that it is appropriate to locate other industrial uses adjacent to these operations?
 - Since the MDP provides no restrictions on aggregate operations in residential ASPs, this policy opens the door for additional industrial activity in residential communities simply because there is a gravel pit nearby.
- Current provincial legislation and previous county policy assume reclamation of gravel pits back to their original use (usually agricultural), unless a case can be made that there is a higher value post-reclamation use.
 - The MDP is now proposing in Policy 3.3.1(h) that gravel pits should be reclaimed into other industrial uses instead. It is not clear how or why the MDP has chosen to deviate from provincial guidelines in this area.

Section 3.4 – Agriculture

- The MDP states that agriculture remains important in Rocky View. However, it dedicates just over one page to agriculture policies. In contrast, the existing County Plan has seven pages of agriculture policies.
 - While this shift may be an attempt to streamline the MDP, the virtual elimination of policies dealing with existing agricultural operations sends a negative message.
 - Feedback received during the limited public consultations indicated that residents placed high priority on maintaining the County's agricultural base. The MDP's minimalist approach to this important topic appears inconsistent with input from residents.
- The focus of Section 3.4 is on supporting "new, innovative agricultural ventures", encouraging small scale agricultural ventures, and allowing a "range of parcel sizes where appropriate".
 - The policies do not provide any direction on when it is appropriate to use smaller-scale agricultural operations or to discourage the unnecessary fragmentation of agricultural parcels.
- Policy 3.4.2 provides criteria for redesignation and subdivision for agricultural purposes.
 - The MDP's policies are facilitating subdivision of agricultural properties.
 - All that is required is a "rationale" for why the existing parcel size cannot accommodate the proposed new development. Rationales are easy to create. If the MDP actually wanted to discourage unnecessary fragmentation of agricultural lands, it would prohibit subdivision if the proposed new activities can be carried out under the land use designation of the existing agricultural parcel.

Section 3.5 – Environment

- The objectives in this section are significantly scaled back relative to the environmental objectives in the existing County Plan.
 - As was noted above under Agriculture, it is one thing to streamline a document, it is quite another to remove most of the policy guidance.
 - How is this consistent with the importance of the environment that was emphasized in resident feedback?
- *Policy 3.5.1 – growth management* states that “where development is proposed near potential ecological features ... the development application may require ... a bio-physical impact assessment.
 - The MDP indicates that it is dedicated to environmental sustainability. If that is true, why is this not a mandatory requirement?
- *Policy 3.5.3 – stormwater and wastewater* has removed the policies in the County Plan that required environmentally sustainable wastewater disposal practices. It is not clear why these are no longer relevant or necessary.
- *Policy 3.5.4 – Land & Environmental Stewardship* no longer directs development away from agricultural land as had been included in the County Plan. Again, it is not clear why this is no longer relevant or necessary.

Section 3.6 – Utility Servicing

- The MDP has taken the approach of offloading most of the policy guidance on these important issues to the County Servicing Standards.
 - This appears to be backwards. The MDP is supposed to be the County’s overarching planning document. As such, it should provide guidance on what level of utility servicing is required for different types of development. Then the Servicing Standards should provide the detail on how that will be achieved.



February 3, 2021

Rocky View County
Legislative Services
262075 Rocky View Point
Rocky View County, AB, T4A 0X2

legislativeservices@rockyview.ca

Re: Rocky View County Municipal Development Plan

Background Information

Elbow Valley® is a private, bare land condominium community of 699 homes and parkland located in Rocky View County along Highway 8 just west of the Calgary City Limit. The community consists of seven bare-land Condominium Corporations with all Common Property managed by Elbow Valley Residents Club (EVRC), a society created to manage the community and lands within.

Since 2007 Elbow Valley Residents Club (EVRC) is Registrant pursuant to Trademark Registration Number TMA694373 for the Word Mark "ELBOW VALLEY" for, among other things, carrying on the business of management and operation of a residential community.

The community is included in the County Map titled "South Springbank & Elbow Valley Area", but the boundaries of the Elbow Valley community are not specifically delineated on the map. Previously the map was titled "Elbow Valley", which led to much confusion between the community of Elbow Valley and the larger South Springbank area and its smaller communities, as well as the potential for trademark issues. Rocky View County, in consultation with EVRC, changed the map name a couple of years ago to address confusion related to development and CREB real estate transactions, but the re-naming did not specifically identify the community boundaries as the County does with the similarly scaled communities of Harmony and Watermark (Harmony and Watermark maps attached for reference).

EVRC is now in productive discussions with County Administration Planning Department with regard to Western Securities' proposed Gardner Ranch development, with the common purpose of addressing confusion that will occur if their proposed ASP is named 'West Elbow Valley ASP', as well as avoiding possible infringement on Elbow Valley's registered trademark.

Submission

The proposed new Rocky View County Municipal Development Plan (MDP) refers to Elbow Valley in the context of "Hamlet Growth Area" and "Existing and Planned Hamlet". For clarity, Elbow Valley is not presently designated as a Hamlet and this letter submission is not intended to apply for or promote such a designation. It is our contention that the use of Elbow Valley in reference to a 'Growth Hamlet Area' is both misleading and incorrect, as the area is a fully built-out, self-supporting, community where there is no possibility for future growth.

On draft MDP page 14 Figure 2: Growth Concept Map Identifying Priority Areas for Growth has a 'Hamlet Growth Area' symbol labelled 'Elbow Valley'. On page 16 Figure 3: Planned and Future Planning Growth Priority Areas captions 'Elbow Valley' as 'Existing and Planned Hamlet'. Section 2.5.1 Hamlet Growth Areas on page 24 lists hamlets, including 'Elbow View'. Elbow View is a proposed Area Structure Plan west of our Elbow Valley community along Highway 8.

Elbow Valley Residents Club requests that the Draft MDP be edited prior to being published for the Public Hearing so that present and future naming confusion is addressed, as is currently being discussed with County Administration..

Please contact the undersigned by email with questions or clarification.

Regards,

ELBOW VALLEY RESIDENTS CLUB



Terry Brooker
President, Board of Directors
terry.brooker@elbowvalley.org

cc. dkazmierczak@rockyview.ca

COMMUNITY OF HARMONY AREA MAP



Primary Highway	Subdivision Applications
Secondary Highway	Approved Subdivisions
Surface Type	Environmental Reserve
Paved	Municipal Reserve
Unbuilt	Municipal School Reserve
	Public Utility Lot
	Airport Boundary

ROCKY VIEW COUNTY
 REV 04 2020

COMMUNITY OF WATERMARK AREA MAP



Comments by Vivian Pharis of 193 Green Valley Estate, Rocky View County to RVC Hearing into Municipal Development Plan, Bylaw C-8090-2020

While the draft Municipal Development Plan appears to cover the same ground as the Rocky View County Plan did, overall it seems that the former is a glossier, more opaque version of the latter, which is a stronger, more user-friendly document. I don't know what is being gained, except to make things vague, but to what end? Perhaps easier and less concrete decisions by RVC Council? I do not see improvement between the County Plan and the new Municipal Plan. In fact, I see something more concrete and specific being replaced by something more glossy-vague.

It appears in the draft MDP that RVC supports what residents continue to tell them they want, which is to live in a healthy, rural environment with the amenities of nature nearby and accessible for their pleasure. But, RVC Council appears intent, in the draft plan, on moving the county towards greater urban development and residential densities. Allowing 1-acre parcels and more support for hamlets is a trend away from what residents say they want. It is perhaps however, a path to more residential taxes and a water/sewer supply if RVC can meet Calgary density requirements for such servicing. So, is it RVC's plan to surround two sides of Calgary with a bunch of hamlets of people who work in Calgary, use Calgary facilities and require Calgary's water and sewer? This sounds like a regional planning nightmare but appears to be what the RVC's draft MDP is predicated upon.

While RVC continues to recognize that residents overwhelmingly want more access to nature, better attention to trails development and interconnecting trails, wildlife provisions and more parks and park expansions, there seems no enhanced action on these matters in the MDP from the County Plan.

Just as Albertans are not buying the UCP's various attempts to obscure, turn around and contradict their poorly considered and publicly bereft plans to down-size the provincial parks system and to maintain that Eastern Slopes watersheds are protected just as they are being ripped apart by coal exploration, RVC residents see through plans to weaken their main governing document. Altering the overall format of the clearer, more user-friendly County Plan to something more opaque and inexact points ominously towards lesser oversight on developments and on protections for our environment and agricultural lands.

I would like to have seen a more robust inclusion in a new plan for protecting the environment such as:

- * protection for flowing waters and lakes, especially those that are fish-bearing
- * identifying important agricultural lands that will be maintained for agriculture
- * concrete plans to identify and protect wildlife corridors
- * concrete plans to acquire lands for trails and new parks and park expansions
- * clear plans to help local stewardship/watershed/recreation groups help RVC residents

Loss of Aggregate Resource Plan

The primary area I see very much weakened in the draft MDP over the County Plan, is the removal of a set of guidelines on how aggregate proposals are to proceed in RVC. Aggregate development is a contentious issue that is clearly not going away and needs to be addressed. Right now, goals for protecting the environment, including wetlands, conflict with aggregate development proposals. Even with the cowardly withdrawal of the nearly complete Aggregate Resource Plan in 2019, the County Plan still contains a set of permitting guidelines. The MDP has not included these and that weakens the plan unless a separate Aggregate Plan is to follow. Point 8 under The Aggregates Section confirms a repulsive rumor that has been circulating within the county for a while - that the intention of RVC is to use gravel pits as a stepping stone to more industrial development in the area of pits, including that abandoned pits be used as garbage landfills.

What a slap-in-the-face to Bearspaw residents and potentially to Bighill Springs Provincial Park! Keep the Rocky View County Plan.

Vivian Pharis, 193 Green Valley Estate, RVC, T4C 1A7; [REDACTED]

From: [Michelle Mitton](#)
To: [PlanningAdmin Shared](#)
Subject: FW: [EXTERNAL] - Bylaw C-8090-2020
Date: February 3, 2021 12:46:33 PM

MICHELLE MITTON, M.Sc

Legislative Coordinator – Legislative Services

ROCKY VIEW COUNTY

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From: Ailsa Le May

Sent: Wednesday, February 3, 2021 12:08 PM

To: Legislative Services Shared

Subject: [EXTERNAL] - Bylaw C-8090-2020

Do not open links or attachments unless sender and content are known.

I am writing in regards to Section 3.3 of the Municipal Development Plan. As we wait anxiously for Council to decide on the strongly-opposed Lehigh Hanson application for rezoning of the Scott Property, this directly relates. My fear is this is going to now be pushed through and then we are back at it again with the Scott property and adjacent industrial operations.

The existing County Plan's first goal for natural resource development was that natural resources should be extracted "in a manner that balances the needs of residents, industry, and society". The MDP proposes to change this wording to balancing "the needs of residents, industry, and the County". **It is unacceptable to remove society from this line.**

It also says it will change the working from "environmentally responsible management and extraction of natural resources". The MDP proposes only to have the "negative impacts on the environment" mitigated. This would imply it is ok to contaminate and then we will remediate and **is not an acceptable change.**

Policy 3.3.1(g) encourages the location of complimentary industrial activity adjacent to aggregate operations. This policy is extremely troubling.

The MDP provides no guidance on where it is appropriate to locate open pit gravel mines. Given this serious failing, how can the MDP possibly conclude that it is appropriate to locate other industrial uses adjacent to these operations? This opens the door for additional industrial activity in residential communities simply because there is a gravel pit nearby. This is completely unacceptable.

Policy 3.3.1 (h) directs future councils and aggregate companies to consider transitioning gravel pits into alternative industrial uses once gravel extraction has finished. Although proposed amendments to the 1st reading MDP will remove the examples of waste transfer and processing facilities, these remain active alternatives given the policy's wording.

The two above Policies 3.3.1 (g and h) need to be removed.

Thank you,
Ailsa Le May
Rocky View County Resident

From: [Michelle Mitton](#)
To: [PlanningAdmin Shared](#)
Subject: FW: [EXTERNAL] - Bylaw C-8090-2020
Date: February 3, 2021 12:02:08 PM

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From: Anne-Marie

Sent: Wednesday, February 3, 2021 12:00 PM

To: Legislative Services Shared

Subject: [EXTERNAL] - Bylaw C-8090-2020

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Rockyview council

We are opposed to the proposed changes in the aggregate policy in the MDP. Why the County's natural resource policy will no longer be part of its' overall land use policies makes no sense; especially, in light of the current Lehigh Hanson proposal that is before council today, Feb.3.

We support the objections submitted by Rockyview gravel watch in their letter to council. The fact is that the county feels it receives a great economic benefit from natural resource extraction in the area is false. The overall impact to the residents and the environment far exceeds the economic benefits to the county.

Aggregate resource extraction and management needs to be done in an environmentally responsible way. Mitigation is not always possible once the damage has been done.

Sometimes the best business decision is to say no.

The County could demonstrate its commitment to this policy by ensuring that residents' input is reviewed and incorporated by Administration as staff assess gravel company applications. Rocky View residents possess a tremendous wealth of relevant expertise on natural resource extraction issues. It is foolhardy to dismiss all that expertise and simply file it away unread and unused.

Policy 3.3.1 (c) discourages residential development that may be impacted by future aggregate extraction. Where is the parallel policy that discourages future aggregate extraction in locations that may impact existing residential development? If the County is committed to Policies 3.3.1(a) and (b) both sides need to be included in Policy 3.3.1 (c) to acknowledge the reality that residential development and heavy industrial open pit gravel mining are completely incompatible land uses.

It is one thing if residents move to an area where an existing aggregate extraction exists but quite another for such an industry to locate near an existing residential area.

Council must, as a bare minimum, amend the MDP in the following manner:

- Reinststate the list of technical studies required for all aggregate operations' master site development plans.
- Amend Policy 3.3.1(c) to provide parallel discouragement of future aggregate extraction in locations that may impact existing residential development.
- Remove Policies 3.3.1(g) and (h).

It would be better if Council reflected on the complexities involved in the recent Lehigh Hanson application and public hearing. The mutually acceptable guidelines for where aggregate operations should be located and how they should operate that would be provided in a stand-alone aggregate policy would have made the Lehigh Hanson public hearing far simpler.

Anne-Marie & Randall Block

From: [Michelle Mitton](#)
To: [PlanningAdmin Shared](#)
Subject: FW: [EXTERNAL] - feedback on Proposed Municipal Development Plan – Bylaw C-8090-2020
Date: February 3, 2021 1:04:10 PM

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From: Petrucci, Anthony

Sent: Wednesday, February 3, 2021 12:59 PM

To: Legislative Services Shared

Subject: [EXTERNAL] - feedback on Proposed Municipal Development Plan – Bylaw C-8090-2020

Do not open links or attachments unless sender and content are known.

Hello,

I just learned this morning that Rocky View is considering making changes to the Municipal Development Plan. My concern is as it relates to language around aggregate operations in the County.

Currently in the throes of the Lehigh Hanson application for Scott Pit, I can say I am (now) extremely concerned with the nature of the language put forth relating to aggregate operations.

In the Lehigh Hanson application, County administration revealed in the hearing that it didn't consider it 'necessary' to review the technical documents provided by landowners while recommending approval for Scott Pit.

This is truly hard to comprehend – that County administration would make recommendations without considering the submissions of landowners – instead relying solely on the assertions of the applicant and their well-compensated consultants. Surely anyone with a shred of common sense can see the folly of such a practice? And its obvious complete disregard for the people of the County who they are obliged to represent?

The stipulations regarding aggregate operations in the Municipal Development Plan must include clear language that submissions relating to aggregate extraction received from landowners, will be fully considered, and carry the same weight as the documents and assertions made by the proponents of such aggregate extraction.

Its actually quite incredible that such an assertion would have to even be made, but given what I've learned through the Lehigh Hanson application it is clearly necessary.

Please, lets have some common decency here. This is my first foray into such matters and I can't believe the state of affairs. Please start thinking about the people of your community. We are getting choked off by gravel pits in one of the most beautiful areas of the country I have ever seen. Can someone please be a grown up in the room, and get this sorted?

Cheers,

Anthony Petrucci

31 Alexa Close

Rocky View.



From: [Michelle Mitton](#)
To: [PlanningAdmin Shared](#)
Subject: FW: [EXTERNAL] - Bylaw c -8090-2020 Proposed Municipal Development Plan
Date: February 3, 2021 11:28:18 AM

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From: Bill & Sharon Corbett

Sent: Wednesday, February 3, 2021 7:46 AM

To: Legislative Services Shared

Subject: [EXTERNAL] - Bylaw c -8090-2020 Proposed Municipal Development Plan

Do not open links or attachments unless sender and content are known.

These comments are being provided by me on my own behalf and on behalf of Sharon Corbett. We are long time residents of the Bears paw area of RVC.

It was my intention to provide my own detailed comments but having reviewed the submissions of both Rocky View Gravel Watch (GW) and Rocky View Forward (RVF)I endorse and adopt their well reasoned and carefully articulated reviews. RVC is fortunate to have thoughtful residents who are prepared to take the time and make the effort to carry out such well reasoned reviews. Their comments represent the opinions of the vast majority of Rocky View Residents who are frustrated by County policies that seem drafted for the benefit of administration with little attention to the rights and interests of residents.

The thrust of the draft MDP seems to be to eliminate many already existing obligations, evidenced by the use of the word "shall" and replacing it with the permissive "should". This creates uncertainty for both proponents and objectors to a particular development. It does however grant the administrative staff essentially unfettered discretion with no accountability. This should not be the primary goal, as it apparently was with this draft of a MDP. I am reminded of the words of John Ivison writing in the Calgary Herald when he stated: "The idea that government is working entirely for the benefits of its citizens is a fallacy- politicians and bureaucrats are hard at work trying to improve their own lives and careers, often interests that compete directly with the public good."

Where every one else in the world is tightening up environmental requirements RVC is weakening them.

As pointed out in the GW submission par 3.3 comes straight from a gravel industry lobbyist and does not reflect reality. Council has detailed evidence on what are the actual economic benefits to the County in the recent public hearing for Bylaw 8082. They are minimal . The industry is not an important contributor and all such references should be changed.

The second goal for natural resource development should be to "permit" not support. The County will permit aggregate development where it can be done responsibly. Many negative impacts cannot be mitigated and the redraft language is unacceptable.

As the GW submission points out in 3.3.1 is unbalanced. There is no parallel requirement for future aggregate extraction to be discouraged where there is existing residential development. Deletion of actual requirements in the MSDP further erodes protections to the environment and the public.

It appears as if the Administration, after wasting thousands of dollars and untold hours of

residents' time, have not learned one thing but continue to act only in the interests of the gravel industry.

The planning department and administration as a whole, are quickly eroding what little remaining credibility they have with residents.

This draft needs to be sent back for a major rework ; in its present form it is unacceptable.

William Corbett/Sharon Corbett

From: [Michelle Mitton](#)
To: [PlanningAdmin Shared](#)
Subject: FW: [EXTERNAL] - Bylaw C-8090-2020
Date: February 3, 2021 11:25:10 AM

MICHELLE MITTON, M.SC
Legislative Coordinator – Legislative Services

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-----Original Message-----

From: [REDACTED]
Sent: Tuesday, February 2, 2021 9:15 PM
To: Legislative Services Shared <LegislativeServices@rockyview.ca>
Subject: [EXTERNAL] - Bylaw C-8090-2020

Do not open links or attachments unless sender and content are known.

We are residents of Bears paw. We, as are most other residents of our community, are extremely concerned about the possibility of another gravel pit in our community. It would appear that the County's new proposed MDP will make it easier for gravel pits to gain approval in our community. It would also appear that once there is more industry in the area that it will further encourage and allow additional industry. We moved to this area for the peace and quiet of living in the country so we can raise our two children. We strongly disagree with any changes to the MDP that will make it easier for industry to operate within a/our residential community.

Dave and Leslie Scabar
24131 Meadow Drive
Calgary, Alberta
T3R 1A7

From: [Michelle Mitton](#)
To: [PlanningAdmin Shared](#)
Subject: FW: [EXTERNAL] - Rocky View County Municipal Development Plan December 2020 Draft 4
Date: February 3, 2021 4:35:53 PM

MICHELLE MITTON, M.Sc

Legislative Coordinator | Legislative Services

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From: [REDACTED]
Sent: February 3, 2021 3:36 PM
To: Legislative Services Shared
Cc: Mark Kamachi
Subject: [EXTERNAL] - Rocky View County Municipal Development Plan December 2020 Draft 4

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Rocky View County Planners:

This letter registers my concerns and recommendations regarding the Draft Municipal Development Plan (MDP) December 2020. It appears the MDP's have a working lifetime of 5-10 years given previous versions. I believe we need to write each plan with the indigenous view of "our grandchildren's grandchildren" knowing that circumstances will change long before their turn at the Council table.

Alberta's fossil fuel industry is diminishing and our economy is changing to non-resource and knowledge-based industries, electrification technologies and sustainable agro-industrial bases. Climate warming has increased the intensity and frequency of extreme weather events with concurrent insurance losses in the billions each year (\$2.3 billion for Canada in 2020). Severe drought as in 2017 and catastrophic wildfires are a certainty in our future and we should include these events in our planning. Our human footprint in Rocky View County is growing larger and deeper. The result is loss of carrying capacity in our surrounding landscapes loss of our wildlife neighbours that preceded us by thousands of years. I believe we need to plan now to stop the continued loss of these irretrievable assets to our mental and physical health and the ecological services their habitat gives us and our grandchildren...like drinking water and toxin-free air. Rocky View is losing the reason to live here.

While the philosophy outlined in this draft plan seems reasonable in the short term (particularly densification in hamlet cores) I believe it misses in the long term as it tries to remove development barriers for large capital corporations at the expense of resident oversight and infrastructure costs (debt)! We must find ways to live within our revenue base in the coming low growth economy that doesn't offload development capital and operating expenses onto ratepayers. I don't believe our grandchildren will think this is a good document with glaring shortcomings I consider fatal. Here are some specific comments regard the following topics:

Hamlet Development 2.5.1 a, b, and c Replace "should" with "will". Developers will be guided by

February 1, 2021

Legislative Services
262075 Rocky View Point
Rocky View County
AB T4A 0X2

Re: Draft Municipal Development Plan Bylaw C-8090-2020

Dear Sirs:

My name is David Sutton. I am a taxpayer and homeowner, resident in Rocky View County. I have concerns with the latest draft Municipal Development Plan (MDP). In reviewing the latest draft MDP, I have a general comment and some specific comments.

General Comment

As a general comment, I believe that the MDP is incomplete. Perhaps I missed it, but other than a brief reference in Table 04 subpart 1(e) I can find no guidelines regarding how both commercial and residential development should be handled with regard to archeological areas that fall within the proposed development areas. While there may be other rules and regulations dealing with this issue, the MDP for completeness should address the issue and, at the very least, link to those rules and regulations.

Specific Comments

1. Section 1.3 Guiding Principles. One of the key principles guiding any decision making is one of fiscal responsibility. This key principle is sadly lacking in these Guiding Principles.
2. Page 18 h (i) The proposed changes appear to deal with what the developable land **can** handle. This subsection should address what the developable land **should** handle. As the wording now stands, density ranges and dwelling unit numbers could determine that the developable land could handle high density housing for the all the developable land. That doesn't mean that it should. In fact, based upon the discussion in the Land Use Policies, it shouldn't, as it " may also lower the quality of life for existing residents by eroding the rural character of areas or adding greater pressure on existing infrastructure and municipal services" P.12 bottom of first paragraph.
3. Page 22 f (vi) The current language requires that the proposed development have " the potential to provide a substantial financial benefit to the County". A financial benefit by itself is insufficient as the development may come with an even higher financial cost. Any decision on a new development must consider benefit and cost. To do otherwise puts the taxpayer once again at risk of funding inappropriate developments. The language for this subsection should read " the potential to provide a substantial **net** financial benefit to the County.
4. Page 48 Section 4.2 subsection (e) Developer-funded area structure plans and conceptual schemes that incorporate public and stakeholder engagement are meaningless if all the developer does is go through the the motions of engagement. The wording in this section should be amended to the following: " the County shall permit developer-funded area structure plans and conceptual schemes that incorporate **meaningful** public and stakeholder engagement.."

5. Page 25 Section 2.5.2 Small Hamlets. In the first paragraph in which the Small Hamlets are listed, the Hamlet of Indus is listed twice. Is this intentional?

In summary, I am uncomfortable with the current draft MDP. My overall concern is summarized nicely on Page 12 and I have referenced it earlier. That is “ Additional exurban development may also lower the quality of life for existing residents by eroding the rural character of areas or adding greater pressure on existing infrastructure and municipal services.” I see nothing in the latest draft MDP that alleviates my concerns, in fact, this MDP only increases those concerns.

Respectfully submitted

David Sutton

To: Rocky View Council
Subject: **Proposed Municipal Development Plan – Bylaw C-8090-2020**
Date: February 3, 2021

As a resident in the District of Rocky View, and strong opponent of Bylaw C-8082-2020, it has encouraged me to become more aware of what is happening in our area. Through my involvement with C-8082-2020, I learned that the proposed MDP is deficient in a number of ways. Now is the time to clean up this gravel issue in our district. The Rocky View Gravel Watch has done a spectacular job of monitoring and pointing out deficiencies. This group should be a strong source of education and experienced opinions for the county. They should be listened to and as it grows with more support from residences, many experts, become a combined voice for us.

Section 3.3.1 If the County genuinely wants to find the balance that protects its residents and its environment while permitting responsible aggregate extraction, far more specific guidance is required and the guidance that had been provided in the County Plan must be reinstated.

If the County is actually committed to encouraging the collaboration described in this policy 3.3.1 (b), it needs to take an active role in engaging residents and adjacent landowners to identify possible solutions to mitigate the unavoidable negative impacts from aggregate extraction. Residents all understand that aggregate extraction is necessary. They, like Gravel Watch, are simply looking for it to be done in a responsible manner that does not impose unnecessary costs and damage.

If that is not the intended message, Council must, as a bare minimum, amend the MDP in the following manner:

- Reinstatement of the list of technical studies required for all aggregate operations' master site development plans.
- Amend Policy 3.3.1(c) to provide parallel discouragement of future aggregate extraction in locations that may impact existing residential development.
- Remove Policies 3.3.1(g) and (h).

Sincerely

Dawn Rosine



Steven Lancashire

From: Debbie Mckenzie [REDACTED]
Sent: February 3, 2021 1:12 PM
To: Legislative Services Shared; Jessica Anderson
Cc: Dominic Kazmierczak; Michelle Mitton; kevin.hansen@rockyview.ca; Division 2, Kim McKylor; Division 1, Mark Kamachi; Division 4, Al Schule; Division 5, Jerry Gautreau; gboehike@rockyview.ca; Division 7, Daniel Henn; Division 8, Samantha Wright; Division 9, Crystal Kissel; transportation.minister@gov.ab.ca
Subject: [EXTERNAL] - Re: objection to Springbank ASP's and MDP

Do not open links or attachments unless sender and content are known.

Dear Rocky View Planning & Council Members,

I am a resident of the Springbank area, and would like to address the following

RE:

BYLAW C-8031-2020 North Springbank Area Structure Plan

BYLAW C-8064-2020 South Springbank Area Structure Plan

Municipal Development Plan Bylaw C-8090-2020

Plans should not be approved without prior demonstrated assurance of sufficient and adequate infrastructure, including water (potable water supply & wastewater treatment), transportation (traffic impacts & roads capacity), and rationalized sustainable limits to total development. Simply allowing multiple developers to plan independently is a disaster waiting to return to the County for resolution of future discrepancies or inadequacies, where the responsibility to rectify any problems will surely rest with RVC Council and its constituents (i.e., voters).

Critical issues include:

1. Proposed development plans indicate that no water or sewage plans or licenses have been approved. The ASP seems to indicate there will be water, but not how or from where, and taxpayers will pay for whatever water systems the developer chooses, but initially water & sewage can be trucked in? Plans refer to piped water from Harmony, but that license stipulates it is for Harmony alone. Water is already over-allocated in the Bow River basin and shortages will only increase as environmental and climate conditions change, even more so if SR1 goes ahead in the absence of a dam that can hold water for later use.
2. The existing "country residential" definition of 2 acres, seems to have been changed to 1 acre or smaller, with repeated areas of "cluster residential" of .5 acre. However the 2 acre minimum reflects a size that can be managed with on-site septic systems. A

viable and sustainable system for treating wastewater should be required by Rocky View County prior to approval.

3. These development plans will significantly increase the traffic on Old Banff Coach Road. Old Banff Coach Road has been drawn on some of these plans as having four (4) lanes, even with signalized traffic lights. It is a narrow historic highway, already carrying far more traffic than it was designed for and prone to repeated accidents due to difficult curves, with many hidden driveways and connecting roads. It would appear that some homes will have to be acquired and destroyed to allow for this. A comprehensive traffic impact assessment should be required before permitting any expansion of this road, as well as a guarantee that Rocky View County and its residents will not be on the hook for financing any road improvements, mitigations or remediation measures now or at any time in the future. Further, any approval by RVC of land developments that will impact areas of provincial jurisdiction (i.e., Old Banff Coach Road) should have prior agreement from the Ministry of Transportation, Government of Alberta.

Sincerely,

Deborah McKenzie

206 Artists View Way

From: [Michelle Mitton](#)
To: [Dominic Kazmierczak](#)
Cc: [Steven Lancashire](#)
Subject: FW: [EXTERNAL] - MUNICIPAL DEVELOPMENT PLAN - Bylaw C-8090-2020
Date: February 1, 2021 1:18:19 PM

MICHELLE MITTON, M.Sc
Legislative Coordinator | Legislative Services

ROCKY VIEW COUNTY
262075 Rocky View Point | Rocky View County | AB | T4A 0X2
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MMitton@rockyview.ca | www.rockyview.ca

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From: Debbie Vickery [REDACTED]
Sent: January 31, 2021 10:37 PM
To: Legislative Services Shared <LegislativeServices@rockyview.ca>
Subject: [EXTERNAL] - MUNICIPAL DEVELOPMENT PLAN - Bylaw C-8090-2020

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Below is a transmittal of concerns that make this MDP not acceptable. Please provide written answers to questions. An I would like RVC to not accept this MDP.

Thanks,
Debbie Vickery
3 Shantara Grove
T3Z3N2

As we have said before, **the differences between the County Plan, our current MDP, and the new MDP are NOT positive for residents.** The Feb. 16 public hearing will be the **last opportunity for residents to express their views** on the proposed changes. **If you don't support the dramatically different direction the MDP is taking, be sure to get your comments in to the County.**

Whereas the **County** Plan was developed after extensive consultation with Rocky View residents. Its direction and policies reflected input from people who have chosen Rocky View as their homes.

In contrast, there has been minimal public engagement in the development of the Municipal Development Plan (MDP). Despite this, the consultation clearly demonstrated that the **priorities of Rocky View residents** are the same as they were in 2013 when the County Plan was adopted – **to retain the County's rural character; to support and protect its agricultural base; to protect the environment; and to ensure that growth is both orderly and fiscally responsible.**

The **MDP's principles pay lip service to some of these priorities** but **completely ignore residents' top priority – preserving the County's rural character.** A last-minute change to its community development

principle is also disturbing. It will now read – “Rocky View County will build resilient communities and welcoming neighbourhoods **by promoting concentrated growth within designated development areas**”. The bolded/underlined words are new. It is difficult to interpret this change as anything other than **direction to push higher density, urban-style development** as a core feature of the MDP. The question is where did this last-minute change come from?

This change reinforces the MDP’s support for “higher density residential development **where appropriate**”. On its face, this may sound somewhat reasonable. However, the MDP doesn’t provide any policy guidance for what “appropriate” means. As a result, the determination of “appropriateness” will be left solely to council’s discretion.

Another last-minute change has the MDP acknowledging that **traditional agricultural activities should be recognized** in its principles. However, no changes have been made in the policies on agriculture. **Instead, these continue to focus almost exclusively on facilitating agricultural diversification – frequently “code” for the fragmentation of agricultural lands.**

From our perspective, other problems in the MDP include that it:

- Facilitates leapfrog development by **substantially expanding “priority growth areas”**.
 - **Fails to provide any constraints** on (orderly) development within these areas.
- Shifts the perspective on why regional partnerships are important.
 - The County Plan’s focus was to extend the range of services available to residents. The **MDP’s focus is only on resolving development challenges.**
- **Redefines country residential development to include 1-acre parcels, which will further erode the County’s rural character.**
 - The original concept of country residential developments is that they are self-sustaining properties without the need for off-site water or wastewater servicing. **This is not possible for 1-acre parcels.**
- Includes **full-service hamlets that currently don’t exist (Glenbow & West Balzac)** in its priority growth areas.
 - In contrast, **fiscally responsible policies would focus development in areas with pre-existing infrastructure.**
- Guts the effectiveness of the MDP to provide the over-arching direction for the County’s future development by **loosening policy guidance** from “shall” to “should”.
 - “Must do” requirements become “it would be nice if you did” aspirational statements.
- **Removes restrictions on commercial/industrial development** adjacent to major highways.
 - **Ignores residents’ clear priority to maintain scenic vistas** along these corridors.
- **Abandons guidance for future open pit gravel mines** by eliminating requirements for what must be included in applicants’ master site development plans.
 - **Facilitates complementary industrial activities** to locate adjacent to gravel pits.
 - Encourages reclamation to other industrial uses.

Overall, we feel that **the MDP lacks consistency**. It “talks the talk” of rational land use planning; but **fails to “walk the walk”**. Instead, **its policies reflect the develop-at-any-cost preferences of the council majority**

and their supporters in the development community. The MDP's significantly looser rules and more permissive oversight should bring cheer to these private interests. Unfortunately, the same cannot be said for the people who actually live in Rocky View.

From: [Michelle Mitton](#)
To: [PlanningAdmin Shared](#)
Subject: FW: [EXTERNAL] - Re: objection to Springbank ASP's and MDP
Date: February 3, 2021 1:16:45 PM

MICHELLE MITTON, M.Sc

Legislative Coordinator – Legislative Services

ROCKY VIEW COUNTY

262075 Rocky View Point | Rocky View County | AB | T4A 0X2

Phone: 403-520- 1290 |

MMitton@rockyview.ca | www.rockyview.ca

From: Debbie Mckenzie

Sent: Wednesday, February 3, 2021 1:12 PM

To: Legislative Services Shared ; Jessica Anderson

Cc: Dominic Kazmierczak ; Michelle Mitton ; kevin.hansen@rockyview.ca; Division 2, Kim McKylor ; Division 1, Mark Kamachi ; Division 4, Al Schule ; Division 5, Jerry Gautreau ; gboehike@rockyview.ca; Division 7, Daniel Henn ; Division 8, Samantha Wright ; Division 9, Crystal Kissel ; transportation.minister@gov.ab.ca

Subject: [EXTERNAL] - Re: objection to Springbank ASP's and MDP

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Dear Rocky View Planning & Council Members,
 I am a resident of the Springbank area, and would like to address the following

RE:

BYLAW C-8031-2020 North Springbank Area Structure Plan
BYLAW C-8064-2020 South Springbank Area Structure Plan
Municipal Development Plan Bylaw C-8090-2020

Plans should not be approved without prior demonstrated assurance of sufficient and adequate infrastructure, including water (potable water supply & wastewater treatment), transportation (traffic impacts & roads capacity), and rationalized sustainable limits to total development. Simply allowing multiple developers to plan independently is a disaster waiting to return to the County for resolution of future discrepancies or inadequacies, where the responsibility to rectify any problems will surely rest with RVC Council and its constituents (i.e., voters).

Critical issues include:

1. Proposed development plans indicate that no water or sewage plans or licenses have been approved. The ASP seems to indicate there will be water, but not how or from where, and taxpayers will pay for whatever water systems the developer chooses, but initially water & sewage can be trucked in? Plans refer to piped water from Harmony, but that license stipulates it is for Harmony alone. Water is already over-allocated in the Bow River basin and shortages will only increase as environmental and climate conditions change, even more so if SR1 goes ahead in the

absence of a dam that can hold water for later use.

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3. These development plans will significantly increase the traffic on Old Banff Coach Road. Old Banff Coach Road has been drawn on some of these plans as having four (4) lanes, even with signalized traffic lights. It is a narrow historic highway, already carrying far more traffic that it was designed for and prone to repeated accidents due to difficult curves, with many hidden driveways and connecting roads. It would appear that some homes will have to be acquired and destroyed to allow for this. A comprehensive traffic impact assessment should be required before permitting any expansion of this road, as well as a guarantee that Rocky View County and its residents will not be on the hook for financing any road improvements, mitigations or remediation measures now or at any time in the future. Further, any approval by RVC of land developments that will impact areas of provincial jurisdiction (i.e., Old Banff Coach Road) should have prior agreement from the Ministry of Transportation, Government of Alberta.

Sincerely,

Deborah McKenzie

206 Artists View Way

Steven Lancashire

From: Michelle Mitton
Sent: January 25, 2021 8:45 AM
To: Dominic Kazmierczak
Subject: FW: [EXTERNAL] - Bylaw C-8090-2020

MICHELLE MITTON, M.Sc
 Legislative Coordinator | Legislative Services

ROCKY VIEW COUNTY
 262075 Rocky View Point | Rocky View County | AB | T4A 0X2
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From: Beaven, Denise [REDACTED]
Sent: January 23, 2021 12:31 PM
To: Legislative Services Shared <LegislativeServices@rockyview.ca>
Subject: [EXTERNAL] - Bylaw C-8090-2020

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I totally oppose the new Municipal Development Plan (MDP) that council is proposing. It is simply not positive for residents. The old and new MDP plans are dramatically different! The County plan was developed after extensive consultation with Rocky View residents. Its direction and policies reflected input from people who have chosen Rocky View as their home. The proposed plan has not considered keeping any of the existing components that the County Plan contained. Council is showing total disregard for the residents of this community. Our views are just tossed a side and wiped clean like they never existed. Residents' top priority – is preserving the County's rural character. The new MDP supports Rocky View County will build communities/neighborhoods by promoting concentrated growth within designated development areas. Our residents do NOT want concentrated growth within designated development areas. If you want that, you can move to Calgary. Again it is most important to our residents to **preserve the County's rural character.**

From our perspective, other problems in the MDP include that it:

- Facilitates leapfrog development by substantially expanding "priority growth areas".
 - o Fails to provide any constraints on orderly development within these areas.
- Shifts the perspective on why regional partnerships are important.
 - o The County Plan's focus was to extend the range of services available to residents. The MDP's focus is only on resolving development challenges.

- Redefines country residential development to include 1-acre parcels, which will further erode the County's rural character.
 - o The original concept of country residential developments is that they are self-sustaining properties without the need for off-site water or wastewater servicing. This is not possible for 1-acre parcels.
- Includes full-service hamlets that currently don't exist (Glenbow & West Balzac) in its priority growth areas.
 - o In contrast, fiscally responsible policies would focus development in areas with pre-existing infrastructure.
- Guts the effectiveness of the MDP to provide the over-arching direction for the County's future development by loosening policy guidance from "shall" to "should".
 - o "Must do" requirements become "it would be nice if you did" aspirational statements.
- Removes restrictions on commercial/industrial development adjacent to major highways.
 - o Ignores residents' clear priority to maintain scenic vistas along these corridors.
- Abandons guidance for future open pit gravel mines by eliminating requirements for what must be included in applicants' master site development plans.
 - o Facilitates complementary industrial activities to locate adjacent to gravel pits.
 - o Encourages reclamation to other industrial uses.

Overall, we feel that the MDP lacks consistency. It "talks the talk" of rational land use planning; but fails to "walk the walk". Instead, its policies reflect the develop-at-any-cost preferences of the council majority and their supporters in the development community. The MDP's significantly looser rules and more permissive oversight should bring cheer to these private interests. Unfortunately, the same cannot be said for the people who actually live in Rocky View.

In conclusion, I oppose the new MPD. Instead please take the current County Plan and make modifications to that and solicit residents input. Please listen to your residents who live and pay taxes in this community.

Denise Beaven

335 Whispering Water Bend

February 3, 2021

To: Rocky View Council

Subject: Proposed Municipal Development Plan – Bylaw C-8090-2020

I am commenting only on the proposed provisions in Section 3.3 of the new Municipal Development Plan (MDP) that apply to aggregate operations in the County. I have serious concerns with the changes in aggregate policy that are being proposed in the MDP. The changes are a severe scaling-back of the guidance provided in the current County Plan.

Why will the County's natural resource policy no longer be part of its overall land use policies? The land uses in that section deal with residential, commercial, industrial, and institutional land use policies. These all apply to their respective land uses across the County just as do the policies for natural resource development.

The County has an important role in ensuring that aggregate development in Rocky View is undertaken in a responsible manner that **protects both the County's residents and its environment.**

Policy 3.3.1(g) encourages the location of complimentary industrial activity adjacent to aggregate operations. This policy is extremely troubling.

The MDP provides no guidance on where it is appropriate to locate open pit gravel mines. Given this serious failing, how can the MDP possibly conclude that it is appropriate to locate other industrial uses adjacent to these operations? This opens the door for additional industrial activity in residential communities simply because there is a gravel pit nearby. This is completely unacceptable.

Policy 3.3.1 (h) directs future councils and aggregate companies to consider transitioning gravel pits into alternative industrial uses once gravel extraction has finished. Although proposed amendments to the 1st reading MDP will remove the examples of waste transfer and processing facilities, these remain active alternatives given the policy's wording.

One of the justifications the County has always used to permit gravel pits in otherwise highly incompatible locations is that they are a temporary use. Although 25 – 50-year aggregate operations are far from most peoples' definition of "temporary", at least there is a long-range hope that former gravel pits will, someday, be reclaimed to their original state.

One of the justifications the County has always used to permit gravel pits in otherwise highly incompatible locations is that they are a temporary use. Although 25 – 50-year aggregate operations are far from most peoples' definition of "temporary", at least there is a long-range hope that former gravel pits will, someday, be reclaimed to their original state.

Current provincial legislation and previous county policy assume that gravel pits will be reclaimed back to their original use (usually agricultural), unless a case can be made that there is a higher value post-reclamation use. This policy is a dramatic departure from this longstanding approach to aggregate operations. It is not clear how or why the MDP has chosen to deviate from provincial guidelines in this area.

The two above Policies 3.3.1 (g and h) need to be removed.

Thank you,
Donna Wasson
Rocky View County Resident

From: [Michelle Mitton](#)
To: [PlanningAdmin Shared](#)
Subject: FW: [EXTERNAL] - Bylaw C-8090-2020. *Kindly acknowledge receipt*
Date: February 3, 2021 2:27:34 PM

MICHELLE MITTON, M.Sc
 Legislative Coordinator – Legislative Services
ROCKY VIEW COUNTY
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 Phone: 403-520- 1290 |
MMitton@rockyview.ca | www.rockyview.ca

From: DOUGLAS MORRISON
Sent: Wednesday, February 3, 2021 2:18 PM
To: Legislative Services Shared
Cc: morrisondd
Subject: [EXTERNAL] - Bylaw C-8090-2020. *Kindly acknowledge receipt*

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My response and concerns:
 Doug Morrison

As a member of the Rocky View I hav serious concerns with the changes in aggregate policy that are being proposed in the MDP. The changes are a severe scaling-back of the guidance provided in the current County Plan. From a basic organizational perspective, it is completely unclear why the County’s natural resource policy will no longer be part of its overall land use policies. The land uses in that section deal with residential, commercial, industrial, and institutional land use policies. These all apply to their respective land uses across the County just as do the policies for natural resource development.

Introductory Paragraph to Section 3.3

Further I object strongly to the underlying assumption in the introduction to the Natural Resources section. Contrary to the MDP’s Rocky View Gravel Watch is commenting only on the proposed provisions in Section 3.3 of the new Municipal Development Plan (MDP) that apply to aggregate operations in the County. Surely have having just dealt this the Lehigh Hanson application - things need to change so the people come first and aggregate second.

Assertion, natural resource development is **not** an “important contributor to the local economy”. It is important to the regional economy and Rocky View Gravel Watch has always recognized that. However, the County receives minimal revenue from any natural resource development and many, if not most, of the employment opportunities generated by natural resource

activities in the County are filled by residents of our urban neighbours. The only significant revenue the County receives from aggregate resource development is the Community Aggregate Payment levy. The CAP levy, even at its increased rate, does not come close to covering the costs of damage to the roads caused by heavy gravel trucks.

The County needs to acknowledge the “myth” associated with the opening statement. Maintaining this façade has resulted in the County downplaying its important role in ensuring that aggregate development in Rocky View is undertaken in a responsible manner that protects both the County’s residents and its environment.

It has never been clear why Rocky View is willing to sacrifice its residents and its environment for the benefit of the broader region for minimal direct benefit to itself. It is not as if Rocky View receives any commensurate benefit from its regional neighbours on other issues in exchange.

The introduction recognizes that resource extraction requires “careful consideration for how extraction is planned and implemented” because of the significant impacts it has on adjacent land uses and the environment. These statements are of critical importance. With Council’s earlier decision to cease work on a stand-alone aggregate resource plan, the guidance to ensure that this “careful consideration” is achieved must be provided in the MDP. Unfortunately, the MDP’s policies are completely inadequate to ensure that the acknowledged “community concerns” and “significant impacts” from resource extraction are addressed.

Objectives

The existing County Plan’s first goal for natural resource development was that natural resources should be extracted “in a manner that balances the needs of residents, industry, and society”. The MDP proposes to change this wording to balancing “the needs of residents, industry, and the County”. What happened to society? The changed wording is much more inward looking and devalues the broader societal worth of environmental protection.

The second goal in the County Plan was to support “environmentally responsible management and extraction of natural resources”. The MDP proposes only to have the “negative impacts on the environment” mitigated. What happened to being environmentally responsible?

Section 3.3.1 – Aggregate Extraction Policies

The actual policies in this section, with the exceptions noted below, are appropriate motherhood statements. Unfortunately, as has been demonstrated repeatedly as various open pit gravel mining applications

have come before Rocky View's councils, more than platitudes are needed. If the County genuinely wants to find the balance that protects its residents and its environment while permitting responsible aggregate extraction, far more specific guidance is required and the guidance that had been provided in the County Plan must be reinstated.

Policy 3.3.1 (a) states that the adverse impacts should be minimized for existing residents, adjacent land uses and the environment. That is appropriate. However, without detail on how to determine effective mitigation it becomes a meaningless box-ticking exercise when aggregate companies come forward with open pit gravel mine applications.

Policy 3.3.1 (b) encourages collaboration between the County, residents, and industry to develop mutually agreeable solutions. Again, without any detail or commitment from the County, this is a meaningless platitude. If the County is actually committed to encouraging the collaboration described in this policy, it needs to take an active role in engaging residents and adjacent landowners to identify possible solutions to mitigate the unavoidable negative impacts from aggregate extraction. Residents all understand that aggregate extraction is necessary. I, like Gravel Watch, are simply looking for it to be done in a responsible manner that does not impose unnecessary costs and damage.

For a start, the County could demonstrate its commitment to this policy by ensuring that residents' input is reviewed and incorporated by Administration as staff assess gravel company applications. Rocky View residents possess a tremendous wealth of relevant expertise on natural resource extraction issues. It is foolhardy to dismiss all that expertise and simply file it away unread and unused.

Policy 3.3.1 (c) discourages residential development that may be impacted by future aggregate extraction. Where is the parallel policy that discourages future aggregate extraction in locations that may impact existing residential development?

If the County is committed to Policies 3.3.1(a) and (b) both sides need to be included in Policy 3.3.1 (c) to acknowledge the reality that residential development and heavy industrial open pit gravel mining are completely incompatible land uses.

At an absolute bare minimum, the MDP needs to provide guidance for how these "future aggregate" locations are to be determined. Given that Rocky View has some of the most generous aggregate deposits in North America, without such guidance, this policy could potentially limit non-aggregate development in most of the County. We assume that is not actually the

County's intention.

Policy 3.3.1 (f) requires that aggregate extraction applications must prepare a master site development plan. This policy is where the MDP fails County residents and future councils most dramatically, especially in comparison to the current County Plan. The MDP eliminates the list of technical studies that are required as part of master site development plans. WHY?

The County Plan recognized the complexities involved in decision-making regarding aggregate operations. To address that, it directed Administration to prepare a stand-alone policy to provide the detailed guidance needed by all parties. This Council killed that initiative and has taken no positive steps to replace it. Now, Policy 3.3.1 (f) removes the stopgap guidance the County Plan provided before its anticipated aggregate resource plan was developed.

What possible rationale is there to remove the County Plan's appendix that lists the technical studies required in support of any aggregate extraction application? How will councils ensure that residents and the environment are protected as they make decisions on future aggregate applications if there are not even a consistent set of technical reports to assess these applications?

Policy 3.3.1(g) encourages the location of complimentary industrial activity adjacent to aggregate operations. This policy is extremely troubling. The MDP provides no guidance on where it is appropriate to locate open pit gravel mines. Given this serious failing, how can the MDP possibly conclude that it is appropriate to locate other industrial uses adjacent to these operations? This opens the door for additional industrial activity in residential communities simply because there is a gravel pit nearby. This is completely unacceptable.

Policy 3.3.1 (h) directs future councils and aggregate companies to consider transitioning gravel pits into alternative industrial uses once gravel extraction has finished. Although proposed amendments to the 1st reading MDP will remove the examples of waste transfer and processing facilities, these remain active alternatives given the policy's wording.

One of the justifications the County has always used to permit gravel pits in otherwise highly incompatible locations is that they are a temporary use. Although 25 – 50-year aggregate operations are far from most peoples' definition of "temporary", at least there is a long-range hope that former gravel pits will, someday, be reclaimed to their original state.

Current provincial legislation and previous county policy assume that gravel pits will be reclaimed back to their original use (usually agricultural), unless

a case can be made that there is a higher value post-reclamation use. This policy is a dramatic departure from this longstanding approach to aggregate operations. It is not clear how or why the MDP has chosen to deviate from provincial guidelines in this area.

Conclusions

The MDP, as currently drafted, sends a strong message to residents that the County no longer cares about them or their environment when it comes to dealing with the many unavoidable negative impacts that accompany aggregate operations.

If that is not the intended message, Council must, as a bare minimum, amend the MDP in the following manner:

If that is not the intended message, Council must, as a bare minimum, amend the MDP in the following manner:

Reinstate the list of technical studies required for all aggregate operations' master site development plans.

Amend Policy 3.3.1(c) to provide parallel discouragement of future aggregate extraction in locations that may impact existing residential development.

Remove Policies 3.3.1(g) and (h).

It would be better if Council reflected on the complexities involved in the recent Lehigh Hanson application and public hearing. The mutually acceptable guidelines for where aggregate operations should be located and how they should operate that would be provided in a stand-alone aggregate policy would have made the Lehigh Hanson public hearing far simpler.

It would be better if Council reflected on the complexities involved in the recent Lehigh Hanson application and public hearing. The mutually acceptable guidelines for where aggregate operations should be located and how they should operate that would be provided in a stand-alone aggregate policy would have made the Lehigh Hanson public hearing far simpler.

February 1, 2021

To: Rocky View County Council (RVCC)

From: Eric Lloyd

Subject: Bylaw C-8090-2020: My Input on draft 4 of the Municipal Development Plan (MDP)

I am opposed to the subject draft of the MDP for the following reasons:

1. The MDP is too flexible with most policies now being optional due to use of the word "should" versus "shall". Since the June 2020 draft version, Rocky View County (RVC) has changed "shall" to "should" in approximately 25 policies. I believe this makes the MDP a **gutless** framework for development. RVCC would have the discretion to ignore most policies in the MDP, which could lead to inappropriate development, wherever a developer chooses. Furthermore the public feedback on the June 2020 draft version did not indicate that RVC residents wanted the MDP to be more flexible. I believe these changes were made to appease developers, but they do not reflect what RVC residents want. Please change the use of the word "should" back to "shall" in those approximately 25 policies.
2. The MDP doesn't specifically protect the Elbow River Alluvial Aquifer from development. The Elbow River is extremely important to many Albertans as a source of water. It has been scientifically documented that protection of the Elbow River Alluvial Aquifer is critical for this watershed and water. The water quality in the Elbow River has been deteriorating for decades and that trend needs to be reversed. A detailed map of the Elbow River Alluvial Aquifer is available and should be attached to the MDP with a policy stating there **shall** be no new development permitted on the Elbow River Alluvial Aquifer. Please make this important change.
3. The RVC public consultation process for the creation of this MDP has been inadequate with most RVC residents being unaware of the initiative. Furthermore, RVC is currently making changes to the draft MDP and will continue to do so until and at the February 16 hearing. How will RVC residents be able to provide feedback on these changes if they are not given sufficient opportunity to review them and respond to RVC? How will RVC be able to make informed decisions given they will not have public feedback on the changes? I suggest you conduct a proper round of public consultation on draft 5 of the MDP after the February 16 hearing.

Thanks for the opportunity to provide my input to RVCC on this matter.

Sincerely,



Eric Lloyd

██████████ Bragg Creek AB T0L0K0, ██████████
██████████

From: [Michelle Mitton](#)
To: [Dominic Kazmierczak](#)
Cc: [Steven Lancashire](#)
Subject: FW: [EXTERNAL] - MUNICIPAL DEVELOPMENT PLAN - Bylaw C-8090-2020
Date: February 1, 2021 1:20:11 PM

MICHELLE MITTON, M.Sc
Legislative Coordinator | Legislative Services

ROCKY VIEW COUNTY
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From: Garth Vickery [REDACTED]
Sent: February 1, 2021 12:05 AM
To: Legislative Services Shared <LegislativeServices@rockyview.ca>
Subject: [EXTERNAL] - MUNICIPAL DEVELOPMENT PLAN - Bylaw C-8090-2020

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Subject: MUNICIPAL DEVELOPMENT PLAN - Bylaw C-8090-2020

Below is a transmittal of concerns that make this MDP not acceptable. Please provide written answers to questions. And I would like RVC to not accept this MDP.

GarthVickery
3 Shantara Grove
T3Z3N2

As we have said before, **the differences between the County Plan, our current MDP, and the new MDP are NOT positive for residents.** The Feb. 16 public hearing will be the **last opportunity for residents to express their views** on the proposed changes. **If you don't support the dramatically different direction the MDP is taking, be sure to get your comments in to the County.**

Whereas the **County** Plan was developed after extensive consultation with Rocky View residents. Its direction and policies reflected input from people who have chosen Rocky View as their homes.

In contrast, there has been minimal public engagement in the development of the Municipal Development Plan (MDP). Despite this, the consultation clearly demonstrated that the **priorities of Rocky View residents** are the same as they were in 2013 when the County Plan was adopted – **to retain the County’s rural character; to support and protect its agricultural base; to protect the environment; and to ensure that growth is both orderly and fiscally responsible.**

The **MDP’s principles pay lip service to some of these priorities** but **completely ignore residents’ top priority – preserving the County’s rural character.** A last-minute change to its community development principle is also disturbing. It will now read – “Rocky View County will build resilient communities and welcoming neighbourhoods **by promoting concentrated growth within designated development areas**”. The bolded/underlined words are new. It is difficult to interpret this change as anything other than **direction to push higher density, urban-style development** as a core feature of the MDP. The question is where did this last-minute change come from?

This change reinforces the MDP’s support for “higher density residential development **where appropriate**”. On its face, this may sound somewhat reasonable. However, the MDP doesn’t provide any policy guidance for what “appropriate” means. As a result, the determination of “appropriateness” will be left solely to council’s discretion.

Another last-minute change has the MDP acknowledging that **traditional agricultural activities should be recognized** in its principles. However, no changes have been made in the policies on agriculture. **Instead, these continue to focus almost exclusively on facilitating agricultural diversification – frequently “code” for the fragmentation of agricultural lands.**

From our perspective, other problems in the MDP include that it:

- Facilitates leapfrog development by **substantially expanding “priority growth areas”**.
 - **Fails to provide any constraints** on (orderly) development within these areas.
- Shifts the perspective on why regional partnerships are important.
 - The County Plan’s focus was to extend the range of services available to residents. **The MDP’s focus is only on resolving development challenges.**
- **Redefines country residential development to include 1-acre parcels, which will further erode the County’s rural character.**
 - The original concept of country residential developments is that they are self-sustaining properties without the need for off-site water or wastewater servicing. **This is not possible for 1-acre parcels.**
- Includes **full-service hamlets that currently don’t exist (Glenbow & West Balzac)** in its priority growth areas.
 - In contrast, **fiscally responsible policies would focus development in areas with pre-existing infrastructure.**
- Guts the effectiveness of the MDP to provide the over-arching direction for the County’s future development by **loosening policy guidance** from “shall” to “should”.
 - “Must do” requirements become “it would be nice if you did” aspirational statements.
- **Removes restrictions on commercial/industrial development** adjacent to major

highways.

- **Ignores residents' clear priority to maintain scenic vistas** along these corridors.
- **Abandons guidance for future open pit gravel mines** by eliminating requirements for what must be included in applicants' master site development plans.
 - **Facilitates complementary industrial activities** to locate adjacent to gravel pits.
 - Encourages reclamation to other industrial uses.

Overall, we feel that **the MDP lacks consistency**. It “talks the talk” of rational land use planning; but **fails to “walk the walk”**. Instead, **its policies reflect the develop-at-any-cost preferences of the council majority and their supporters in the development community**. The MDP's significantly looser rules and more permissive oversight should bring cheer to these private interests. Unfortunately, the same cannot be said for the people who actually live in Rocky View.

From: [Michelle Mitton](#)
To: [PlanningAdmin Shared](#)
Subject: FW: [EXTERNAL] - MDP Municipal Development Plan February 16, 2021
Date: February 2, 2021 11:47:59 AM

MICHELLE MITTON, M.Sc

Legislative Coordinator – Legislative Services

ROCKY VIEW COUNTY

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From: james thomson

Sent: Tuesday, February 2, 2021 11:18 AM

To: Legislative Services Shared ; Public Hearings Shared

Subject: [EXTERNAL] - MDP Municipal Development Plan February 16, 2021

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From: James Thomson S11 T23 R27 W4

I am opposed to the adoption of the proposed MDP. This is a vital document and needs real in person presentation and further and fuller distribution for review. Further it needs a real in person public hearing. The MDP must wait until late this year or next to allow for this.

Of specific concern is the very broad brush of the "ecological features" in the land use map. Land owners did not ask for this. Who suggested this and why ? The rationale for this needs to be transparently and actively explained. It has not been. These ecological features can be a trojan horse to restrict vast amounts of this County over time. Council and staff's duty is to represent land owners interest and not to allow or promote a stealth caveat on lands without rigorous disclosure. Land ownership is a core financial, historical and cultural basis of this County !

If Council or staff suggest the ecological features are not something that is substantive then there is every reason to exclude them. If there is insistence to include them then obviously they are substantive and my comments above are very very relevant.

Sincerely, James Thomson S11 T23 R27 W4



Steven Lancashire

From: Michelle Mitton
Sent: January 28, 2021 11:30 AM
To: Dominic Kazmierczak
Subject: FW: [EXTERNAL] - SERIOUS CONCERNS with Bylaw C-8090-2020

MICHELLE MITTON, M.Sc
Legislative Coordinator | Legislative Services

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From: Katchmer, Jason [REDACTED]
Sent: January 28, 2021 9:02 AM
To: Legislative Services Shared <LegislativeServices@rockyview.ca>
Subject: [EXTERNAL] - SERIOUS CONCERNS with Bylaw C-8090-2020

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Hello,

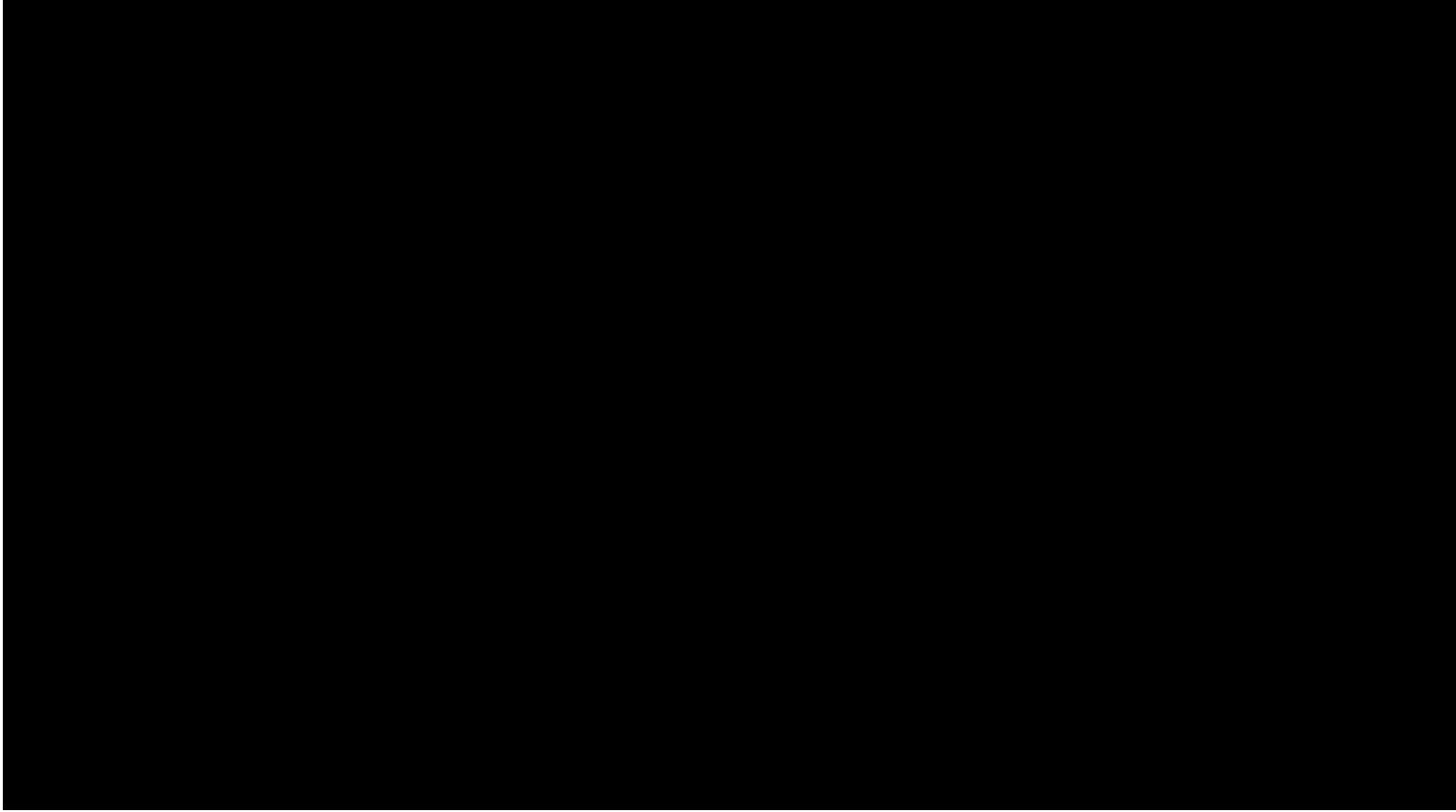
I have SERIOUS CONCERNS with Bylaw C-8090-2020 and the proposed new Municipal Development Plan for RVC. Specifically:

- Gravel pits are not an appropriate land use within any established country residential developments due to the many PROVEN health and safety concerns for residents
- Gravel pits require a stand-alone policy (ARP) and not integrated within the proposed MDP
- Policy needs to be put in place to carefully limit any adjacent industrial activity to gravel pits to protect landowners and the environment
- Policy needs to be put in place with strict guidelines on gravel pit reclamation to protect landowners and the environment
- Analysis of the true economic benefit to the county once the damage from heavy trucks to county roads is factored in

RVC council needs to listen to taxpayers who elected them as they work for the people. I trust my comments will be listened to and carefully considered.

Sincerely,

Jason Katchmer
40 Bearspaw Acres



From: [Michelle Mitton](#)
To: [PlanningAdmin Shared](#)
Subject: FW: [EXTERNAL] - Subject: Rocky View Council - Bylaw C-8090-2020
Date: February 2, 2021 5:32:58 PM

MICHELLE MITTON, M.Sc

Legislative Coordinator – Legislative Services

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From: KATHRYN WINTER

Sent: Tuesday, February 2, 2021 5:20 PM

To: Legislative Services Shared

Subject: [EXTERNAL] - Subject: Rocky View Council - Bylaw C-8090-2020

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February 2, 2021

My input on draft 4 of the Municipal Development Plan.

I am opposed to the subject draft of the MDP for the following reasons:

1. The MDP is too flexible. Please change the use of the word "should" back to "shall" in approximately 25 policies. The plan lacks enforceable standards.
2. The MDP does not specifically protect the Elbow River Aquifer from development. The Elbow River is an extremely important source of water to many Albertans. There should be no further development on or adjacent to the Elbow Aquifer. Please make this important change.
3. We do not need or want urban development in rural Rocky View.
4. Allow for public consultation and feedback on draft 5 of the MDP after the February 16 hearing.

Thank you for your consideration of my comments.

Kathryn Winter

Bragg Creek, AB resident

Steven Lancashire

From: Michelle Mitton
Sent: January 28, 2021 5:37 PM
To: Dominic Kazmierczak
Subject: FW: [EXTERNAL] - C-8090-2020

MICHELLE MITTON, M.Sc
Legislative Coordinator | Legislative Services

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From: Keith Koebisch [REDACTED]
Sent: January 28, 2021 4:08 PM
To: Legislative Services Shared <LegislativeServices@rockyview.ca>
Cc: 'Keith Koebisch' [REDACTED]
Subject: [EXTERNAL] - C-8090-2020

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Keith Koebisch
271-011 Range Rd. 40
RVC

Please consider this my written response to Public Hearing for new MDP C-8090-2020

To whom it concerns;

I am clearly not in support of the new MDP as proposed. Firstly, I believe there was nothing wrong with the existing County Plan and that this was a big waste of taxpayer's dollars. It also demonstrates a complete lack of empathy to be conducting Public Hearings during the peak of a prolonged Public Emergency! The county is clearly out of touch with its public.

I have taken part in the public consultation process via online and public workshops and have a great deal of concern in whether you have listened to what you heard. This County has a long track record of not following the directions and advice they consult the public on. A good example of this might be the ARP. Broken promises and not listening was the norm and in the end money wasted during the process and still being wasted in court that the County has to date lost.

The information you have on the County Website indicates that you expect the county will grow by at least 15,000 within 20 years and this is largely why we need a MDP, to better manage the various ASPs.

Is it not more accurate to state that the region wants to limit RVCs growth to only 15,000 within 20 years? Could it be that the county has already planned to exceed that limit? If I add the total grow projections of all the future ASP the county has already approved and those scheduled for Public Hearings they far exceed the 15,000 growth the county will be allocated. The error is not small, but off by multiples of the 15,000. We have already planned for exceeding the limit so what is really at issue?

If we examine a topic I know something about and have a special interest in, like the gravel industry for example, I see huge concerns and problems with the MDP. Under the proposed MDP a MSDP would be required of a new gravel pit but there is nothing to say what that MSDP must contain and to what detail and accuracy. We do not have an ARP so we have no provisions for cumulative effects, climate change, setbacks, reclamation or a host of other things. We have nobody at the county that is adequately qualified in specialties like hydrology, traffic, air, noise, geology, terrestrial and aquatic biospheres etc. etc. Are we to believe that the one or two civil engineers at the County are expert in everything? The vetting process is not at all reasonable. An example that DID SLIP THROUGH would be not knowing the correct watershed in a hydrology study or omitting significant "species at risk" in a listing of biota. MSDP must have prescribed details and not just referring to "standards of practice". If we went by those of the ASAGA nearly all pits in this province would FAIL!!!! Drive to Medicine Hat and show me one berm around a gravel pit or one that doesn't operate during strong winds.

The MSP would only ask for example, that when reclaiming the land that it should be of agricultural or better. The word "better" is left to one's imagination and interpretation. It could be housing or businesses supportive of more gravel pits. This does not sit well with existing landowner/residents. Arguing that the industry pays a CAP is nonsense when that fee doesn't come close to covering the destruction of our roads on haul routes. That they might be Provincial roads and not county owned is equally stupid. There is only one taxpayer and most of them can't write it off, as is the case for those companies.

Lastly, this proposed MDP is written in wishy-washy language that allows huge room for moment that will only be exploited by industry, developers and our own administrators. Above all you should respect the rights we have for the use and enjoyment of our homes as mandated in the Municipal Act. I do not see this helping the average County resident.....the hard working Albertans that built this province don't want to just hand over everything to the highest bidder to do whatever. Where are the Planners or were they all fired and replaced with "yes men"? The MDP would be heavily weighted in favour of any businessman fly by nighter. This is not what you heard from the people you asked to help shape the future. You confuse us, with Elon Musk, that will ruin the planet and move to Mars.

Sincerely Submitted,

Keith Koebisch

From: [Michelle Mitton](#)
To: [PlanningAdmin Shared](#)
Subject: FW: [EXTERNAL] - Draft 4 of the Municipal Development Plan (MDP)
Date: February 3, 2021 11:23:38 AM

MICHELLE MITTON, M.Sc

Legislative Coordinator – Legislative Services

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Phone: 403-520- 1290 |

MMitton@rockyview.ca | www.rockyview.ca

From: Kelly Wood

Sent: Tuesday, February 2, 2021 7:36 PM

To: Legislative Services Shared

Subject: [EXTERNAL] - Draft 4 of the Municipal Development Plan (MDP)

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February 2, 2021

Legislative Services

262075 Rocky View Point

Rocky View County, AB, T4A 0X2

legislativeservices@rockyview.ca

Re: Draft 4 of the Municipal Development Plan (MDP)

The proposed Municipal Development Plan (MDP) differs substantially from the existing County Plan in a number of ways that I feel are negative.

Not only does agriculture appear to no longer be important, but the interests of developers seem to be taking precedence over residential needs and the rural nature of the County. I understand that Rocky View is part of a larger corporation, the Calgary Metropolitan Region Board (CMRB), and the objectives of that organization seem to be taking precedence over the desires of the residents of Rocky View. Feedback from our residents has consistently stated that they want to retain the rural character of the County. If we wanted to live in an urban setting, we would move to one.

In particular, I am not in favour of increasing density. The population growth projections don't support the number of residences that are being proposed. The 2016 Residential Land Inventory concluded that there were between 20 – 200+ years inventory in already approved ASPs. Given this, what rationale does the MDP use to propose adding new primary growth areas?

If existing commercial/industrial growth areas are far from built out, why are so many new ones being added?

Removing restrictions on commercial/industrial development adjacent to major highways also ignores residents' clear priority to maintain scenic vistas along these corridors.

Any future development (within existing ASPs) must be at the developer's expense; this includes any required infrastructure and utilities. Existing homeowners and business owners should not be responsible for these costs.

The Elbow River alluvial aquifer is not specifically protected and thus vulnerable to the negative impacts of development. It needs to be specifically protected given the importance of the Elbow River for water supply.

In conclusion, I am opposed to Draft 4 of the MDP.

Thank you for your consideration.

Kelly Wood

[REDACTED]

Bragg Creek, AB T0L 0K0

[REDACTED]

ROCKY VIEW COUNTY MDP COMMENTS --- Kim Magnuson

Overall, this is not a resident-friendly Plan.

Has Admin advised Council yet on how much acreage in RVC is Business/Commercial /Industrial?

There are too Many “Shoulds” rather than “Shalls”. Ultimately, this weak wording absolves developers of responsibility.

Has the County’s targeted 65:35 ratio of residential to business development been met? Where are we at?

2016 Residential Land Inventory identifies:

- **An abundance of approved residential lots not built – 11,412**
- **ASP’s show 37,177 potential new dwellings**
- **Conceptual Schemes show 10,071 potential new dwellings**
- **Numbers that don’t include lots outside of ASP’s and CS’s**
- **Average of 342 new dwellings/year since 1995.**
- **Less than 300 new dwellings/year built in 2015**
- *****This study is 5 years old, and should have been re-done prior to this MDP to get more up-to-date data.**

As the MDP is a 20-Year Plan, the Council needs to focus on the residential lots that have been already approved and direct growth towards those vacant lots rather than approving more residential lots.

Section 2: Land Use Policies

“If not managed properly this growth pressure can result in dispersed development that negatively impacts other land uses, including farming, ranching, and existing residential development. Agricultural operations, for example, can become less productive or unviable if fragmented by residential and commercial development. Additional exurban development may also lower the quality of life for existing residents by eroding the rural character of areas or adding greater pressure on existing infrastructure and municipal services.” P. 12

“As identified in the Growth Concept (Section 2.2), new residential, commercial, and industrial growth is primarily directed to existing and planned growth areas. By focusing growth in these areas, Rocky View establishes certainty for residents and the development community as to where growth should be expected. Prioritizing growth in existing and planned areas also allows the County to leverage municipal investments in servicing and transportation infrastructure, generating growth that is fiscally responsible.” P. 12

Given that RVC has more than an abundance of approved residential lots/potential dwellings, it seems logical that no new lots need to be created for 38 years. It would be considered smart planning to direct new growth to areas that are already approved.

2.1 Population and Housing Trends

The Calgary Metropolitan Region Board projects that Rocky View County will continue to grow, increasing from a population of 42,424 in 2018 to just over 60,000 by 2040.
P. 12

Even by CMRB projections, that would be only 17,576 new residents in RVC by 2040. If we estimate 3 persons/house, that means only 5,858 houses are necessary for the population increase, wherever they may be.

The newly developing communities of Glenbow Ranch and Harmony in the County's western half are examples of these denser and more connected community villages.
P. 13

Harmony has an excellent start on planning, building and having necessary infrastructure but Glenbow Ranch has not. Glenbow's ASP also is not identified in the Interim Growth Plan Map (it is an Unincorporated Urban Community), so should be removed as a Growth Area, as should the proposed Elbow View West ASP and Elbow View ASP on Highway 8, that don't appear on the map of Schedule 1, P. 21 of the IGP. They can remain as approved ASP's for future use.

2.2 Growth Areas

The Growth Concept Plan identifies the priority areas within the County for the continued growth and expansion of residential, commercial, and industrial land uses. New development may occur outside of the identified priority growth areas, however, with Council review and approval. P. 13

As noted above, there is an over-abundance of approved housing already in RVC, so Council does not need to review or approve new development.

2.3 Residential Development

It is important to plan for residential development that respects the values of County residents while balancing the need to grow responsibly.

It is pretty clear from the Engagement Sessions that Rocky View residents aren't interested in yet more development..

Their Values - 1. Rural Lifestyle 2. Peace and Quiet, and 3. Natural Landscape.

Their Priorities - 1. Protect Rocky View County's natural landscape 2. Preserve agricultural lands 3. Focus growth in existing and planned hamlets 4. Expand the network of parks and trails across the County.

Their Visions - 1. Controlled + Focused Growth 2. Maintain the Rural Character 3. Preserve Natural Environment + Wildlife.
Contentious Areas – Highway 1A, Highway 1 West, Highway 8

Please do not make the mistake of not listening to the majority.

In Phase 1, Direction for the MDP was:

Controlling and focusing growth according to plans should be a key consideration going forward. Similarly, the desire to protect the rural landscape and character that make Rocky View County what it is should be reflected throughout the MDP project. There is little desire for new growth areas, and many feel that new growth should be concentrated, rather than spread out, with adequate infrastructure and servicing to support new development. P. 20

This draft MDP does nothing to reassure residents that their opinions, values, visions, priorities or values matter. In fact, the Draft after Phase 1 bore little resemblance to what residents said. Their number 1 comment in Phase 2 was that RVC needs to manage land development and growth.

This MDP does not do that, but rather, it presents as a free-for-all.

2.3 Residential Development Objectives

*Residential land uses are the primary form of development in Rocky View County. It is important to plan for residential development that respects the values of County residents while balancing the need to grow responsibly. The policies contained in this section reflect this balance and provide a framework that will guide residential development in the County for the **next 20 years**. P. 17*

This statement says it all. 20 years worth of residential development (that has already been approved) can and should occur in areas that are already approved: Harmony, Bragg Creek, Langdon, Cochrane Lake, Conrich, etc.

New development may occur outside of identified priority growth areas with Council review and approval. P. 17

This section should be removed. If Council's goal is to direct new growth to areas that can absorb another 20 years of growth, no other growth areas need to be approved. This would fall into line with the Interim Growth Plan and subsequent CMRB Growth Plan.

Applications to redesignate land for multi-lot residential use adjacent to or in the vicinity of Primary Residential Areas should not be supported unless the proposed development area is approved as an amendment to hamlet boundaries or applicable area structure plans or conceptual schemes. PP 17- 18

This section should also be removed. As above, there is no need for Rocky View to approve more areas or to expand existing growth areas, as there is already more than enough residential growth approved.

It is important to plan for residential development that respects the values of County residents while balancing the need to grow responsibly. P 17

Yet,

Alternative residential development forms that reduce the overall development footprint are pursued....New development may occur outside of identified priority growth areas with Council review and approval....The County should develop or expand area structure plans or conceptual schemes for Primary Residential Areas not currently covered by these plans....Provides for the distribution and varied densities of dwelling units within portions of the development area". P. 17-18

These two statements contradict each other. The values of County residents was noted above and extremely few residents are in favour of more growth areas.

2.3.2 Country Residential Development

Country residential development, with two or more dwelling units, is discouraged outside of Primary Residential Areas, including in agriculture areas.

When an existing area structure plan that includes country residential development is undergoing a comprehensive review, the following shall be addressed:

- i) Update all policies in accordance with the MDP, County policies, and other relevant County planning documents;*
- ii) Consider the inclusion of alternative development forms, such as compact residential development or a conservation design community, which reduce the overall development footprint on the landscape; and*
- iii) Where country residential development is not being achieved as expected, the County should consider reducing the overall area dedicated to country residential development. P. 19*

It appears that 2 + acre lots are to be a thing of the past when it comes to new development. Such exclusivity greatly undermines RVC's stated goal of providing a variety of housing choices in a rural municipality.

RE: Interim Growth Plan: 3.4.4 Country Residential Development New country residential development areas, cluster country residential development, and intensification and infill of existing country residential areas with 50 new dwelling units or greater shall be planned and developed in accordance with the Region-wide (Section 3.2), Flood Prone Areas (Section 3.3) and Regional Corridors (Section 3.5) policies. **P 16**

The Interim Growth Plan does NOT exclude new country residential acreages. Why does the MDP exclude them or make it difficult to create more?

2.3.3 Fragmented Country Residential Development

Within a fragmented quarter section, the redesignation of residential lots or agricultural parcels less than or equal to 4 hectares (9.9 acres) in size to a new residential land use may be supported if planning, consultation, and technical assessment information is provided to the satisfaction of the County. P. 20

What is the rationale for this? Such a request for a small number of acres is onerous for the landowner.

2.4 Employment Area Development

The MDP supports and encourages a robust market-driven economy by facilitating economic development and providing planning policies that help foster private and public investment across the county. P. 21

This reads like a prescriptive economic development plan and doesn't belong in the MDP. It appears that the County is prepared to allow industrial/commercial/business ventures on large swaths of land just outside Calgary, which doesn't align with the goal of cooperation in the Interim Growth Plan.

Rocky View has several ASPs lined up – Glenmore Trail, Janet, Shepard, Conrich, Highway 1 East, Omni, Balzac – that would be suitable for such business. Springbank is predominantly residential and does not need to be included in this list.

***Has Administration provided Council with the amount of land that has been designated as industrial/commercial/business yet?

An increased business assessment base supports the financial sustainability of the County's operations while reducing reliance on the residential tax base. P. 21

Does anyone know what the assessment split is today? Is it 65/35?

2.4.2 Neighbourhood Serving Commercial

Commercial and light industrial development in appropriate locations contributes to the viability of Primary Residential Areas by providing social and community meeting places, enabling employment opportunities, and offering goods and services to the local area. Encourage the infilling or intensification of existing neighbourhood serving commercial areas. P. 23

This is such a contradictory statement. Residential areas have preceded commercial and light industrial in almost all sectors of Rocky View, including Langdon with a population of over 6000. The viability of residential areas does not depend upon commercial development.

This might be believable if we didn't live next to a city of 1.2 million which is within 45 minutes of every part of RVC.

Home based business shall be supported, as a self-employment opportunity for residents, and when they are in accordance with the applicable area structure plan, subordinate plan, and/or the Land Use Bylaw. P. 23

This is mostly reasonable and acceptable to most and it makes sense to allow residents to apply for Home-based businesses – in the area in which they **want** to live.

2.5 Hamlet Growth Areas

*Rocky View's hamlets are home to the **majority** of the County's residents and provide services for the everyday needs. P. 24*

This is not true and should be amended to read 25% of residents live in hamlets. As well, **very few** services are available in these hamlets.
Langdon 6000, Bragg Creek 525, Harmony 250 = less than 7000 residents out of 40,000.

Hamlets should be the priority for residential development over the next 20 years, and their continued attractiveness as a place to live in Rocky View County will be predicated upon continued support for contextually sensitive commercial development, the provision of appropriate open spaces, and a range of housing options to support all types of households. P. 24

*****. As these areas have not been fully developed, they are able to accommodate additional growth over the next 20 years.**

This is true. And since it is true, then RVC does not need to keep approving residential/commercial/business in a variety of other places. Industrial doesn't belong within any residential area.

Of these hamlets, Balzac West, Bragg Creek, Conrich, Elbow View, Glenbow, Harmony, and Langdon are recognized as Hamlet Growth Areas (as identified on Figure 2). P. 24

Elbow View has not been approved. Only Harmony, Langdon, Balzac West, Glenbow, and Bragg Creek are identified in the Interim Growth Plan as hamlets.

3.1 Financial Sustainability

For Rocky View County to be financially sustainable, development should pay for itself and be affordable over the long term. This reduces financial risk to County ratepayers and mitigates potential economic risks. P. 28

3.1.1 Policies: New development should be directed to areas with existing infrastructure, where feasible. P. 28

On-site and off-site hard infrastructure costs related to new development shall be the responsibility of developer. P. 28

Where deemed appropriate the County may require developers to build or contribute to the building of soft infrastructure (e.g. recreation amenities, libraries, schools). Soft infrastructure needs resulting from growth should be identified and methods to finance those needs prepared in advance of new development. PP.28-29

I agree on all points, but Rocky View needs to make sure that infrastructure costs and levies are fully covering costs so that we don't drain the Reserve Fund!

3.3 Natural Resource Development

Objectives: Minimize the adverse impact of aggregate resource extraction on existing residents, adjacent land uses, and the environment. P. 31

Encourage collaboration between the County, the aggregate extraction industry, and impacted residents and landowners to develop mutually agreeable solutions that mitigate impacts of extraction activities. P 31

It does not appear as though residential concern is very strongly considered when Council approves aggregate extraction, for example in Bears paw. How many acres does RVC presently have in operation? Is it necessary to approve every application that comes forward at this time?

3.4 Agriculture

While the MDP recognizes agriculture as vital to the County's economy and cultural identity, diversification and innovation within the sector will become increasingly important to build a thriving economy and additional employment opportunities. P. 32

Support the viability and flexibility of the agriculture sector by allowing a range of parcel sizes, where appropriate. P. 32

These statements are oxymorons because one cannot both value the industry while encouraging its flexibility through its fragmentation. Exactly what does this mean? Perhaps diversified ag operations should be required to locate on already-fragmented land.

3.5 Environment

County residents have a strong connection to the natural environment and value the County's waterways, natural areas, and parks. However, as residential, commercial, and industrial development continues, the impact on the environment increases. P.34

Wildlife corridors along the Elbow River and on the escarpment in Springbank will definitely be negatively impacted with high density development proposed on Hwy 8 and east of RR 32 to the city limits where there is heavy tree cover. What is the plan for mitigating human/animal contact in these areas besides completely driving the wildlife away? This is not addressed.

3.6.3 Wastewater Management

*Traditionally, the County has relied on standalone utility systems, such as groundwater wells and septic fields. As development intensifies, however, piped methods of servicing **will become necessary** in certain areas. The need to design stormwater management systems to consider catchment areas beyond a site-specific solution has become increasingly important and should be facilitated by master planning.*

*Well-designed and effective utility services are key components of well-planned developments. Utility systems must be designed and constructed in a manner that is safe and reliable, **while not adversely impact neighbouring lands**.*

***Allow a variety** of water, wastewater, and stormwater treatment systems, in accordance with provincial/federal regulations and the County Servicing Standards. P. 37- 38*

Off-site impacts of dense development cannot occur. If cluster residential is going to have its own communal system for treated **wastewater**, what is the plan for ensuring the land's carrying capacity after building is complete? Everyone with a septic field knows that septic fields can and do fail. Will there be an adequate amount of land set aside for a second, or even third, field? Will this affect the number of acres that is deemed public? Allowing a "variety" of systems does not make good environmental sense; there should be a stringent County standard for one type of system, not a variety. Does the HOA take financial and legal responsibility for failure of any septic fields? Does Rocky View eventually take over the operation of every system?

3.6.4 Stormwater Management

To achieve consistency in wastewater management systems, the County may negotiate public ownership of existing private approvals and infrastructure in cases where it is fiscally prudent to do so, the existing system meets regulatory standards, and the existing system is in good operating order. P. 38

Does this mean that if systems aren't up to standards or in good working order that the County leaves responsibility up to HOA's? What type of enforcement will be taken? The County needs to ensure that stormwater drainage does not just sit in ditches and create motionless marshes, as is the case on TWP 245 beside the Dens of Springbank.

3.8 Public Space

This topic speaks only to parks, open spaces, pathways, trails and other amenities on land. What type of action can the County take to include safe public access to both the Bow and Elbow Rivers?

From: [Michelle Mitton](#)
To: [PlanningAdmin Shared](#)
Subject: FW: [EXTERNAL] - Bylaw C-8090-2020
Date: February 3, 2021 12:47:38 PM

MICHELLE MITTON, M.SC
Legislative Coordinator – Legislative Services

ROCKY VIEW COUNTY
262075 Rocky View Point | Rocky View County | AB | T4A 0X2
Phone: 403-520- 1290 |
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-----Original Message-----

From: Margit McGrath [REDACTED]
Sent: Wednesday, February 3, 2021 12:42 PM
To: Legislative Services Shared <LegislativeServices@rockyview.ca>
Subject: [EXTERNAL] - Bylaw C-8090-2020

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Hi -

I am writing in order to provide feedback on this municipal development plan. Specifically, I have concerns about section 3.3.1.

I would like to see the list of technical studies reinstated that would be required for aggregate site development plans.

Section 3.3.1(c) should discourage future aggregate extraction in locations near residential development.

Section 3.3.1(g) and 3.3.1(h) should be removed.

Natural resource development is not an important contributor to the local economy - the county receives minimal revenue compared to other uses, and most of the jobs get filled by nearby urban residents. The gravel company benefits, and Rocky View County residents and our environment pay the price.

I also think it would be appropriate to extend the feedback period for this MDP given many Rocky View County residents are currently focused on the Lehigh Hanson Scott Property application - I think many more residents would offer feedback if the deadline were to be extended.

Thanks

Margit McGrath

Rocky View County resident

19, Alexa Close,
Rocky View County,
Alberta
T3R 1B9

February 3, 2021

Rocky View County,
262075, Rocky View Point,
Rocky View County,
Alberta
T4A 0X2

Subject: Bylaw C-8090-2020

To: Rocky View Council

Given the issues we are currently experiencing with the Lehigh Hanson Scott Pit application I naturally have serious concerns with the changes in aggregate policy that are being proposed in the Municipal Development Plan (MDP). I believe the proposed changes severely reduce of the guidance provided in the current County Plan.

First of all, why is the County's natural resource policy no longer part of its overall land use policies? The land uses in that section deal with residential, commercial, industrial, and institutional land use policies. These all apply to their respective land uses across the County just as do the policies for natural resource development.

Introductory Paragraph to Section 3.3

I certainly object to the underlying assumption in the introduction to the Natural Resources section. Contrary to the MDP's assertion, natural resource development is **not** an "important contributor to the local economy". As was highlighted in the Lehigh Hanson Scott Pit application Letters of Objection, in particular the submission by John Weatherill, an independent, unbiased, qualified Economics expert opinion showed that gravel is **NOT** important to the regional economy. Indeed, it is a source of considerable cost to the County and its tax paying residents (when full costs are actually included in a Cost-Benefit analysis). The County receives minimal revenue from any natural resource development and many, if not most, of the employment opportunities generated by natural resource activities in the County are filled by residents from outside the County.

The only significant revenue the County receives from aggregate resource development is the Community Aggregate Payment levy. The CAP levy, even at its increased rate, does not come close to covering the costs of damage to the roads caused by heavy gravel trucks.

RVC needs to "step up to the plate" and recognize its important role in ensuring that aggregate development in RVC is undertaken in a responsible manner that protects both the County's residents and its environment.

The introduction recognizes that resource extraction requires “careful consideration for how extraction is planned and implemented” because of the significant impacts it has on adjacent land uses and the environment. These statements are of critical importance. With Council’s earlier decision to cease work on a stand-alone aggregate resource plan, the guidance to ensure that this “careful consideration” is achieved must be provided in the MDP. However, the MDP’s policies are completely inadequate to ensure that the acknowledged “community concerns” and “significant impacts” from resource extraction are addressed.

Objectives

The existing County Plan’s first goal for natural resource development was that natural resources should be extracted “in a manner that balances the needs of residents, industry, and society”. The MDP proposes to change this wording to balancing “the needs of residents, industry, and the County”.

What happened to society? The changed wording is much more inward looking and devalues the broader societal worth of environmental protection.

The second goal in the County Plan was to support “environmentally responsible management and extraction of natural resources”. The MDP proposes only to have the “negative impacts on the environment” mitigated. What happened to being environmentally responsible?

Section 3.3.1 – Aggregate Extraction Policies

The policies in this section, with the exceptions noted below, are appropriate motherhood statements. Unfortunately, as has been demonstrated repeatedly as various open pit gravel mining applications have come before Rocky View’s councils, more than platitudes are needed.

If the County genuinely wants to find the balance that protects its residents and its environment while permitting responsible aggregate extraction, far more specific guidance is required and the guidance that had been provided in the County Plan must be reinstated.

Policy 3.3.1 (a) states that the adverse impacts should be minimized for existing residents, adjacent land uses and the environment. That is appropriate. However, without detail on how to determine effective mitigation it becomes a meaningless box-ticking exercise when aggregate companies come forward with open pit gravel mine applications. (Lehigh Hanson Scott Pit application is a perfect example of this)

Policy 3.3.1 (b) encourages collaboration between the County, residents, and industry to develop mutually agreeable solutions. Again, without any detail or commitment from the County, this is a meaningless platitude. (Again Lehigh Hanson (LH) Scott Pit application is a perfect example of this. LH did not have a clue on any collaboration or accommodation with residents. The concept was completely beyond their understanding).

If the County is actually committed to encouraging the collaboration described in this policy, it needs to take an active role in engaging residents and adjacent landowners to identify possible solutions to mitigate the unavoidable negative impacts from aggregate extraction. Residents all

understand that aggregate extraction is necessary. We simply look for it to be done in a responsible manner that does not impose unnecessary costs and damage.

For a start, the County could demonstrate its commitment to this policy by ensuring that residents' input is reviewed and incorporated by Administration as staff assess gravel company applications. Rocky View residents possess a tremendous wealth of relevant expertise on natural resource extraction issues. It is foolhardy to dismiss all that expertise and simply file it away unread and unused. (Again, Lehigh Hanson Scott Pit application is a perfect example of this. Administrations dismissal of resident input, including independent, unbiased, qualified expert opinions, that were superior to the paid consultants, paid for by the applicant was insulting and indeed a great loss of expert information to administration).

Policy 3.3.1 (c) discourages residential development that may be impacted by future aggregate extraction. Where is the parallel policy that discourages future aggregate extraction in locations that may impact existing residential development?

If the County is committed to Policies 3.3.1(a) and (b) both sides need to be included in Policy 3.3.1 (c) to acknowledge the reality that residential development and heavy industrial open pit gravel mining are completely incompatible land uses.

At an absolute bare minimum, the MDP needs to provide guidance for where "future aggregate" locations are to be determined. Rocky View has some of the most generous aggregate deposits in North America, without such guidance, this policy could potentially limit non-aggregate development in most of the County. I assume that is not actually the County's intention.

Policy 3.3.1 (f) requires that aggregate extraction applications must prepare a master site development plan. This policy is where the MDP fails County residents and future councils most dramatically, especially in comparison to the current County Plan. The MDP eliminates the list of technical studies that are required as part of master site development plans. WHY?

The County Plan recognized the complexities involved in decision-making regarding aggregate operations. To address that, it directed Administration to prepare a stand-alone policy to provide the detailed guidance needed by all parties. This Council killed that initiative and has taken no positive steps to replace it. Now, Policy 3.3.1 (f) removes the stopgap guidance the County Plan provided before its anticipated aggregate resource plan was developed.

What possible rationale is there to remove the County Plan's appendix that lists the technical studies required in support of any aggregate extraction application? How will councils ensure that residents and the environment are protected as they make decisions on future aggregate applications if there are not even a consistent set of technical reports to assess these applications?

Policy 3.3.1(g) encourages the location of complimentary industrial activity adjacent to aggregate operations. This policy is extremely troubling.

The MDP provides no guidance on where it is appropriate to locate open pit gravel mines. Given this serious failing, how can the MDP possibly conclude that it is appropriate to locate other

industrial uses adjacent to these operations? This opens the door for additional industrial activity in residential communities simply because there is a gravel pit nearby. This is completely unacceptable.

Policy 3.3.1 (h) directs future councils and aggregate companies to consider transitioning gravel pits into alternative industrial uses once gravel extraction has finished. Although proposed amendments to the 1st reading MDP will remove the examples of waste transfer and processing facilities, these remain active alternatives given the policy's wording.

One of the justifications the County has always used to permit gravel pits in otherwise highly incompatible locations is that they are a temporary use. Although 25 – 50-year aggregate operations are far from most peoples' definition of "temporary", at least there is a long-range hope that former gravel pits will, someday, be reclaimed to their original state.

Current provincial legislation and previous county policy assume that gravel pits will be reclaimed back to their original use (usually agricultural), unless a case can be made that there is a higher value post-reclamation use. This policy is a dramatic departure from this longstanding approach to aggregate operations. It is not clear how or why the MDP has chosen to deviate from provincial guidelines in this area.

Conclusions

The MDP, as currently drafted, sends a strong message to residents that the County no longer cares about them or their environment when it comes to dealing with the many unavoidable negative impacts that accompany aggregate operations.

If that is not the intended message, Council must, as a bare minimum, amend the MDP in the following manner:

- Reinstate the list of technical studies required for all aggregate operations' master site development plans.
- Amend Policy 3.3.1(c) to provide parallel discouragement of future aggregate extraction in locations that may impact existing residential development.
- Remove Policies 3.3.1(g) and (h).

Council should consider the difficulties involving the current Lehigh Hanson application and public hearing. If there had been mutually acceptable guidelines for where aggregate operations should be located, and how they should operate, which could have been provided in a stand-alone aggregate policy would have made the Lehigh Hanson public hearing far simpler. In fact, logic would dictate should never have come before Council in the first place!

Sincerely,



Martyn Griggs

From: [Jessica Anderson](#)
To: [Steven Lancashire](#)
Subject: FW: [EXTERNAL] - objection to Springbank ASP's and MDP
Date: February 2, 2021 2:48:10 PM

Jessica Anderson
 Senior Planner | Planning Policy

From: Dunn [REDACTED]
Sent: February 2, 2021 2:46 PM
To: Jessica Anderson <JAnderson@rockyview.ca>; Dominic Kazmierczak <DKazmierczak@rockyview.ca>; Legislative Services Shared <LegislativeServices@rockyview.ca>; Michelle Mitton <MMitton@rockyview.ca>; kevin.hansen@rockyview.ca; Division 2, Kim McKylor <KMckylor@rockyview.ca>; Division 1, Mark Kamachi <MKamachi@rockyview.ca>; Division 4, Al Schule <ASchule@rockyview.ca>; Division 5, Jerry Gautreau <JGautreau@rockyview.ca>; gboehike@rockyview.ca; Division 7, Daniel Henn <DHenn@rockyview.ca>; Division 8, Samanntha Wright <SWright@rockyview.ca>; Division 9, Crystal Kissel <CKissel@rockyview.ca>
Cc: transportation.minister@gov.ab.ca
Subject: [EXTERNAL] - objection to Springbank ASP's and MDP

Do not open links or attachments unless sender and content are known.

Dear Rocky View Planning & Council Members,

As a long-term resident and constituent of the Springbank area, I am writing to present my and my family's strong objections to the changes being proposed for the below 3 plans. I feel we are speaking for North & South Springbank due to the new changes to the map taking parts of North Springbank south of Highway 1.

RE:
BYLAW C-8031-2020 North Springbank Area Structure Plan

BYLAW C-8064-2020 South Springbank Area Structure Plan

Municipal Development Plan Bylaw C-8090-2020

Plans should not be approved without prior demonstrated assurance of sufficient and adequate infrastructure, including water (potable water supply & wastewater treatment), transportation (traffic impacts & roads capacity), and rationalized sustainable limits to total development. Simply allowing multiple developers to plan independently is a disaster waiting to return to the County for resolution of future discrepancies or inadequacies, where the responsibility to rectify any problems will surely rest with RVC Council and its constituents (i.e., voters).

Critical issues include:

1. Proposed development plans indicate that no water or sewage plans or licenses have been approved. The ASP seems to indicate there will be water, but not how or from where, and taxpayers will pay for whatever water systems the developer chooses, but initially water & sewage can be trucked in? Plans refer to piped water from Harmony, but that license stipulates it is for Harmony alone. Water is already over-allocated in the Bow River basin and shortages will only increase as environmental and climate conditions change, even more so if SR1 goes ahead in the absence of a dam that can hold water for later use.
2. The existing “country residential” definition of 2 acres, seems to have been changed to 1 acre or smaller, with repeated areas of “cluster residential” of .5 acre. However the 2 acre minimum reflects a size that can be managed with on-site septic systems. A viable and sustainable system for treating wastewater should be required by Rocky View County prior to approval.
3. One of the proposed developments is a planned auto mall at 101st Street. That would be a huge water user and is sure to generate a huge amount of traffic on Old Banff Coach Road, as well as Springbank rd – significantly more traffic than at present with potential for even more accidents and casualties than are experienced on these roads currently. Also there is already a competitive auto mall, only 15 minutes north of this location, once Stoney Trail connects, which suggests that the future for the proposed development will be either non-viable by the time it is constructed, or it may be subject to obligations for RVC to mitigate negative economic impacts as a result of its approval.
4. This piece of land at 101st has a deep natural gully, not a flat area, so is unsuitable for intensive development without considerable landfill and disruptions to overland stormwater flow and wildlife passage. It is a major wildlife corridor, used continuously by many animals large and small. Auto malls are known to be huge water consumers, yet there are no water licences for this area & the water table is deep as well as in short supply, not to mention that no new water licenses are available in all of the South Saskatchewan River basin.
5. These development plans will significantly increase the traffic on Old Banff Coach Road. Old Banff Coach Road has been drawn on some of these plans as having four (4) lanes, even with signalized traffic lights. It is a narrow historic highway, already carrying far more traffic than it was designed for and prone to repeated accidents due to difficult curves, with many hidden driveways and connecting roads. It is also frequently used to detour highway traffic following accidents on Highway 1. A comprehensive traffic impact assessment should be required before permitting any expansion of this road, as well as a guarantee that Rocky View County and its residents will not be on the hook for financing any road improvements, mitigations or remediation measures now or at any time in the future. Further, any approval by RVC of land developments that will impact areas of provincial jurisdiction (i.e., Old Banff Coach Road) should have prior agreement from the Ministry of Transportation, Government of Alberta.

I implore you: Do not approve these plan changes at council on Feb 16, 2021.
thank-you for your consideration. I will be pleased to participate in additional
community engagement as planning for the Springbank area progresses.

Sincerely,

Moire & Jeff Dunn

213 Artists View Way

From: [Michelle Mitton](#)
To: [PlanningAdmin Shared](#)
Subject: FW: [EXTERNAL] - Bylaw C-8082-2020
Date: February 3, 2021 1:45:43 PM

MICHELLE MITTON, M.Sc

Legislative Coordinator – Legislative Services

ROCKY VIEW COUNTY

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Phone: 403-520- 1290 |

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From: P K SCHULDHAUS
Sent: Wednesday, February 3, 2021 1:44 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Bylaw C-8082-2020

Do not open links or attachments unless sender and content are known.

Dear Sir/Madam,

I would like to comment on the proposed provisions in Section 3.3 of the new Municipal Development Plan (MDP) that apply to aggregate operations in RVC. I will reserve comments on the remaining areas of the MDP as I expect those will be addressed by others.

I have serious concerns with the changes in aggregate policy that are being proposed in the MDP. The changes are a severe scaling-back of the guidance provided in the current County Plan.

From a basic organizational perspective, it is completely unclear why Rocky View County's ("RVC") natural resource policy will no longer be part of its overall land use policies. The land uses in that section deal with residential, commercial, industrial, and institutional land use policies. These all apply to their respective land uses across the County just as do the policies for natural resource development.

Introductory Paragraph to Section 3.3

I have concerns and strongly object to the underlying assumption in the introduction to the Natural Resources section. Contrary to the MDP's assertion, natural resource development is not an "important contributor to the local economy". It is important to the regional economy and I acknowledge that. However, RVC receives minimal revenue from any natural resource development and many, if not most, of the employment opportunities generated by natural resource activities in RVC are filled by residents of our urban neighbours; in particular Calgary

The only significant revenue RVC receives from aggregate resource development is the Community Aggregate Payment levy. The CAP levy, even at its increased rate, does not come close to covering the costs of damage to the roads caused by heavy gravel trucks.

RVC needs to acknowledge the "myth" associated with the opening statement. Maintaining this façade has resulted in RVC downplaying its important role in

ensuring that aggregate development in Rocky View is undertaken in a responsible manner that protects both the County's residents and its environment.

It has never been clear why RVC is willing to sacrifice its residents and its environment for the benefit of the broader region for minimal direct benefit to itself. It is not as if RVC receives any commensurate benefit from its regional neighbours on other issues in exchange.

The introduction recognizes that resource extraction requires "careful consideration for how extraction is planned and implemented" because of the significant impacts it has on adjacent land uses and the environment. These statements are of critical importance. With Council's earlier decision to cease work on a stand-alone aggregate resource plan, the guidance to ensure that this "careful consideration" is achieved must be provided in the MDP. Unfortunately, the MDP's policies are completely inadequate to ensure that the acknowledged "community concerns" and "significant impacts" from resource extraction are addressed.

Objectives

The existing County Plan's first goal for natural resource development was that natural resources should be extracted "in a manner that balances the needs of residents, industry, and society". The MDP proposes to change this wording to balancing "the needs of residents, industry, and the County".

What happened to society? The changed wording is much more inward looking and devalues the broader societal worth of environmental protection.

The second goal in the County Plan was to support "environmentally responsible management and extraction of natural resources". The MDP proposes only to have the "negative impacts on the environment" mitigated. What happened to being environmentally responsible?

Section 3.3.1 – Aggregate Extraction Policies

The actual policies in this section, with the exceptions noted below, are appropriate motherhood statements. Unfortunately, as has been demonstrated repeatedly as various open pit gravel mining applications have come before Rocky View's councils, more than platitudes are needed.

If RVC genuinely wants to find the balance that protects its residents and its environment while permitting responsible aggregate extraction, far more specific guidance is required and the guidance that had been provided in the County Plan must be reinstated.

Policy 3.3.1 (a) states that the adverse impacts should be minimized for existing residents, adjacent land uses and the environment. That is appropriate. However, without detail on how to determine effective mitigation it becomes a meaningless box-ticking exercise when aggregate companies come forward with open pit gravel mine applications.

Policy 3.3.1 (b) encourages collaboration between RVC, residents, and industry to develop mutually agreeable solutions. Again, without any detail or commitment from RVC, this is a meaningless platitude.

If RVC is actually committed to encouraging the collaboration described in this policy, it needs to take an active role in engaging residents and adjacent landowners to identify possible solutions to mitigate the unavoidable negative impacts from aggregate extraction. Residents all understand that aggregate extraction is necessary. We are simply looking for it to be done in a responsible manner that does not impose unnecessary costs and damage.

For a start, RVC could demonstrate its commitment to this policy by ensuring that residents' input is reviewed and incorporated by Administration as staff assess gravel company applications. Rocky View residents possess a tremendous wealth of relevant expertise on natural resource extraction issues. It is foolhardy to dismiss all that expertise and simply file it away unread and unused.

Policy 3.3.1 (c) discourages residential development that may be impacted by future aggregate extraction. Where is the parallel policy that discourages future aggregate extraction in locations that may impact existing residential development?

If RVC is committed to Policies 3.3.1(a) and (b) both sides need to be included in Policy 3.3.1 (c) to acknowledge the reality that residential development and heavy industrial open pit gravel mining are completely incompatible land uses.

At an absolute bare minimum, the MDP needs to provide guidance for how these "future aggregate" locations are to be determined. Given that Rocky View has some of the most generous aggregate deposits in North America, without such guidance, this policy could potentially limit non-aggregate development in most of RVC. We assume that is not actually the County's intention.

Policy 3.3.1 (f) requires that aggregate extraction applications must prepare a master site development plan. This policy is where the MDP fails County residents and future councils most dramatically, especially in comparison to the current County Plan. The MDP eliminates the list of technical studies that are required as part of master site development plans. WHY?

The County Plan recognized the complexities involved in decision-making regarding aggregate operations. To address that, it directed Administration to prepare a stand-alone policy to provide the detailed guidance needed by all parties. This Council killed that initiative and has taken no positive steps to replace it. Now, Policy 3.3.1 (f) removes the stopgap guidance the County Plan provided before its anticipated aggregate resource plan was developed.

What possible rationale is there to remove the County Plan's appendix that lists the technical studies required in support of any aggregate extraction application? How will councils ensure that residents and the environment are protected as they make decisions on future aggregate applications if there are not even a consistent set of technical reports to assess these applications?

Policy 3.3.1(g) encourages the location of complimentary industrial activity adjacent to aggregate operations. This policy is extremely troubling.

The MDP provides no guidance on where it is appropriate to locate open pit gravel mines. Given this serious failing, how can the MDP possibly conclude that it is appropriate to locate other industrial uses adjacent to these operations? This opens the door for additional industrial activity in residential communities simply because there is a gravel pit nearby. This is completely unacceptable.

Policy 3.3.1 (h) directs future councils and aggregate companies to consider transitioning gravel pits into alternative industrial uses once gravel extraction has finished. Although proposed amendments to the 1st reading MDP will remove the examples of waste transfer and processing facilities, these remain active alternatives given the policy's wording.

One of the justifications RVC has always used to permit gravel pits in otherwise highly incompatible locations is that they are a temporary use. Although 25 – 50-year aggregate operations are far from most peoples' definition of "temporary", at least

there is a long-range hope that former gravel pits will, someday, be reclaimed to their original state.

Current provincial legislation and previous county policy assume that gravel pits will be reclaimed back to their original use (usually agricultural), unless a case can be made that there is a higher value post-reclamation use. This policy is a dramatic departure from this longstanding approach to aggregate operations. It is not clear how or why the MDP has chosen to deviate from provincial guidelines in this area.

Conclusions

The MDP, as currently drafted, sends a strong message to residents that RVC no longer cares about them or their environment when it comes to dealing with the many unavoidable negative impacts that accompany aggregate operations.

If that is not the intended message, Council must, as a bare minimum, amend the MDP in the following manner:

Reinstate the list of technical studies required for all aggregate operations' master site development plans.

Amend Policy 3.3.1(c) to provide parallel discouragement of future aggregate extraction in locations that may impact existing residential development.

Remove Policies 3.3.1(g) and (h).

It would be better if Council reflected on the complexities involved in the recent Lehigh Hanson application and public hearing. The mutually acceptable guidelines for where aggregate operations should be located and how they should operate that would be provided in a stand-alone aggregate policy would have made the Lehigh Hanson public hearing far simpler.

From: [Michelle Mitton](#)
To: [Dominic Kazmierczak](#)
Cc: [Steven Lancashire](#)
Subject: FW: [EXTERNAL] - Comments Re MDP
Date: February 1, 2021 1:17:26 PM

MICHELLE MITTON, M.Sc
Legislative Coordinator | Legislative Services

ROCKY VIEW COUNTY
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From: Pam Janzen [REDACTED]
Sent: January 31, 2021 4:02 PM
To: Legislative Services Shared <LegislativeServices@rockyview.ca>
Subject: [EXTERNAL] - Comments Re MDP

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RockyView Council,

The proposed MDP does not honour the priorities of residents. Residents have told Council, time and again, that we value the rural nature of RVC and we want to protect our agricultural base as well as being good environmental stewards. Developments must pay for themselves and should roll out in an orderly manner. This document is very much pro-development, without sufficient restrictions to ensure any development will be an asset to local residents and indeed the entire RVC taxpaying population.

1. This proposed document does not have sufficient "teeth" to ensure the stated priorities of RVC residents. We need tighter policies...ones which say "shall" not "should." Way too much wiggle room.
2. I do not agree with 1acre parcels becoming the new definition for "Country Residential." I agree with cluster development that is serviced by piped water and waste water. I do not wish to see further fragmentation of land into these little properties. I believe RVC has an over supply of country residential properties and should focus future development into hamlets.
3. The MDP must clearly provide regulations for gravel development so that both residents and resource owners have certainty.

Pam Janzen
34199 Township Rd 240A

February 1, 2021

Further comments in response to the Municipal Development Plan, December 2020, Draft 4.

1. Overall, I am concerned that proposed changes to the MDP fail to properly recognize and support the priorities of Rocky View residents, i.e. to retain the County's rural character; to support and protect its agricultural base; to protect the environment; and to ensure that growth is both orderly and fiscally responsible.

2. Why, for example, is there a recent change reading: "Rocky View County will build resilient communities and welcoming neighborhoods **by promoting concentrated growth within designated development areas**"? If this addition in any way represents direction to encourage higher density, urban-style development as a core feature of the MDP, then it violates residents' clearly-stated priorities.

3. Of concern to me as well is the MDP's support for "higher density residential development where **appropriate**". There is no definition or policy guidance for the term "appropriate". Determination of "appropriateness" should NOT be left solely to council's discretion. It must lay within the above-noted priorities of residents.

4. The MDP draft redefines country residential development to include 1-acre parcels, which will further erode the County's rural character. The original concept of country residential developments is that they are self-sustaining properties without the need for off-site water or wastewater servicing. This is not possible for 1-acre parcels and therefore is an illegitimate redefinition. As with my other concerns, it violates County residents' stated priorities.

5. Again in what appears to be a biased preference towards development, and again against residents' priorities, the Plan substantially expands "priority growth areas". It fails to provide constraints on orderly development within these areas.

The focus on regional partnerships as a way to resolve development challenges feeds this same bias.

6. Fiscally responsible policies would focus not on Glenbow and West Balzac (full-service hamlets that currently do not exist) as priority growth areas, but on areas with pre-existing infrastructure.

7. Requirements for master site development plans for future open pit gravel mines must be clearly stated, and must, at a minimum, meet the priority of protecting the environment.

In summary, my concerns are that the MDP reflects a development-at-any-cost attitude, one that does NOT represent residents' needs and preferences. I urge County representatives to remember that they are being paid by County taxpayers to represent their (the residents') views and priorities.

As reminder, here again are the priorities:

- to retain the County's rural character
- to support and protect its agricultural base
- to protect the environment
- to ensure that growth is both orderly and fiscally responsible.

Sincerely,

Patti Lott, Rocky View County resident

To: Rocky View Council
From: Rocky View Gravel Watch
Subject: **Proposed Municipal Development Plan – Bylaw C-8090-2020**
Date: February 2, 2021

Rocky View Gravel Watch is commenting only on the proposed provisions in Section 3.3 of the new Municipal Development Plan (MDP) that apply to aggregate operations in the County. We will leave comments on the remaining areas of the MDP to others.

Gravel Watch has serious concerns with the changes in aggregate policy that are being proposed in the MDP. The changes are a severe scaling-back of the guidance provided in the current County Plan.

From a basic organizational perspective, it is completely unclear why the County's natural resource policy will no longer be part of its overall land use policies. The land uses in that section deal with residential, commercial, industrial, and institutional land use policies. These all apply to their respective land uses across the County just as do the policies for natural resource development.

Introductory Paragraph to Section 3.3

Gravel Watch objects strongly to the underlying assumption in the introduction to the Natural Resources section. Contrary to the MDP's assertion, natural resource development is **not** an "important contributor to the local economy". It is important to the regional economy and Rocky View Gravel Watch has always recognized that. However, the County receives minimal revenue from any natural resource development and many, if not most, of the employment opportunities generated by natural resource activities in the County are filled by residents of our urban neighbours.

The only significant revenue the County receives from aggregate resource development is the Community Aggregate Payment levy. The CAP levy, even at its increased rate, does not come close to covering the costs of damage to the roads caused by heavy gravel trucks.

The County needs to acknowledge the "myth" associated with the opening statement. Maintaining this façade has resulted in the County downplaying its important role in ensuring that aggregate development in Rocky View is undertaken in a responsible manner that protects both the County's residents and its environment.

It has never been clear why Rocky View is willing to sacrifice its residents and its environment for the benefit of the broader region for minimal direct benefit to itself. It is not as if Rocky View receives any commensurate benefit from its regional neighbours on other issues in exchange.

The introduction recognizes that resource extraction requires "careful consideration for how extraction is planned and implemented" because of the significant impacts it has on

adjacent land uses and the environment. These statements are of critical importance. With Council's earlier decision to cease work on a stand-alone aggregate resource plan, the guidance to ensure that this "careful consideration" is achieved must be provided in the MDP. Unfortunately, the MDP's policies are completely inadequate to ensure that the acknowledged "community concerns" and "significant impacts" from resource extraction are addressed.

Objectives

The existing County Plan's first goal for natural resource development was that natural resources should be extracted "in a manner that balances the needs of residents, industry, and society". The MDP proposes to change this wording to balancing "the needs of residents, industry, and the County".

What happened to society? The changed wording is much more inward looking and devalues the broader societal worth of environmental protection.

The second goal in the County Plan was to support "environmentally responsible management and extraction of natural resources". The MDP proposes only to have the "negative impacts on the environment" mitigated. What happened to being environmentally responsible?

Section 3.3.1 – Aggregate Extraction Policies

The actual policies in this section, with the exceptions noted below, are appropriate motherhood statements. Unfortunately, as has been demonstrated repeatedly as various open pit gravel mining applications have come before Rocky View's councils, more than platitudes are needed.

If the County genuinely wants to find the balance that protects its residents and its environment while permitting responsible aggregate extraction, far more specific guidance is required and the guidance that had been provided in the County Plan must be reinstated.

Policy 3.3.1 (a) states that the adverse impacts should be minimized for existing residents, adjacent land uses and the environment. That is appropriate. However, without detail on how to determine effective mitigation it becomes a meaningless box-ticking exercise when aggregate companies come forward with open pit gravel mine applications.

Policy 3.3.1 (b) encourages collaboration between the County, residents, and industry to develop mutually agreeable solutions. Again, without any detail or commitment from the County, this is a meaningless platitude.

If the County is actually committed to encouraging the collaboration described in this policy, it needs to take an active role in engaging residents and adjacent landowners to identify possible solutions to mitigate the unavoidable negative impacts from aggregate extraction. Residents all understand that aggregate extraction is necessary. They, like

Gravel Watch, are simply looking for it to be done in a responsible manner that does not impose unnecessary costs and damage.

For a start, the County could demonstrate its commitment to this policy by ensuring that residents' input is reviewed and incorporated by Administration as staff assess gravel company applications. Rocky View residents possess a tremendous wealth of relevant expertise on natural resource extraction issues. It is foolhardy to dismiss all that expertise and simply file it away unread and unused.

Policy 3.3.1 (c) discourages residential development that may be impacted by future aggregate extraction. Where is the parallel policy that discourages future aggregate extraction in locations that may impact existing residential development?

If the County is committed to Policies 3.3.1(a) and (b) both sides need to be included in Policy 3.3.1 (c) to acknowledge the reality that residential development and heavy industrial open pit gravel mining are completely incompatible land uses.

At an absolute bare minimum, the MDP needs to provide guidance for how these "future aggregate" locations are to be determined. Given that Rocky View has some of the most generous aggregate deposits in North America, without such guidance, this policy could potentially limit non-aggregate development in most of the County. We assume that is not actually the County's intention.

Policy 3.3.1 (f) requires that aggregate extraction applications must prepare a master site development plan. This policy is where the MDP fails County residents and future councils most dramatically, especially in comparison to the current County Plan. The MDP eliminates the list of technical studies that are required as part of master site development plans. WHY?

The County Plan recognized the complexities involved in decision-making regarding aggregate operations. To address that, it directed Administration to prepare a stand-alone policy to provide the detailed guidance needed by all parties. This Council killed that initiative and has taken no positive steps to replace it. Now, Policy 3.3.1 (f) removes the stopgap guidance the County Plan provided before its anticipated aggregate resource plan was developed.

What possible rationale is there to remove the County Plan's appendix that lists the technical studies required in support of any aggregate extraction application? How will councils ensure that residents and the environment are protected as they make decisions on future aggregate applications if there are not even a consistent set of technical reports to assess these applications?

Policy 3.3.1(g) encourages the location of complimentary industrial activity adjacent to aggregate operations. This policy is extremely troubling.

The MDP provides no guidance on where it is appropriate to locate open pit gravel mines. Given this serious failing, how can the MDP possibly conclude that it is appropriate to locate other industrial uses adjacent to these operations? This opens the door for additional industrial activity in residential communities simply because there is a gravel pit nearby. This is completely unacceptable.

Policy 3.3.1 (h) directs future councils and aggregate companies to consider transitioning gravel pits into alternative industrial uses once gravel extraction has finished. Although proposed amendments to the 1st reading MDP will remove the examples of waste transfer and processing facilities, these remain active alternatives given the policy's wording.

One of the justifications the County has always used to permit gravel pits in otherwise highly incompatible locations is that they are a temporary use. Although 25 – 50-year aggregate operations are far from most peoples' definition of "temporary", at least there is a long-range hope that former gravel pits will, someday, be reclaimed to their original state.

Current provincial legislation and previous county policy assume that gravel pits will be reclaimed back to their original use (usually agricultural), unless a case can be made that there is a higher value post-reclamation use. This policy is a dramatic departure from this longstanding approach to aggregate operations. It is not clear how or why the MDP has chosen to deviate from provincial guidelines in this area.

Conclusions

The MDP, as currently drafted, sends a strong message to residents that the County no longer cares about them or their environment when it comes to dealing with the many unavoidable negative impacts that accompany aggregate operations.

If that is not the intended message, Council must, as a bare minimum, amend the MDP in the following manner:

- Reinstate the list of technical studies required for all aggregate operations' master site development plans.
- Amend Policy 3.3.1(c) to provide parallel discouragement of future aggregate extraction in locations that may impact existing residential development.
- Remove Policies 3.3.1(g) and (h).

It would be better if Council reflected on the complexities involved in the recent Lehigh Hanson application and public hearing. The mutually acceptable guidelines for where aggregate operations should be located and how they should operate that would be provided in a stand-alone aggregate policy would have made the Lehigh Hanson public hearing far simpler.

February 2, 2021

Subject: Bylaw C-8090-2020: Municipal Development Plan (MDP)

I believe the draft of the Municipal Development Plan represents a huge revision in policy and focus from the existing County Plan, that it no longer represents the interests of the taxpayers and citizens. It needs to be postponed until there has been sufficient consultation so that public input can be included.

The plan has been written to encourage urban growth in all areas of Rocky View, there was nowhere in the public feedback from the June draft of the plan that asked for increased emphasis on urban development. While the plan references the agricultural and rural character of the County, there are no polices that have any teeth to protect the fragmentation of agricultural land, in fact lots of language and discussion to promote it.

This plan that lacks enforceable guidelines and standards is one that will allow growth anywhere, anytime and anyplace and will replace the current area structure plans that reflect local input and preference. Rocky View Council directed the crafters of this plan to provide the flexibility that renders it meaningless as far as providing the public and developers with a clear idea of what kind of development is, or is not appropriate in their communities, which is the purpose of a County plan.

The MDP plan does not specifically protect the Elbow River Alluvial Aquifer from development. It is well understood that protection of the Elbow River Alluvial Aquifer is critical for this watershed and water for Rocky View residents, the City of Calgary and others, and given the ASPS you are pushing through in Springbank and the Elbow Valley area, the protections need to be clearly identified and supported in the plan. Not to do so is flagrantly irresponsible.

This plan meets the wishes of the developers that have inspired and demanded it, but not the people of Rocky View and at this point in the middle of a pandemic and an economic slowdown there is no pressing need to pass this until proper guidelines can be introduced and the public has had a chance to provide input. This last minute, rushed one time opportunity to give feedback to a plan that will change over the next week after the public letter deadline has passed, and with no chance of a discussion with the Council passes as a very miserable and sad farce of public participation.

Thank you for your consideration of my comments.

Shannon Bailey

██████████
12 Burney Road, Bragg Creek

From: [Michelle Mitton](#)
To: [PlanningAdmin Shared](#)
Subject: FW: [EXTERNAL] - Bylaw C-8031-2020 and C-8064-2020
Date: February 3, 2021 4:48:07 PM

MICHELLE MITTON, M.SC
 Legislative Coordinator | Legislative Services

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-----Original Message-----

From: Shelley Moore [REDACTED]
 Sent: February 3, 2021 4:24 PM
 To: Legislative Services Shared <LegislativeServices@rockyview.ca>
 Cc: info@rockyviewforward.com; Debbie Vickery [REDACTED]; Division 2, Kim McKylor <KMckylor@rockyview.ca>; Division 7, Daniel Henn <DHenn@rockyview.ca>; Carol Elliott [REDACTED]; Heather Bulger [REDACTED]; Gay Lynn McCartney [REDACTED]; Glen Dickey [REDACTED]; Rob Lupton [REDACTED]; Jessica Serfas [REDACTED]; Jeannette Chung [REDACTED]; Doreen Poohachow [REDACTED]; Darren Wiltse [REDACTED]; Lisa Skelton [REDACTED]; Sylvia Blick [REDACTED]
 Subject: [EXTERNAL] - Bylaw C-8031-2020 and C-8064-2020

Do not open links or attachments unless sender and content are known.

Good Afternoon:

Please accept this email as a submission in regards to the proposed Bylaw C-8031-2020 and C-8064-2020 which refers to the new Municipal Development Plan (MDP) for the Springbank area.

We have been residents of Springbank for 24 years and have witnessed many changes to not only the area but to Alberta and Calgary. Some of these changes have been positive, and others less so. The Springbank area has long held a reputation for beautiful vistas that has balanced a diversity of development that ranges between 2 and 160+ acres. Historically, farm and country residential have lived side by side.

Our household is opposed to the proposed MDP on the following grounds:

- 1). Splitting the Springbank area into two development plans would fractionate the community. By this plan, the North side of Springbank would become the industrial/commercial area, and as a result existing properties would depreciate in value. This is unacceptable to us as our quality of life, the diversity of future development and the balance between both agriculture and commercial interests must abide by the same expectations.
- 2). The 2013 Springbank County Plan accessed many working groups (I was not only involved in one of the working groups, but also presented at the public hearing) and through time and diligence by all parties developed a framework for Springbank. The same due diligence has not been followed by the County and it is unacceptable.

3). The County appears, though its Plan to promote significantly higher density in Springbank. This is unacceptable without extensive consultation with existing developments that contain greater than 2 acre parcels. To randomly identify these lands, within existing developments as sites for further higher density is insulting to the community that these parcels exist. No public consultation has been done to inform or consult with these communities. We find this unacceptable.

4). Any proposed, higher development MUST have a significantly larger setback than what is proposed in both the Springbank ASP Servicing Strategy and the ASP's for both North and South Springbank. Fifty (50m) meters is an unacceptable buffer, and a minimum of 200m should be considered. The priority, job and responsibility of the County is to PROTECT the existing stakeholders (primarily country residential) and balance the desire for increased tax revenue from higher density residential or commercial development.

To close, our household is strongly opposed to both Area Structure Plans as proposed. More thorough public engagement is required.

Kind Regards
Shelley and Kevin Moore
39 Windmill Way
Calgary, AB
T3Z 1H5

Steven Lancashire

From: Michelle Mitton
Sent: January 25, 2021 5:25 PM
To: Dominic Kazmierczak
Subject: FW: [EXTERNAL] - New Municipal Development Plan

MICHELLE MITTON, M.SC
Legislative Coordinator | Legislative Services

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-----Original Message-----

From: Shelly [REDACTED]
Sent: January 25, 2021 3:26 PM
To: Legislative Services Shared <LegislativeServices@rockyview.ca>
Subject: [EXTERNAL] - New Municipal Development Plan

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As a Springbank resident I have strong concerns in the following areas in the proposed new Municipal Development Plan

- the lack of engagement with Springbank residents,
- the failure to respect and preserve the nature of Springbank - i.e. rural living, agricultural base, protection of the natural environment with sustainable & guided development and growth
- the lack of regard for preserving and encouraging local agriculture. Covid has highlighted the need to secure sustainable, local food supply and the same time that RVC and MDP is abandoning it. Where is the strategic thinking?

Sincerely,

Shelly Jacober

From: [Michelle Mitton](#)
To: [Dominic Kazmierczak](#)
Cc: [Steven Lancashire](#)
Subject: FW: [EXTERNAL] - Bylaw C-8090-2020 New Municipal Development Plan (MDP)
Date: February 1, 2021 1:14:52 PM

MICHELLE MITTON, M.Sc
Legislative Coordinator | Legislative Services

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From: [REDACTED]
Sent: January 31, 2021 11:17 AM
To: Legislative Services Shared <LegislativeServices@rockyview.ca>
Cc: [REDACTED]
Subject: [EXTERNAL] - Bylaw C-8090-2020 New Municipal Development Plan (MDP)

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Legislative Services, Rocky View County,

We are responding to a request for comments regarding the current draft of the Municipal Development Plan (MDP, Bylaw C-8090-2020). My wife and I have lived in Rocky View for over 20 years and are concerned with the effects that the new MDP will have on the residents. We believe that the new changes and focus of the MDP are misplaced.

The old County Plan developed in 2013, with input from Rocky View residents, was better aligned with their objectives. These objectives were and still are: to retain the County's rural character, protect its environment, retain agricultural land use, and ensure that growth is orderly and fiscally responsible. The new MDP ignores these priorities. Instead, the principle objective of the MDP is "to promote concentrated growth within designated development areas" or, in other words, transition to high-density, urban style development. The MDP does not provide guidance or constraints to determine what an "appropriate" development is and how it should be determined. The old County MDP focused on extending the range of services available to residents while the new MDP is focused on housing development without the supporting infrastructure. For example, the new MDP includes 1 acre parcels but does not adequately address the requirement for offsite water supplies and wastewater servicing. In contrast, the existing larger acreages are self-sustaining.

These issues are similar to those that exist in the proposed Old Banff Coach Road Structure Plan, the South Springbank Area Structure Plan and other proposals. We are struck with the many "should" and "may" statements rather than "shall" statements that typify the text of these plans. Phrases like "facilitating agricultural diversification" are euphemisms for fragmenting agricultural lands. The door is left

open for developers to do whatever they wish as their are few, if any, real constraints on commercial/industrial development in the plan. The residents of Rocky View are constantly bombarded with one new plan after. These plans all have one thing in common - the promotion of development for development's (or developer's) sake without much to address the real issues that have existed here for decades: water supplies and ground water management, waste management, fire and police department support, high-speed internet access, traffic overload, and protection of the environment. It would be refreshing to see a plan that addresses those issues for the current residents and without the addition of new residential and commercial development proposals that are unsupported and unnecessary.

We strongly oppose the MDP in its current form.

Sincerely,

Thomas and Barbara Nardin

Steven Lancashire

From: Allan Mar [REDACTED]
Sent: February 3, 2021 5:42 PM
To: Dominic Kazmierczak
Cc: Al Hoggan; Division 1, Mark Kamachi; Sean MacLean; Theresa Cochran; Gurbir Nijjar; Logan Cox
Subject: [EXTERNAL] - RVC Municipal Plan

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Mr. Dominic Kazmierczak
Legislative Services
262075 Rocky View Point
Rocky View County, AB, T4A 0X2

Dear sirs and Madam;

Thank you for including us in your notice of the forthcoming Public Hearing of Council to adopt the new Bragg Creek Municipal Plan on February 16, 2021.

As active developers in the County, Gateway Village in the Bragg Creek Core, Dick Koetsier and I, wish to express our support for the adoption of the Municipal Plan that will guide the progress and development for the County for the next many decades.

We believe the County Planners and consultants have done an admirable job in consulting with all stakeholders as we witnessed in the Open Houses that we attended in both Bragg Creek and the Municipal Centre.

Thank you.



Allan Mar Executive Vice President

[REDACTED] T 403 949 0047
Box 1321, Unit 6 - 27 Balsam Avenue
Bragg Creek, Alberta T0L 0K0
gateway.ca

Michelle Mitton

From: george szakaly [REDACTED]
Sent: February 3, 2021 9:48 PM
To: Legislative Services Shared
Cc: Division 4, Al Schule; DHenn@rockview.ca
Subject: [EXTERNAL] - Proposed new MDP

Follow Up Flag: Follow up
Flag Status: Completed

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To Staff and Council at Rockyview County:

Please be advised I am writing this letter in direct opposition to the proposed MDP, specifically the matter of Ecological Features as described in the MDP and as indicated on the map of identified areas.

To begin, I cannot support any process that has been generated internally with only the interest of the county in mind and no direct consultation with the land owners. It is difficult to understand where this would have originated and what the motivation would be, short of granting the County latitude over the future uses and development of private holdings without the landowners being notified directly or having an opportunity to oppose. It should be evident that in these times direct correspondence with affected individuals must be achieved as selected publications and Council minutes will not ever reach a majority of people. Further to this point, when only a few people are contacted by email on a Friday and are requested to respond on a three-business day deadline the system is falling short of fair and equitable opportunity for contemplation and comment.

I have not found any specific examples other than the far-reaching general statements of section 3.5 of the MDP that would indicate that there is any freedom of direction for the future of those lands that would be in the hands of the owners. The broad brushing of what appears to be tens of thousands of acres on the map indicates clearly that this would never be an acceptable strategy that landowners would endorse at any level.

I think it is worth mentioning that these lands are where generations of families have lived, raised families, built communities and businesses, only to have the county deny the owners of these private properties the same development potential as other lands in the County.

I would ask with respect that the Ecological Features be assessed for each property as it brought forward for development and the map be struck in its entirety from the MDP. The county should afford every landowner an opportunity to manage the future of their private holdings on their individual merit.

In summary I will state again that I am opposed to adoption of the fourth draft of the new MDP. The entire process must be more visible for all residents and specifically all landowners in the County.

I was raised and have farmed in the County for forty plus years, I am proud of the Communities I am active in in the County and have a vested interest in the growth and development the future may hold. I hope the county can respect that landowners also have an Environmental conscience and aspirations that can benefit the growth of these communities without onerous restrictions.

Thank You

George Szakaly
Box 383 Dalemead Ab

Michelle Mitton

From: Clint Docken [REDACTED]
Sent: February 3, 2021 8:34 PM
To: Legislative Services Shared
Cc: Clint Docken; Division 1, Mark Kamachi
Subject: [EXTERNAL] - Bylaw C-8090-2020

Follow Up Flag: Follow up
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Basic Concerns:

1. What was wrong with the existing County Plan?
2. Why do we need a new one?
3. Is the plan designed to facilitate urban-style development?
4. If so, is this appropriate in a rural municipality?
5. Why is the wording throughout the plan so vague?
6. Where is the environmental protection, particularly in relation to riparian areas?
7. Why are we being asked to comment on a plan that is not in final form?

Clint Docken 107 Breezewood Bay Bragg Creek

[REDACTED]

Michelle Mitton

From: michele mcdonald [REDACTED]
Sent: February 3, 2021 6:14 PM
To: Legislative Services Shared
Cc: Kamachi, Mark
Subject: [EXTERNAL] - Rocky View Municipal Development Plan

Follow Up Flag: Follow up
Flag Status: Completed

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February 3, 2021

Legislative Services
262075 Rocky View Point
Rocky View County, AB, T4A 0X2
legislativeservices@rockyview.ca

Hello, I spent some time on the weekend reviewing the MDP draft, the former RVC County plan and the Calgary Metropolitan Region Board's Interim Growth Plan. It appears to me that the MDP is aligning with the regional plan's focus on encouraging higher densities in developable rural areas (among other things). RVC's earlier County Plan includes language that Bragg Creek is exploring growth sustainability. Yet, the new MDP identifies our area prioritized as a Hamlet Growth Area. RVC has received only negative feedback from residents about high growth/high density. To my knowledge, residents of our area think we are exploring growth (as outlined in the County Plan), such as the updates to the Area Structure Plan (where there is considerable push back to planned residential density) and most locals are embracing the "Gateway Plan" to improve the core.

The definition of a Growth Area offered on page 13 of the new MDA plan reads, "priority areas within the County for the continued growth and expansion of residential, commercial and industrial land uses". I doubt many (or any) residents are aware of this shift and know that engagement with our community about prioritizing Bragg Creek as Growth Area, has not been offered. The community of Bragg Creek should be given an opportunity to determine the future of our Hamlet.

Thank you for your consideration.

Michele McDonald

Michelle Mitton

From: Richard Smith [REDACTED]
Sent: February 3, 2021 5:17 PM
To: Legislative Services Shared
Subject: [EXTERNAL] - Revised Municipal Development Plan Concerns

Follow Up Flag: Follow up
Flag Status: Completed

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Dear Sir/Madam

I wish to provide a summary of my thoughts and concerns on the proposed revision of the RVC Municipal Development Plan.

On a high level, the lack of consultation with RVC residents in the formulation of this plan is most concerning as priorities such as preserving the county's rural character, preserving the environment and supporting and protecting the agricultural base are set to be eliminated, or marginalised at best, in favour of the private development interests of the few. In addition, any systematic protection measures and development criteria will be solely at the whim of councillors and such loosening of the planning control system will not only in itself have irreversibly negative impacts on the county environment but will also foster a culture of personal gain and advancement and undermine the very existence of the council process to serve its residents.

The move to higher density residential strategy is completely at odds with the character and identity of the county region and combined with the removal of restrictions on commercial/industrial development and the relaxations of developer obligations will lead to an eradication of the natural assets and inherent characteristics that underpin the heritage, beauty and value of the region.

Furthermore, a lack of definitive wildlife and natural environment protections and considerations and the strict enforcement of these in the planning process, will accelerate the decline of the integral assets of the region, those which attract and keep residents in the area in the first place. An example is the construction of the berm in Bragg Creek to protect against floodwaters. Whilst this concept has its obvious merits, amongst the severe negatives associated with it are a complete disregard not only for the initial displacement of wildlife and its habitat, but for the subsequent ability for animals to access the river as part of their very existence. Consequently, there is evidence of increased animal vehicle collisions on adjacent roadways and animal injuries through trying to traverse the huge boulders of the berm which obstruct their access to a vital lifeblood. Proper wildlife consideration could have easily avoided such a situation by factoring it into the design process.

There are countless other examples such as this, including the extremely worrying current issue of over use of trails (and excessive traffic volumes) in the Elbow Valley area, especially given this high value habitat falls within the Yukon to Yellowstone wildlife corridor. Whilst the existence of covid 19 has no doubt exacerbated this issue, it nevertheless highlights the need for its priority inclusion in such documents as the MDP to control current and future environmental impacts.

In conclusion, amongst the many priorities the County should incorporate at a minimum in its long term plans are the concerns and wishes of its residents and the protection and conservation of its fundamental natural assets, namely its wildlife and habitat (flora and fauna) which provide a wonderful environment and landscape for us all.

Regards
Richard Smith
Resident of West Bragg Creek

From: [REDACTED]
To: [Public Hearings Shared](#)
Subject: [EXTERNAL] - Bylaw C-8090-2020
Date: Tuesday, February 16, 2021 9:55:16 AM

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Greetings:

The consultants indicated that Administration should be able to provide the industrial capacity studies they used in developing the Municipal Development Plan. Could these please be posted on the RVC website asap. It is highly questionable that Admin and the consultants had access to information that was not available to residents during the consultations for this plan.

Thank you
Janet Ballantyne

From: [REDACTED]
To: [Public Hearings Shared](#)
Subject: [EXTERNAL] - Bylaw C-8090-2020 - Municipal Development Plan
Date: Tuesday, February 16, 2021 11:12:29 AM

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Comment regarding reviewing country residential development land use specifically in ASP reviews

- why single out this one land use?
- there should be a need to provide a market analysis to determine whether any specific land use is not selling because of its own characteristics or because of general market conditions

From: [REDACTED]
To: [Public Hearings Shared](#)
Subject: [EXTERNAL] - BYLAW C-8090-2020 New MDP
Date: Tuesday, February 16, 2021 1:44:24 PM

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In the proposed MDP on pages 26 & 27 of 72 in sections 2.3.2 and 2.3.3 there is reference to a specific parcel size of 4 hectares (9.9 acres). There are areas of Rocky View County where 8 hectares (20 acres) would be a much better parcel size to utilize here.

There were numerous problems with FREEZING of the transmission of the video feed and a person misses hearing what is said while trying to get back into the video. Portions of some of the video presentations were missed and there will be a need to review the video once it is posted to get the full intent of the presentations.

J.F. (Jim) Chmilar, P.Eng.FNACE

Rocky View County T4C 2W1

Lot 1 Block 3 NW/17/28/05/05

Sent from [Mail](#) for Windows 10

From: [REDACTED]
To: [Public Hearings Shared](#)
Subject: [EXTERNAL] - Support for recommended motions for MDP
Date: Tuesday, February 16, 2021 1:05:04 PM
Attachments: [clip_image001.png](#)

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We would like to thank the Rockyview Council for all your efforts to benefit Rockyview County and its residents. We would also like to express our strong support for the following motions submitted by our Rockyview County neighbor, Ann McNabb.

Re: Rocky View MDP Plan for next 20 years Motion for 1A and Section 3.3 Performance Contract

Reeve and Council thank you for all your efforts to make Rocky View great!

Recommend motion: Rocky View (RV) Council add to Figure 2 and 3 the 1A corridor west of Cochrane as a growth corridor for residential and business and be planned.

Justification: This 1A area is being impacted by the huge expansion of the Burnco gravel pit, which has now been submitted to RV June 1, 2020. This has a huge cumulative impact for 6-7 km on the Bow River Valley, the regional water supply for over 2-3 million people for potentially up to 150 years given current market history. About 10 quarter sections or about 1200 acres of the Bow River Valley will be impacted: the equivalent of several gravel pits for the next 30-150 plus years. This is not a temporary use. See Figure Burnco pit phases.

If the Figures 2 and 3 are not revised in the MDP, then no aggregate resource approval should occur that doesn't develop an Area Structure plan first and have specific time limits. The RV MDP should not allow the Bow River to convert to compatible industrial uses as per the Aggregate resource policy 3.3 states.

Section 3.3 Natural Resource Extraction:

Recommend motion: Rocky View (RV) Council include performance criteria and social contract:

- Gravel pits (transitional use) and land use changes should be permitted and approved for an area for 10-year periods from site preparation to reclamation. Plan the area to establish potential final use. Ensure an Area Structure plan is developed first.
- Establish environment performance monitoring visible to owners and adjacent owners for: water, air, dust, noise. Use standards compatible with rural country residential. (Not city night standards). Leaving standards to Alberta Environment or others does not currently allow Rocky View neighbours' input into the process that can seriously impact adjacent landowners.
- Scope change to involve the public and nonperformance of the social contract to cause review and termination if not corrected.

***Justification:** Policy states “The extraction and use of natural resources in Rocky View County is an important contributor to the local economy. However, resource extraction can also significantly impact adjacent land uses and the natural environment, requiring careful consideration for how extraction is planned and implemented. ... should minimize impacts on surrounding land uses.”*

RV MDP and the proactive planning of the area is the forum to “develop mutually agreeable solutions”. Without proactively planning the 1A corridor west of Cochrane, how can the highest and best use for the area be determined without impacting the adjacent landowners, the environment and the critical water supply for the Calgary and areas downstream.?

These policies of resource extraction sterilize and eliminate the highest and best value of the land. Who is paying for the neighbour impact? The Pits are not temporary if the plans extend beyond 5-10 years! Land use beyond 10 years is unrealistic and unjustifiable.

At the February 2, 2021 public hearing for the Lehigh Hanson aggregate pit, Rocky View Councillors stated that the Bears paw ASP should have been updated to allow planning for the highest and best use. Councillors agreed heavy industrial (aggregate) is not compatible with country residential. Lehigh Hanson proposal for 25 years is a lifetime for most residences and one Councillor said for them.

Burnco 6-7km Cochrane West phases.

2011 RV approved Phase A1-A5 and A7 as the applicant stated the pit would last as a 10-year pit. Now 10 years later

the gravel pit is still working on phase A1 and has huge mountains of gravel. Applicant stated that the current market is 100,000 to 150,000 tons /year. Given the 15 million tons, the proposed gravel pit may last 150 years.



Reg Storms and Kathleen Cornish



From: [REDACTED]
To: [Public Hearings Shared](#)
Subject: [EXTERNAL] - Bylaw C-8090-2020
Date: Tuesday, February 16, 2021 9:18:52 AM
Attachments: [Email submissions MDP 2021.docx](#)

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To Whom it May Concern:

My name is Lori-ann Esser. I live at 40 Church Ranches Boulevard, T3R 1C1, in Rocky View County. I had intended to provide written submissions to Rocky View County Council regarding opposition to Bylaw C-8090-2020 but given that I also was involved in the hearing for the Scott Property applications, I was unable to complete my written comments on the MDP by the deadline of February 3, 2021. I have submitted a video regarding Bylaw C-8090-2020, but because of the time limit I was not able to provide the full response I had intended. I am hoping that Council will accept the more detailed submission in opposition to Bylaw C-8090-2020 attached to this email.

Thank you for your attention to this matter.

Sincerely,

Lori-ann Esser

Lori-ann Esser
40 Church Ranches Blvd.
Rocky View County, AB T3R 1C1

February 16, 2021

Rocky View County Council
Attention: Reeve Daniel Henn
Rocky View County
262075 Rocky View Point
Rocky View County, AB T4A 0X2

VIA E-MAIL: publichearings@rockyview.ca

Regarding: Opposition to Bylaw C-8090-2020, Municipal Development Plan

Dear Reeve Henn, Deputy Reeve McKylor and Councillors:

My name is Lori-ann Esser. As a resident of Rocky View County, I am providing comments opposing Bylaw C-8090-2020, the proposed Municipal Development Plan, as it is currently drafted.

First, I wish to thank you for the opportunity to address Council on the matter of the proposed Municipal Development Plan (MDP.)

Second, I want to thank you, as Council, and the Rocky View County staff, for the work that you do serving the community and for the efforts you made to draft this MDP and get it to this stage. Having worked in Public Service for most of my career, I know that it is an important, yet sometimes thankless, job. In my former career, I practiced as a lawyer in Ontario, Nova Scotia and Alberta. I was involved in statutory interpretation and drafting and analyzing many documents. I am aware of how much work goes into them. I also am aware that inadequate drafting of a statutory instrument can cause a whole lot of headaches for legislators and those trying to make sense of, and apply, that legislation down the road.

Context

My family is grateful to be living in Rocky View County and we enjoy and appreciate all that it has to offer. Originally coming from another province, we are happy to call Alberta, and specifically Rocky View County, home. We were very intentional in choosing to live here. We love our community and the many friends, neighbours, and acquaintances whom we have met. Rocky View County has been a safe haven for my family. Maintaining the rural character of this area is a priority for us and I expect for

many others in my immediate neighbourhood and the broader community of Rocky View County. As such, my concerns with respect to the MDP are related to preserving the rural nature of our area and avoiding concentrated high-density housing; protecting residential communities from incompatible industrial developments (particularly aggregate extraction and related industries); protecting agricultural land; solidifying accountable, orderly, good land-use planning; protecting the natural environment and wildlife; and encouraging the development and enhancement of natural recreation areas for people to enjoy such as accessible walking trails, ski trails and parks.

There are too many aspects to cover in just a few pages, and I respect the time that Council must take to review all of the written submissions, video submissions and the emails sent during the hearing. So I defer to many of the written submissions to Council that discuss residential density concerns and the use of ambiguous language such as using the permissive word “should” in many instances where the mandatory “shall” would offer more protection and clearer guidance. For my part, I will focus on the protection of residential communities and the neighbouring natural environment from industrial development, particularly aggregate extraction. I will refer to some of the issues that came up during the Scott Property hearing on February 2 and 3, 2021. I do not do so to rehash any of that hearing, but to illustrate and to give context to what I consider deficiencies in the MDP as it is currently drafted.

Council saw during the Scott property hearing that there was an outpouring of emotion from those who felt that their health, safety, homes and property were threatened by the possibility of a gravel pit being established in and near their neighbourhoods. Having a safe, protected home environment is of great importance to the people who invested in, and who live in, Bearspaw. I have no doubt that people living in other parts of Rocky View County are equally passionate about protecting their health, homes, properties and agricultural pursuits. This has become even more pronounced as a result of the Covid-19 pandemic. This is what I have in mind when responding to the draft MDP. As I noted in submissions to Council for the Scott Property hearing, I know that gravel is needed for infrastructure and can provide employment to Albertans. My concern is to ensure that County bylaws and plans provide clear guidance on when and where gravel extraction is acceptable, and to take every necessary measure to protect Rocky View County residents from unnecessary harm.

Limitations

My comments have to be general, as the deadline for written submissions for the MDP coincided with the Scott Property hearing. As I was very much engaged in that hearing, I was unable to give my full attention to the MDP. Neither did I have the opportunity for an in-depth comparison of the current County Plan with the proposed MDP. Based on a cursory review, it seems that the County Plan is a much more detailed document and I am unclear as to why it needs full replacement rather than being amended as was done in 2018. I rely on the fuller analysis that other people

have taken the time to do and who have provided their thoughts on the differences between them through written submissions to Council on this matter.

I do not feel that I was adequately contacted for feedback on the MDP prior to this last draft and hearing. My husband and I both submitted an online survey, with the confines that come with the manner of the questions asked and the available answers. This is all of the contact that I had with the County about the MDP. Perhaps there were other opportunities for more in-depth discussion at some of the public engagements, but I was unable to take advantage of them at the time. The current restrictions related to the Covid-19 pandemic have further impacted the ability for people to engage in this process as they might otherwise have done. I question whether there has been adequate means for providing full feedback.

Analysis of certain paragraphs of the MDP

Paragraph 2.3.1

Paragraph 2.3.1 of the MDP, under the heading “Residential Development,” states that, “Primary residential areas comprise lands where residential development and ancillary commercial and light industrial development will be the predominant land use.” In my opinion, “industrial,” light or otherwise, is not ancillary to residential land use and “appropriate commercial development” also may not be, depending on what that commercial development is. As it stands, neither “light industrial” nor “commercial development” is defined within the body of the MDP or in the glossary. This paragraph needs to be redrafted to better reflect what a primary residential area truly is for your constituents.

Example redrafting one: “Primary residential areas comprise lands where residential development will be the predominant land use.”

Example redrafting two: “Primary residential areas comprise lands where residential development and complementary commercial development will be the predominant land uses.” This would need a corresponding definition of suitable “complementary commercial development” for clarity.

Paragraph 2.4.2

Similar to the above, paragraph 2.4.2 states that “commercial and light industrial development in appropriate locations contributes to the viability of Primary Residential Areas by providing social and community meeting places, enabling employment and offering goods and services.” I am having a hard time picturing what “light industrial developments” constitute “social and community meeting places.” On their face, “commercial and light industrial developments” are not commensurate with Primary Residential Areas. This leaves residents vulnerable to interpretations and applications of this paragraph that potentially allow for developments that are incompatible with a residential area. “Commercial and light industrial developments”

are best left to the “Employment Areas” section. At the very least, the MDP needs to provide guidance as to what “commercial and light industrial development” means.

Paragraph 3.3

In the introductory paragraph for Natural Resource Development, paragraph 3.3 states that, “The extraction and use of natural resources in Rocky View County is an important contributor to the local economy.” This is a misnomer, at least insofar as gravel extraction is concerned. I refer Council back to Dr. Matthew Ayres’ expert report dated December 6, 2020, submitted by John Weatherill during the Scott Property hearings. For reference, that report is found at p. 655 in the first appendix attached to that hearing agenda. That report called into question, if not completely discredited, the actual economic benefit that would come to Rocky View County as a result of a gravel mining operation, at least one established close to a residential neighbourhood. Paragraph 3.3 needs to better reflect this reality.

Example redrafting one: “The extraction and use of natural resources in Rocky View County may be a minor contributor to the local economy.”

Example redrafting two: “The extraction and use of natural resources in Rocky View County may be a possible contributor to the local economy.”

Example redrafting three: “The extraction and use of natural resources in Rocky View County may be a contributor to the local economy.”

Paragraph 3.3.1

I would like to recount a comment a councillor made during the Scott Property hearing. Up front, I want to apologize if I am mistaken in my recollection of who made the comment or if my paraphrase does not reflect the councillor’s intention. Part of my uncertainty is because on my computer, it was sometimes hard to see or hear who was speaking. That said, I believe that during the Scott property hearing, Councillor Boehlke made the comment that by opposing the Scott property applications, the people in Bearspaw were pawning off the problem on other people in Rocky View County. That was neither my intention nor, to my knowledge, the intention of any member of my community who opposed those applications. But the comment does highlight the concern and the need for the MDP to be clear about gravel extraction near any residential community no matter where they may be in the County. The MDP as drafted does not achieve this. This is particularly important given that there is no separate policy to govern aggregate extractions in the County.

I urge Council to revisit subparagraphs 3.3.1 (a), (b), (c), (f), (g) and (h) of the MDP. These paragraphs need to provide better standards and guidance for the protection of your constituents and to standardize where and when gravel extraction is appropriate and acceptable.

3.3.1(a)

In subparagraph (a) the word “minimize” in front of “adverse impacts” should be changed to “avoid.” Residents should not be exposed to any unnecessary risk.

Example redrafting: “Avoid the adverse impact of aggregate resource extraction on existing residents, adjacent land uses, and the environment.”

3.3.1(b)

In subparagraph (b), “collaboration” between the County, aggregate industries, residents and landowners must include the requirement for County administration to consider the submissions of respondent residents and their related expert reports in opposition to any application for a gravel pit. Similarly, expert reports and studies that an applicant submits in relation to seeking County’s approval for a gravel pit operation should be made available to the public well in advance of the related hearing such that residents have the time and opportunity to absorb the information and provide appropriate response. Only then can there be true “collaboration.”

As above, the word “mitigation” in this subparagraph is not strong enough to protect constituents. The impact of extraction activities on nearby residents needs to be nothing less than “avoided.”

Example redrafting: “Encourage collaboration between the County, the aggregate extraction industry, and impacted residents and landowners to develop mutually agreeable solutions that avoid and negate impacts of extraction activities.”

Add: Requirements for disclosure of applicant materials to the public within a generous time frame to allow for appropriate response.

Add: Requirements for County staff to consider respondent materials and expert reports when drafting a recommendation to Council.

3.3.1(c)

Subparagraph (c) must include a parallel guideline that aggregate extraction should not only be discouraged, but also prohibited, near current and planned residential developments.

Example drafting one: Add “Prohibit aggregate extraction and related industrial uses that may impact current and planned residential development.”

Example drafting two: Add “Discourage aggregate extraction and related industrial uses that may impact current and planned residential development.”

3.3.1(f)

Subparagraph 3.3.1(f) refers to the necessity for a Master Site Development Plan (MSDP.) This is good, except that what is in the draft MDP does not go far enough to legislate the requirements for the MSDP. During the Scott Property hearings, we heard about the many aspects of life, health and the environment that can be impacted by a gravel pit. The MDP should not be decreasing the requirement for a complete and detailed MSDP for these types of applications. In fact, it should be maintaining or, better yet, bolstering it. At the very least, the appendices included in the current County Plan should be included in the MDP, if not supplemented. Council should consider the requirement that, where appropriate, applicants provide a detailed and definitive reclamation plan as part of an MSDP.

In addition, the MDP should provide that where in-house expertise is not available to County staff, they should be required to engage independent experts to advise Council on technical matters that arise from an applicant's MSDP and make these reports available to the public well in advance of any hearing.

Similarly, as noted above, applicant materials, including expert reports and studies that are submitted to Council as part of a MSDP, must be disclosed to residents/respondents well in advance of a hearing to allow for appropriate review of, and response to, the applicant's materials.

Example redrafting: Add a list of reports and studies required for an MSDP.

Example redrafting: Add the requirements for Council's independent studies or reports where required for understanding technical matters outside of the expertise of County staff.

Example redrafting: Add the requirement for disclosure of applicant materials in advance of a hearing to allow for appropriate response from affected residents and landowners.

3.3.1(g)

Subparagraph 3.3.1 (g) states, "Consider co-locating other complementary industrial uses adjacent to aggregate extraction sites." This subparagraph needs to give better guidance as to what is an appropriate "complementary" industry to gravel extraction and when and where it would be suitable to co-locate with a pit. These "complementary" industries should be subject to the same standards to protect neighbouring residential communities as do gravel extraction industries, including submitting an MSRP.

3.3.1(h)

Reclamation, for example after an approved aggregate pit is exhausted, needs to be better addressed in the MDP. During the Scott Property hearing, Councillor Hanson (I

believe) asked the applicant, “How would country residential look like after mining?” The question related to the fact that the property in question was currently designated “agricultural” with future land use designated as “country residential” and would be exposed to 25-30 years of open-pit gravel mining. Tellingly, Mr. Venner’s response, on behalf of the applicant, affirmed the common-sense doubt that the land could go back to either of its originally designated uses. He began talking about the “potential for regional infrastructure uses” such as a water reservoir to help alleviate flooding in the area, or “future urban development to store raw water.” Then he said, “But we are getting ahead of ourselves,” following which he talked about working with the community for an end use like the Inland soccer pitch. Then he said that the plan was to return the land to agricultural use. This sounded doubtful, given everything else that he listed off first. He continued by talking about it as “an opportunity yet to be explored” with future councils. The non-answer was an answer. And it spoke volumes.

Council needs to protect its constituents by providing for appropriate and adequate reclamation. If reclamation cannot be achieved sufficiently, or if the proposed alternate end-purpose of an exhausted pit, for example, would be incompatible with neighbouring lands, the extraction should not be permitted.

Paragraph 3.3.1(h) needs to be made mandatory. “Supporting” reclamation, with the door wide open to considering and allowing “other industrial or complimentary uses” instead, does not sufficiently protect adjacent residents or landowners. The MDP needs to be definitive on what reclamation is and what will be acceptable reclamation. At the very least, the MDP needs to outline when, where and what other “industrial and complementary uses” would be considered.

Paragraph 3.5.1

Similarly, the MDP as currently drafted doesn’t go far enough to provide for environmental protections. At the Scott Property hearing, one of the reports that the applicant submitted said something to the effect that impact on wildlife and the environment would be minimal. The report indicated that whatever wildlife was there would simply, “find somewhere else to go.” Biologist Robert Best challenged the sufficiency of the wildlife study in his report dated December 18, 2020, found at p. 621 of the first appendix to the agenda for that hearing. Even with the current requirements of an MSDP, the applicant at the Scott Property hearing completely failed to address the impact on fish. Council also knows about the conflicting reports submitted at that hearing regarding the impact of such a pit on the local aquifer.

Under paragraph 3.5.1 (a), development applications “may” require impact assessments. That language needs to be changed to the imperative and should be bolstered by an extensive and exhaustive list of what reports and studies are mandatory for any development application to be considered, let alone accepted and approved.

Example redrafting: “Where development is proposed near potential *Ecological Features*...development applications must require the preparation and implementation of a bio-physical impact assessment to identify potential negative impacts and mitigation measures.”

Additional drafting:

I realize that there may be interplay with provincial legislation, but to the extent that it has jurisdiction to do so, Council should include wording in the MDP to prevent multiple applications for aggregate extraction for the same property. Once Council has decided that a property is inappropriate for aggregate extraction because it is incompatible with nearby residential developments, future applications for any similar type of extraction on the same property should be prohibited so that residents can be assured and confident that Council’s decisions won’t be open to being revisited or changed every few years.

Conclusion

As currently worded, the proposed MDP does not go far enough to provide for accountable, orderly, good land-use planning and protection of current residents and landowners. It seems to reduce restrictions that are in place to protect residential communities from industrial development and, instead, leaves “appropriate development” open to interpretation and potentially incompatible and inconsistent results. There are fewer rules and oversight through this MDP, which may lead to poor development choices and no way for residents, landowners and other affected parties to respond. In terms of replacing the current County Plan, sometimes less is less.

The use of permissive language in many parts of the MDP may seem useful for giving Council greater leeway in making decisions. In my experience, however, the use of ambiguous language leads to misinterpretation, misapplication and unintended or inconsistent results. Tightening up the language in the MDP will reduce and avoid difficulties of statutory interpretation for future Councils, constituents and other interested parties for years to come.

I suggest that more drafting can be done to ensure residents, landowners and their interests are protected; to assist in maintaining the rural nature of the County; to achieve better protection of agricultural pursuits; and to better protect and maintain the natural environment, including wetlands and wildlife. More work on this document will help provide the necessary framework and tools that will lead to sound land-use planning and County development that can continue for years to come. In turn, Rocky View County will continue to be the beautiful, dynamic and thriving place that we call home.

Respectfully submitted,

Lori-ann Esser

From: [REDACTED]
To: [Public Hearings Shared](#)
Subject: [EXTERNAL] - C-8090-2020
Date: Tuesday, February 16, 2021 9:10:16 AM
Attachments: [Video script MDP draft.docx](#)

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APPENDIX for C-8090-2020 from Keren Farquharson (SE 36-28-4-W5) representing Farquharson Farms

The following details coincide with previous points in my video presentation and provide clarification and edits.

Text in italics is script from the draft. Red are additions. Black are edits to existing text.

<!--[if !supportLists]-->1. <!--[endif]--> *Vision:*

*Set within a cherished natural landscape, Rocky View County is a flourishing municipality that provides a high quality of life, guided by its rural heritage, **balances agriculture with** a diversity of residential and economic opportunities, and sustainable development.*

<!--[if !supportLists]-->2. <!--[endif]-->In 1.4 *Rocky View County Context* on page 5, there is no mention of the vast mixed farming areas that lie between the west country and the eastern side of the County. The central area of RVC is not represented.

*In the County's western reaches, coniferous forests of the Rocky Mountain Foothills transition to rolling hills scattered with ranches. Moving eastward, the foothills give way to prairie grasslands and wetlands **with the central area predominantly mixed agricultural operations.** Eastern Rocky View County is dominated with agricultural operations, including the production of hay, cereal and oilseed crops. Large scale ranching, logging, and oil and gas extraction are major industries in western Rocky View County **while mixed farming, ranching, equestrian and shale gas development are dominate in the central area, and while shale gas development, ranching, equestrian** livestock operations, conventional agricultural operations, and diversified agriculture, including greenhouses and nurseries, are prominent in eastern areas of the County.*

<!--[if !supportLists]-->3. <!--[endif]-->Regarding *Growth map: Figure 2*. The map labelling/coding needs redoing to be inclusive. Agricultural (mixed farm and ranch lands) and resource areas (aggregate; timber) need to be identified in planning suitable growth. Overlays or more maps are needed.

<!--[if !supportLists]-->4. <!--[endif]-->The definition of 'ecology' is: "the study of relationships between living organisms, including humans and their living environment; it seeks to understand the vital connections between plants and animals and the world around them". The '*Ecological Features*' description on page 15 groups 'valuable agricultural soils' into ecological features with wetlands, riparian areas and wildlife categories and makes no sense. What has been included in ecological features does not fit with the definition of ecology. This needs to go back to the drawing board. New categories need to be developed and coded separately: **i) Environmentally Significant Areas (wetlands; riparian areas; wildlife corridors); ii) Agriculturally Significant Areas (grasslands; field crops); and iii) Resource Significant Areas (aggregate, timber, oil & gas).**

5. <!--[endif]-->The County must be more aware of the land potential within its own boundaries because not all data from other sources is accurate, but it is used by the County. The Government of Canada Land Capability for Agriculture (Canada Land Inventory) classifies much of our area land in our westerly NC region as 4 H,T. This means:

4= severe limitations that restrict the range of crops or require conservation practice

H = temperature (early frosts)

T = adverse topography (steep terrain)

This suggests our lands are not valuable productive agricultural lands . However, on these 4H,T fields my

(late) Dad, brother and his sons grow successful hay crops, cereal and oil seed crops with high yields using select grain seed varieties that require a shorter growing season and mature early. With 26%-73% hail this year my barley crop still came in over 60 bushels/acre. We would not be successful farmers if our lands were non-productive. The remainder of our lands that are not suitable for crop production are ideal for grazing our cattle, thus mixed farming. These lands must be recognized for their best use of land as agricultural production, be protected from other development and coded on County maps accurately.

<!--[if !supportLists]-->6. <!--[endif]-->and 7.

Page 11 - 2.2 Growth Areas

b) New development ~~may occur~~ **shall be discouraged** outside of the identified priority growth areas, however, **may be considered with public consultation and surrounding neighbor support**, Council review and approval. The map also highlights the presence of ~~ecological features~~ **environmental features, agricultural areas, and natural resource areas** that warrant further study when development is proposed in these growth areas.-(see 4 above)

(see 4 above, then rewrite)

OR

b) New development **that is compatible with surrounding land uses, preserves agricultural land, and is suitable in size, scope and scale** may occur outside of the identified priority growth areas, however, with **public consultation and surrounding neighbor support**, Council review and approval. The map also highlights the presence of ~~ecological features~~ **environmentally significant areas, agricultural areas, and natural resource areas** that warrant further study when development is proposed in these growth areas.-(see 4 above)

Since opponents cannot Appeal a Redesignation, then there must be clear direction for Council and Development Authority as well as applicants.

Page 17 – 2.3.1 Primary Residential Areas comprise lands where residential development and ancillary commercial and industrial development will be the predominant land use..... When including Hamlet Growth Areas, most of the residential growth within the County over the next 20 years will be directed to Primary Residential Areas.

b) New development ~~may occur~~ **shall be discouraged** outside of identified priority growth areas. ~~with Council review and approval.~~

Page 19 - 2.3.2 Country Residential Development

The introduction to this 2.3.2 section is not clear. It reads that country residential communities only occur within Primary Residential Areas.

There is no definition in the Glossary for either 'Primary Residential Areas' or 'Country Residential Communities'.

2.3.2 Country Residential Development. The County has a number of country residential communities **outside of and within Primary Residential Areas**, some formally defined by area structure plans while others have grown organically over time. Country residential communities provide a unique lifestyle that many people desire, but additional growth in these areas ~~shall~~ **should** be considered through the lens of long-term fiscal sustainability for the County **and preservation of agricultural land**.

<!--[if !supportLists]-->b) <!--[endif]-->Where residential development with two or more dwelling units and greater than 4 hectares (9.9 acres) is proposed, but there is no existing area structure plan or conceptual scheme that includes the development area, an area structure plan or conceptual scheme should be adopted **at the expense of the applicant**. When determining whether an area structure plan or conceptual scheme is appropriate, Council ~~shall~~ **should** give consideration to:
Location, Preservation of agricultural lands and resources • Number of units proposed; • Intensity of the proposed development; • Relationship of the proposed development to surrounding

land uses; • How the proposed development may impact future development of the surrounding lands; • Impact of the proposed development on County servicing and transportation infrastructure; • Impact of the proposed development on storm water management; and.....

<!--[if !supportLists]-->c) <!--[endif]-->Multiple unit country residential developments less than 4 hectares (9.9 acres), except for fragmented country residential development (refer to Section 2.3.3), should not be supported. ???

This statement is confusing needs clarification : i) It could be suggesting that only larger parcels would be acceptable for multiple development AND / OR ii) it means that lots each need to be larger than 9.9 acres to be supported.

e) iii) Where country residential development is not being achieved as expected, the County **shall** ~~should consider~~ **reduce** ~~reducing~~ the overall area dedicated to country residential development.

Page 26 - 2.6.1 Institutional and Community Policies

<!--[if !supportLists]-->d) <!--[endif]-->Proposals for institutional and community land uses that are not within the areas identified in Policy 2.6.1 a) **will may** be considered if the following is addressed:
i) Support from adjacent neighbors and residents within community ii) Preservation of agricultural land i) Justification of the proposed location; ii) Demonstration of the benefit to the broader public; iii) Compatibility and integration with ~~existing~~-surrounding land uses or nearby communities; and iv) Infrastructure with the capacity to service the proposed development.

Page 31 - Agriculture 3.4 Objectives

The policies within the Agriculture Policy Area are to ensure the following objectives:

- The agriculture sector remains an important component of the county's economy.
- Adverse impacts on agriculture from nonagricultural land uses are minimized.
- New forms of agriculture innovation and diversification are encouraged through land use.
- **Discourage and minimize land taken out of agricultural production.**

Page 32/33 - 3.4.1 Agricultural Policies

<!--[if !supportLists]-->e) <!--[endif]-->Applicants proposing new residential, **recreational**, institutional, commercial, and industrial land uses shall design and implement measures to minimize their adverse impacts on existing agriculture operations, based on the County's Agriculture Boundary Design Guidelines **and**:

<!--[if !supportLists]-->i) <!--[endif]--> **undertake consultation with neighbors and /or affected community members and provide their written confirmation letters to the County with applications.**

<!--[if !supportLists]-->ii) <!--[endif]--> **support the 'Right to Farm' principles which support agricultural operators in going about their day-day business with minimum adverse impacts from non-agricultural land use.**

By adding the above, these filters this could potentially save a lot of time and cost to the County, taxpayers and affected parties. Applicants may decide to not apply if there is significant opposition from neighbors and /or community residents. However, if an application were to move forward for review, it would give the County a better understanding of potential appeals if there was significant opposition.

The video presentation is in the attachment (for reference).

Respectfully submitted, Keren Farquharson on behalf of Farquharson Farms

RE: Municipal Development Plan Bylaw C-8090-2020

INTRODUCTION

My name is Keren Farquharson. I am speaking on behalf of Farquharson Farms: my brother Don Farquharson and his two sons, Stacey, and Cody. We respectfully offer our comments and edits to the Draft before you, not in opposition, but to strengthen the Municipal Plan.

We farm in the (westerly) North Central area of Division 9. Our families are generational farmers in the Madden /Dog Pound/Bottrel vicinities. These rural areas are still dominantly agriculture. A few country residences dot into our landscape but unfortunately, we are witnessing our areas being threatened with other potential development that is not related to agriculture. Concentrating and directing non-agricultural development to growth areas is imperative to alleviate pressure of unfavorable development in ag communities. There are some weakness and loopholes in this draft that would not protect our farm and ranch lands from incompatible and irreversible development.

RATIONALE

Adverse development (such as resorts, lodges, campsites, or subdivisions) would not be compatible with agricultural operations. They would have negative impact on farmers. Our ag livelihoods must be safeguarded with the 'right to farm principles'. The MDP along with other policies and plans are crucial to provide more definitive direction to County Planners, Councilors, developers, and applicants with unambiguous guidelines to deal with the demands of development. As RVC continues to grow it is paramount to preserve our ag lands and conserve other non-renewable resources. Once our farmlands and other natural resources are built over with development, there is no going back to growing crops, grazing livestock, excavating gravel, or harvesting timber. Growth is inevitable but **must** be directed only to growth areas. Foresight beyond the next 20 years is imperative or situations such as the Hansen gravel conflict will continue. Being proactive rather than reactive is a win-win now and for the future.

RECOMMENDATION OF CHANGES NEEDED IN THE DRAFT MDP

In this new MDP there needs to be more recognition and greater significance for the retention of agricultural lands: details are missing; wording is too weak ; ag lands are not identified; the value of agriculture is not stressed enough; and there is not adequate protection for agricultural land. These source lands produce our food. I will introduce 7 points. Each of these points have further detail or edits (by cut and paste from the draft) in the Appendix which was emailed today and will assist to clarify the following points:

1. The word 'agriculture' has been removed from the 'Vision' and must be added back in.
[See Appendix (1)]
2. In 1.4 Rocky View County Context on page 5 in the 1st and 3rd paragraphs, the description of the County jumps from stunning depictions of the west to picturesque explanations of the east without any mention of the vast central region in between and what it showcases. This mixed farmland agricultural area composes much of the land mass of RVC and must receive acknowledgement. [See Appendix (2)]

3. In Figure 2 Growth Map on page 14, information is incomplete and inaccurate. There is no coding for resources or agricultural land. All ag land must be identified, valued, and validated. Grouped in with 'Ecological' are 'valuable agricultural soils'. Farmland soils in our area do not fit in this 'valued soils' coded category, but we produce high yielding crops, however, are not given recognition on the map. This missing data is relevant to identify where growth is not acceptable. This opens an escape for potential incompatible development in predominantly agricultural areas. The map is inadequate and needs to be redone, with perhaps 2 or 3 layers, or more maps added. [See Appendix (3)]

4. Further to the point I just discussed, the "Ecological Features" that are coded on Figure 2 Map are described on page 15 as: "*These potentially important ecological features include wetlands, riparian areas, valuable agricultural soils, and wildlife corridors*". This labelling and grouping in the MDP is perplexing. Where you have a wetland, you do not have valuable agricultural soils, as portrayed on the map within the same code. It would be logical to group separately: a) environmental areas b) agricultural lands; and c) resources. Each merit their own recognition and category so that growth areas are responsibly managed. [See Appendix (4)]

5. The County relies on land data rated by the Canada Land Inventory. In our area our lands are rated as 4H,T 'severe with adverse climate and topography'. This suggests there could be better use of these lands. But in fact, our lands in our area are productive ag lands. We received the Master Farm Family Award in 2005. Using other data that is misleading reinforces that the County's own mapping, data and terminology must be accurate and inclusive. When land is not recognized for its value, then redesignations, inappropriate developments, or subdivisions are hard for Development Authority or Council to refuse and opponents to challenge. [See Appendix (5)]

6. Preference would be that you would stick firmly with the growth areas identified for the next 20 years. There should be no need for new ASPs (except for the existing organic spread in rural areas). Conceptual plans outside of ASPs should not be allowed to prevent development or potential subdivisions from appearing wherever, as has happened in the past with the organic unplanned and uncontrolled spread in the rural County areas. [[See Appendix (6)]

7. If the MDP policy were more straightforward, for example, 'shall' instead of 'should'; 'discouraged' instead of 'may occur'; 'required' instead of 'recommended', there would be less risk of interpretation and that would alleviate uncertainty. Do not leave it to discretion. Provide clarity. Other statutory plans and policies exist, but in the hierarchy, the MDP provides the guidance for them. The County, both Development Authority and Council, as well as potential developers and applicants, need clearer guidelines in this MDP document. Communities and residents in our rural area need more security and less stress without the concern of the potential burden of incompatible development on our agricultural lands.

CONCLUSION

I attended Open Houses, replied to the surveys for the MDP and the Land Use Bylaw and have followed documents revisions. I am asking that you table today's second reading, consider our comments seriously and adapt them into the document so that future growth is not based on inaccurate information, or lack of information, but instead clear direction. The foresight now in this MDP document is tomorrow's future.

Thank you for your attention and time.

From: [REDACTED]
To: [Public Hearings Shared](#)
Subject: [EXTERNAL] - MDP Bylaw C-8090-2020
Date: Tuesday, February 16, 2021 10:23:35 AM

Do not open links or attachments unless sender and content are known.

Council,

I am watching the Public Hearing and contacting you regarding the introductory comments to the proposed MDP. The Planning Design speaker referred to 'Elbow Valley' as a 'hamlet' and 'hamlet growth area' when referencing Figure 2 on page 28 and later in reference to section 2.5 Hamlet Development. Elbow Valley is not a hamlet

Elbow Valley is a registered Trademark term referring to the discrete community close by and to the west of Calgary straddling Highway 8 that is managed by Elbow Valley Residents Club (EVRC). The Elbow Valley community consists of 699 homes with associated amenities and natural parkland comprising about half of the community area. Elbow Valley is fully built out.

An amendment in the recent draft removed reference to 'Elbow Valley' on Figure 2 as a hamlet. In the new draft the map and text correctly refers to 'Elbow View', which is a proposed development to the west of Elbow Valley and adjacent communities along Highway 8.

Thank you for your effective adaptation to Covid-19 in providing virtual opportunities to participate in Hearings.

Regards,

Wayne Jessee
EVRC External Affairs Committee

From: [REDACTED]
To: [Public Hearings Shared](#)
Subject: [EXTERNAL] - Bylaw C-8090-2020
Date: Tuesday, February 16, 2021 10:31:30 AM

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Thank you for the opportunity to provide comments regarding the Municipal Development Plan.

I have concerns about the weakened language regarding resource development in the County, specifically in relation to aggregate extraction operations. Aggregate deposits are prevalent throughout all parts of Rocky View County, and it is important to ensure that development and extraction is located in those areas that will:

- Avoid impact to residents
- Avoid environmentally sensitive areas
- Provide positive economic benefit to the County

Further, where aggregate development is considered, there must be clear and strict requirements to guide project proponents, County staff, and Council. I am concerned that the draft language in the MDP weakens the requirements for proponents, and indeed for future staff and Council, in regards to future developments. I urge Council to consider the following amendments to the MDP:

- Reinststate the list of technical studies required under the existing County Plan for all aggregate operations' master site development plans.
- Amend Policy 3.3.1(c) , which discourages residential development that may be impacted by future aggregate extraction, to provide parallel discouragement of future aggregate extraction in locations that may impact existing residential development.
- Remove Policies 3.3.1(g) and (h). These policies appear to prioritize industrial activity near aggregate operations, and to prioritize industrial operations as future land uses after aggregate extraction. Without clarity about which locations in the County may be appropriate for aggregate development, these policies could inadvertently encourage incompatible industrial operations adjacent to residential and/or environmentally sensitive areas in the County.

Council and County Staff should always want to make the most accurate and well-informed decision. This is particularly true for aggregate operations, which can have significant negative impacts on surrounding areas, and which operate over long time horizons. Making the most accurate decision requires sufficient technical analysis to be a) provided by the proponent on a mandatory basis and b) evaluated by experts to ensure completeness and validity.

Thank you,

John Weatherill

51 Timber Ridge Way

Rocky View County

From: [Division 7, Daniel Henn](#)
To: [Public Hearings Shared](#)
Subject: FW: [EXTERNAL] - C8090-2020 - opposed
Date: Tuesday, February 16, 2021 1:42:33 PM

Please include in late submissions

Dan

-----Original Message-----

From: Teri Lipman [REDACTED]
Sent: February 16, 2021 1:40 PM
To: Municipal Council <MunicipalCouncil@rockyview.ca>
Subject: [EXTERNAL] - C8090-2020 - opposed

Do not open links or attachments unless sender and content are known.

Dear Councillors

I am opposed to the new plan because in a word, it's very weak and I believe it is written with a bias towards supporting commercial developers and industry over residents and preservation of the environment.

Thankyou

Teri Lipman
12 Crestview Estates
T3R 1E1

Sent from my iPad

From: [REDACTED]
To: [Public Hearings Shared](#)
Subject: [EXTERNAL] - Recommended Motions for MDP
Date: Tuesday, February 16, 2021 12:30:19 PM
Attachments: [clip_image001.png](#)

Do not open links or attachments unless sender and content are known.

Rocky View MDP Plan for next 20 years Motion for 1A and Section 3.3 Performance Contract

Reeve and Council thank you for all your efforts to make Rocky View great!

Recommend motion: Rocky View (RV) Council add to Figure 2 and 3 the 1A corridor west of Cochrane as a growth corridor for residential and business and be planned.

Justification: This 1A area is being impacted by the huge expansion of the Burnco gravel pit, which has now been submitted to RV June 1, 2020. This has a huge cumulative impact for 6-7 km on the Bow River Valley, the regional water supply for over 2-3 million people for potentially up to 150 years given current market history. About 10 quarter sections or about 1200 acres of the Bow River Valley will be impacted: the equivalent of several gravel pits for the next 30-150 plus years. This is not a temporary use. See Figure Burnco pit phases.

If the Figures 2 and 3 are not revised in the MDP, then no aggregate resource approval should occur that doesn't develop an Area Structure plan first and have specific time limits. The RV MDP should not allow the Bow River to convert to compatible industrial uses as per the Aggregate resource policy 3.3 states.

Section 3.3 Natural Resource Extraction:

Recommend motion: Rocky View (RV) Council include performance criteria and social contract:

<!--[if !supportLists]-->•<!--[endif]-->Gravel pits (transitional use) and land use changes should be permitted and approved for an area for 10-year periods from site preparation to reclamation. Plan the area to establish potential final use. Ensure an Area Structure plan is developed first.

<!--[if !supportLists]-->•<!--[endif]-->Establish environment performance monitoring visible to owners and adjacent owners for: water, air, dust, noise. Use standards compatible with rural country residential. (Not city night standards). Leaving standards to Alberta Environment or others does not currently allow Rocky View neighbours' input into the process that can seriously impact adjacent landowners.

<!--[if !supportLists]-->•<!--[endif]-->Scope change to involve the public and nonperformance of the social contract to cause review and termination if not corrected.

Justification: Policy states "The extraction and use of natural resources in Rocky View County is an important contributor to the local economy. However, resource extraction can also significantly impact adjacent land uses and the natural environment, requiring careful

consideration for how extraction is planned and implemented. ... should minimize impacts on surrounding land uses."

RV MDP and the proactive planning of the area is the forum to *"develop mutually agreeable solutions"*. Without proactively planning the 1A corridor west of Cochrane, how can the highest and best use for the area be determined without impacting the adjacent landowners, the environment and the critical water supply for the Calgary and areas downstream.?

These policies of resource extraction sterilize and eliminate the highest and best value of the land. Who is paying for the neighbour impact? The Pits are not temporary if the plans extend beyond 5-10 years! Land use beyond 10 years is unrealistic and unjustifiable.

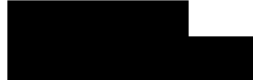
At the February 2, 2021 public hearing for the Lehigh Hanson aggregate pit, Rocky View Councillors stated that the Bears paw ASP should have been updated to allow planning for the highest and best use. Councillors agreed heavy industrial (aggregate) is not compatible with country residential. Lehigh Hanson proposal for 25 years is a lifetime for most residences and one Councillor said for them.

Burnco 6-7km Cochrane West phases.

2011 RV approved Phase A1-A5 and A7 as the applicant stated the pit would last as a 10-year pit. Now 10 years later the gravel pit is still working on phase A1 and has huge mountains of gravel. Applicant stated that the current market is 100,000 to 150,000 tons /year. Given the 15 million tons, the proposed gravel pit may last 150 years.

<!--[if !vml]--> <!--[endif]-->

Ann McKendrick McNabb



From: [REDACTED]
To: [Public Hearings Shared](#)
Subject: [EXTERNAL] - Bylaw C-8090-2020 Recommended Motions for MDP resubmitted with reference to Bylaw
Date: Tuesday, February 16, 2021 1:25:15 PM
Attachments: [clip_image001.png](#)

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Previously submitted without reference to BYLAW C-8090-2020

Rocky View MDP Plan for next 20 years Motion for 1A and Section 3.3 Performance Contract

Recommend motion: Rocky View (RV) Council add to Figure 2 and 3 the 1A corridor west of Cochrane as a growth corridor for residential and business and be planned.

Justification: This 1A area is being impacted by the huge expansion of the Burnco gravel pit, which has now been submitted to RV June 1, 2020. This has a huge cumulative impact for 6-7 km on the Bow River Valley, the regional water supply for over 2-3 million people for potentially up to 150 years given current market history. About 10 quarter sections or about 1200 acres of the Bow River Valley will be impacted: the equivalent of several gravel pits for the next 30-150 plus years. This is not a temporary use. See Figure Burnco pit phases.

If the Figures 2 and 3 are not revised in the MDP, then no aggregate resource approval should occur that doesn't develop an Area Structure plan first and have specific time limits. The RV MDP should not allow the Bow River to convert to compatible industrial uses as per the Aggregate resource policy 3.3 states.

Section 3.3 Natural Resource Extraction:

Recommend motion: Rocky View (RV) Council include performance criteria and social contract:

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<!--[if !supportLists]-->•<!--[endif]-->Establish environment performance monitoring visible to owners and adjacent owners for: water, air, dust, noise. Use standards compatible with rural country residential. (Not city night standards). Leaving standards to Alberta Environment or others does not currently allow Rocky View neighbours' input into the process that can seriously impact adjacent landowners.

<!--[if !supportLists]-->•<!--[endif]-->Scope change to involve the public and nonperformance of the social contract to cause review and termination if not corrected.

Justification: Policy states "The extraction and use of natural resources in Rocky View County is an important contributor to the local economy. However, resource extraction can

also significantly impact adjacent land uses and the natural environment, requiring careful consideration for how extraction is planned and implemented. ... should minimize impacts on surrounding land uses.”

RV MDP and the proactive planning of the area is the forum to “develop mutually agreeable solutions”. Without proactively planning the 1A corridor west of Cochrane, how can the highest and best use for the area be determined without impacting the adjacent landowners, the environment and the critical water supply for the Calgary and areas downstream.?

These policies of resource extraction sterilize and eliminate the highest and best value of the land. Who is paying for the neighbour impact? The Pits are not temporary if the plans extend beyond 5-10 years! Land use beyond 10 years is unrealistic and unjustifiable.

At the February 2, 2021 public hearing for the Lehigh Hanson aggregate pit, Rocky View Councillors stated that the Bears paw ASP should have been updated to allow planning for the highest and best use. Councillors agreed heavy industrial (aggregate) is not compatible with country residential. Lehigh Hanson proposal for 25 years is a lifetime for most residences and one Councillor said for them.

Burnco 6-7km Cochrane West phases.

2011 RV approved Phase A1-A5 and A7 as the applicant stated the pit would last as a 10-year pit. Now 10 years later the gravel pit is still working on phase A1 and has huge mountains of gravel. Applicant stated that the current market is 100,000 to 150,000 tons /year. Given the 15 million tons, the proposed gravel pit may last 150 years.

<!--[if !vml]--> <!--[endif]-->

On Feb 16, 2021, at 12:29 PM, Ann McNabb <[REDACTED]> wrote:

Rocky View MDP Plan for next 20 years Motion for 1A and Section 3.3 Performance Contract

Reeve and Council thank you for all your efforts to make Rocky View great!

Recommend motion: Rocky View (RV) Council add to Figure 2 and 3 the 1A corridor west of Cochrane as a growth corridor for residential and business and be planned.

Justification: This 1A area is being impacted by the huge expansion of the Burnco gravel pit, which has now been submitted to RV June 1, 2020. This has a

huge cumulative impact for 6-7 km on the Bow River Valley, the regional water supply for over 2-3 million people for potentially up to 150 years given current market history. About 10 quarter sections or about 1200 acres of the Bow River Valley will be impacted: the equivalent of several gravel pits for the next 30-150 plus years. This is not a temporary use. See Figure Burnco pit phases.

If the Figures 2 and 3 are not revised in the MDP, then no aggregate resource approval should occur that doesn't develop an Area Structure plan first and have specific time limits. The RV MDP should not allow the Bow River to convert to compatible industrial uses as per the Aggregate resource policy 3.3 states.

Section 3.3 Natural Resource Extraction:

Recommend motion: Rocky View (RV) Council include performance criteria and social contract:

• Gravel pits (transitional use) and land use changes should be permitted and approved for an area for 10-year periods from site preparation to reclamation. Plan the area to establish potential final use. Ensure an Area Structure plan is developed first.

• Establish environment performance monitoring visible to owners and adjacent owners for: water, air, dust, noise. Use standards compatible with rural country residential. (Not city night standards). Leaving standards to Alberta Environment or others does not currently allow Rocky View neighbours' input into the process that can seriously impact adjacent landowners.

• Scope change to involve the public and nonperformance of the social contract to cause review and termination if not corrected.

Justification: Policy states “The extraction and use of natural resources in Rocky View County is an important contributor to the local economy. However, resource extraction can also significantly impact adjacent land uses and the natural environment, requiring careful consideration for how extraction is planned and implemented. ... should minimize impacts on surrounding land uses.”

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These policies of resource extraction sterilize and eliminate the highest and best value of the land. Who is paying for the neighbour impact? The Pits are not temporary if the plans extend beyond 5-10 years! Land use beyond 10 years is unrealistic and unjustifiable.

At the February 2, 2021 public hearing for the Lehigh Hanson aggregate pit,

Rocky View Councillors stated that the Bearspaw ASP should have been updated to allow planning for the highest and best use. Councillors agreed heavy industrial (aggregate) is not compatible with country residential. Lehigh Hanson proposal for 25 years is a lifetime for most residences and one Councillor said for them.

Burnco 6-7km Cochrane West phases.

2011 RV approved Phase A1-A5 and A7 as the applicant stated the pit would last as a 10-year pit. Now 10 years later the gravel pit is still working on phase A1 and has huge mountains of gravel. Applicant stated that the current market is 100,000 to 150,000 tons /year. Given the 15 million tons, the proposed gravel pit may last 150 years.

<!--[if !vml]--><!--[endif]-->

Ann McKendrick McNabb



Ann McKendrick McNabb



Karen Jiang

From: Dominic Kazmierczak
Sent: February 16, 2021 1:07 PM
To: Legislative Services Shared
Cc: Steve Seroya
Subject: FW: [EXTERNAL] - MDP Public Hearing

Hi All,

Steve received this from a developer in the County. As it's suggesting amendments to the MDP, I'd suggest it's included in the public hearing emails for Council's consideration.

Thanks,
Dom

DOMINIC KAZMIERCZAK
Manager | Planning Policy

ROCKY VIEW COUNTY
262075 Rocky View Point | Rocky View County | AB | T4A 0X2
Phone: 403-520-6291
DKazmierczak@rockyview.ca | www.rockyview.ca

This e-mail, including any attachments, may contain information that is privileged and confidential. If you are not the intended recipient, any dissemination, distribution or copying of this information is prohibited and unlawful. If you received this communication in error, please reply immediately to let me know and then delete this e-mail. Thank you.

From: Steve Seroya <SSeroya@rockyview.ca>
Sent: February 16, 2021 12:11 PM
To: Dominic Kazmierczak <DKazmierczak@rockyview.ca>
Subject: FW: [EXTERNAL] - MDP Public Hearing

From: Asad Niazi <[REDACTED]>
Sent: February 16, 2021 12:08 PM
To: Steve Seroya <SSeroya@rockyview.ca>
Subject: [EXTERNAL] - MDP Public Hearing

Do not open links or attachments unless sender and content are known.

Hello Steve ,
Watching the MDP public hearing and noticed the following section related to our CN ASP. Interesting statement circled. RVC is investing in the utilities while stating that they may not prioritize upgrades of servicing. I feel that the statement is contrary to RVC maximizing its investments. I suggest that this statement be taken out from the MDP, could be a risk for RVC in pursuing any upgrades.

- iv) Form, quality, design, and compatibility of proposed development;
 - v) Potential for enhancements to main streets, commercial areas, and community gathering places;
 - vi) Provision of parks, open space, amenities, and pathway connections;
 - vii) Impact on the environment and mitigation measures;
 - viii) Interface design with adjacent land uses; and
 - ix) Provision for future regional transit connections; and
 - x) Intermunicipal collaboration on key cross-boundary concerns.
- d) Encourage a variety of housing forms to be developed in Hamlet Growth Areas in order to provide a range of affordability and lifestyle opportunities for residents.
- e) Encourage well-designed public gathering places that:
- i) Are pedestrian and cyclist-friendly, safe, accessible, and attractive;
 - ii) Respect and enhance community identity and character;
 - iii) Address the needs of residents of all ages and abilities; and
 - iv) Enable passive and active recreation and cultural activities.
- f) The expansion of a Hamlet Growth Area boundary should only be considered when 50% of the gross area has been developed, and shall require an amendment to the local area structure plan.
- g) The County should develop main street commercial guidelines and future development should comply with these guidelines.
- h) Hamlet main streets or central business areas are encouraged to develop with a consistent urban design theme that is pedestrian friendly.

2.5.2 Small Hamlets

Hamlets across Rocky View County range from those with a wide variety of services and relatively steady growth, like Hamlet Growth Areas, to those with fewer services and lower levels of growth. These Small Hamlets include Bottrel, Cochrane Lake, Dalemead, Dalroy, Delacour, Indus, Kathryn, Keoma, Indus, and Madden. They form a traditional part of the County's rural landscape, each with their own distinct character. The County will continue to maintain existing levels of service for these rural communities, ensuring sustained quality of life for residents. Due to their more isolated location, and the availability of more sustainable development locations across the county, the County may not prioritize infrastructure and servicing upgrades in Small Hamlets. However, additional growth that is in keeping with the character of these hamlets is appropriate.

- a) New development should occur within the existing hamlet boundary as opposed to expanding boundaries.
- b) Commercial development, if appropriately scaled to the surrounding area, should be supported to provide services to meet the day-to-day needs of residents or local businesses.
- c) Development of Small Hamlets should be guided by, and conform to, the existing applicable area structure plan or conceptual scheme.
- d) Development of Small Hamlets without an existing applicable area structure plan or conceptual scheme should be guided by the policies and direction of the MDP, and other applicable County policies and bylaws.
- e) Encourage a variety of housing forms to be developed in Small Hamlets in order to provide a range of affordability and lifestyle opportunities for residents.

Regards,

Asad Niazi, P.Eng., MBA



#127, 18 Royal Vista Link NW, Calgary AB, T3R 0K4

O: 403.239.1952

C: [REDACTED]
E: [REDACTED]

www.canopylands.com

Your dreams are not big enough if they don't scare you

From: [REDACTED]
To: [Public Hearings Shared](#)
Subject: Fwd: [EXTERNAL] - MDP Bylaw C-8090-2020
Date: Tuesday, February 16, 2021 9:20:01 AM

----- Forwarded message -----

From: <MMitton@rockyview.ca>
Date: Tue, Feb 16, 2021 at 9:01 AM
Subject: RE: [EXTERNAL] - MDP Bylaw C-8090-2020
To: [REDACTED], <LegislativeServices@rockyview.ca>

Good morning,

Please submit your comments to publichearings@rockyview.ca

Thank you,

Michelle

Michelle Mitton, M.Sc
Legislative Coordinator – Legislative Services

Rocky View County

262075 Rocky View Point | Rocky View County | AB | T4A 0X2

Phone: 403-520- 1290 |

MMitton@rockyview.ca | www.rockyview.ca

From: Karen Singer [REDACTED]
Sent: Tuesday, February 16, 2021 9:00 AM
To: Legislative Services Shared <LegislativeServices@rockyview.ca>
Subject: [EXTERNAL] - MDP Bylaw C-8090-2020

Do not open links or attachments unless sender and content are known.

Hello my name is Karen Singer. I live at SW 1/4 29 28 03 w 5th, which is located in the NW area of RVC.

I do not fully support the final Draft of the MDP, therefore, I ask that the Draft MDP as presented would be rejected. I have made recommended changes for your careful consideration and would ask that you adopt these recommendations into the next draft of the MDP.

My main area of concern is focused on the preservation and protection of rural agricultural

areas. Agriculture is important, but more importantly, agriculture is vital. It's a vital food supply for people and the livestock we raise and care for.

Section 1 - Introduction

1.3 Vision and Guiding Principles

Guiding Principles

4. Agriculture

Rocky View County will continue to support traditional agriculture and agricultural diversification and innovation, recognizing agriculture as **an important** part of the County's identity and economy. Rocky View County will encourage opportunities for value added agricultural businesses to develop and grow

Recommendation: Replace the words "an important" with "a vital".

1.4 Rocky View County Context

Half way into the first paragraph on page 5: In the County's western reaches, coniferous forests of the Rocky Mountain Foothills **transition to rolling hills scattered with ranches. Moving eastward, the foothills give way to prairie grasslands and wetlands.** Eastern Rocky View County is dominated with agricultural operations, including the production of hay, cereal and oilseed crops.

Recommendation: Re-word the highlighted section because the way it's written is somewhat misleading. The vast majority of this area of Rocky View is predominantly Agricultural / Farming. This is not currently worded in a way that depicts the actual occupancy of the lands going west to east.

1.6 The Planning Framework

1.6.4 Non-Statutory Plans Land Use Bylaw

The Land Use Bylaw is a regulatory bylaw of the County required by the Municipal Government Act. Every parcel of land in the County has a land use district, and the Land Use Bylaw details the permitted and discretionary land uses in each district and regulates the development of land and buildings within the county.

Recommendation: Add a policy enabling Council to approve the redistricting of lands by a non-owner. (See [Laux & Stuart-Palmer](#), Status to Apply, Duty to Process an Application, January 2019 Planning Law and Practice in Alberta). Redistricted Lands that have subsequently been verified and proved to be in violation of the MDP, should face a redesignation re-evaluation, enabling an appeal if demanded.

Section 2 - Land Use Policies

2.2 Growth Areas

Figure 2: Growth Concept Map Identifying Priority Areas for Growth

Recommendation: Add Agricultural Areas to the legend on the map indicating those areas are recognized and accounted for.

Sentence at bottom (left column) of page15: The Growth Concept Map identifies other areas that need to be considered when planning for additional growth:

Recommendation: Add Agricultural Lands to the list, along with Ecological Features, Waterbodies, Provincial Parks.

Top of page 15: Ecological Features: These potentially important ecological features include wetlands, riparian areas, **valuable agricultural soils**, and wildlife corridors. These areas may not be appropriate for additional development, and should be considered when area structure plans and conceptual schemes are created or amended.

Recommendation: Valuable agricultural soils should not be a courteous mention in between the commas of other Ecological Features. Valuable Agricultural (soils) Land should have a heading and paragraph of its own and listed separately. Throughout the County the invaluable Ecological Features are so often fit in together with the Agricultural Areas.

Additionally, a general ASP should be developed for the NW and NE sections of the County in order to guide and direct County decisions on the different types of applications being submitted for Land Redesignations or Developments.

Page 15: Sourcewater protection is of particular concern when identifying and protecting ecological features. Section 3.5 contains policies for development in and near ecological features.

Recommendation: Define Sourcewater. Is it the same as groundwater, surface water, or a water body like a lake, slough, creek or river?

Page 15: Waterbodies: These rivers, streams, and large wetlands provide aesthetic and ecological benefits. Future development should avoid or mitigate impacts to these areas

Recommendations: Groundwater sources (aquifers) should also be included in the list of waterbodies. More emphasis needs to be given to the size of development and its intended water demand. Extra scrutiny is needed in agricultural areas where farmers and families use well water for agricultural operations, for their livestock, and for their household use. Everyone in rural areas rely on water from the aquifer through a well system, and a large development could be devastating.

2.3 Residential Development

2.3.1 Primary Residential Areas, 2.3.2 Country Residential Development, 2.3.3 Fragmented Country Residential Development

Recommendation: This entire section and their sub-sections should be re-written to provide better clarity. It is very confusing and hard to follow. Definitions need to be provided to precisely differentiate the differences between these areas and types of development.

Additional Recommendations for this section:

2.3.1 Primary Residential Areas

b) New development may occur outside of identified priority growth areas with Council review and approval.

Recommendation: Reword to include - New development may occur outside of identified priority growth areas with Council review and approval, if appropriate and shall be compatible with the surrounding area.

2.3.2 Country Residential Development

b) Where *residential development* with two or more dwelling units and greater than 4 hectares (9.9 acres) is proposed... Council should give consideration to:

Recommendation: Add bullet point about Water. Consider the impact on the water usage the development will have and how it would affect the groundwater (aquifer) and ability for groundwater recharge. Wells in the surrounding area need to be protected.

2.3.3 Fragmented Country Residential Development

a) Within a *fragmented quarter section*, the redesignation of residential lots or **agricultural parcels** less than or equal to 4 hectares (9.9 acres) in size to a new residential land use may be supported if planning, consultation, and technical assessment information is provided to the satisfaction of the County and:

Recommendation: define agricultural parcel. Consider rewording this sentence for better clarity. Remove the words "agricultural parcels" and replace with "rural lands". Is the word 'agricultural parcel' a generic term used to describe all lands outside of a Hamlet, Town or City regardless of the zoning, or is it referring to 'agricultural parcels' that have a land designation for Agricultural use?

c) Within a *fragmented quarter section*, the redesignation or subdivision of **agriculture parcels** greater than 4 hectares (9.9 acres) in size to a residential use should not be supported.

Recommendation: Define "agricultural parcel". Remove the words "agriculture parcels" and replace with "rural lands"

Section 3 - County-Wide Policies

3.1.1 Financial Sustainability Policies

4. h) **Prior to approving** a development proposal, the County should ensure that **infrastructure servicing has been identified and planned for, and that** full cost recovery methods are in place to capture the capital and interest cost of development.

Recommendation: A policy should be implemented to ensure that prior to approving a development proposal, the Application for a development or land redesignation has met all the requirements of the MDP through an internal vetting process or other type of screening process in the Planning Department. This thorough vetting policy will save countless hours of work and associated financial costs associated with a long SDAB Appeal hearing for a development that should have had its Land Redesignation Application or its Conditional Development Permit rejected, due to its violations in the MDP. If the Planning Department doesn't screen out Applications that do not meet the MDP objectives and policies, then the affected neighbors and other persons affected will be relied upon to catch the error and appeal it. This should not happen.

j) Facilitate economic development **by linking** investors and developers to investment opportunities,

providing assistance where feasible, and reducing barriers to companies wishing to invest in the County.

Recommendation: I recommend reconsidering this idea and removing it. I think it's an unwise policy and ripe, in my opinion, for potential lawsuits. In the event that RVC "facilitates" and "links" a developer to an investor and the business relationship were to reach an impassable disagreement, then what potential liability would RVC open themselves up to as a result?

3.2.1 Transportation Planning and Development

i) Residential redesignation and subdivision applications should provide for development that:

Recommendation: Subdivisions and other business developments should not be approved unless the access road to the Subdivision or Business Development is a paved access road. The road should be upgraded in relation to the increased volume of traffic accessing the Subdivision or Business Development.

9.

3.4 Agriculture

Objectives

The policies within the Agriculture Policy Area are to ensure the following objectives:

- The agriculture sector remains an important component of the county's economy.

Recommendation: Replace the words "an important" with the words "a vital". Food is vital, not important - for people and livestock alike.

- Adverse impacts on agriculture from non- agricultural land uses are minimized

Recommendation: Replace the word "minimized" to "discouraged". The definition of the word "minimized" is open to interpretation and meaning.

3.5 Environment

1. Objectives

The policies within the Environment Policy Area are to ensure the following objectives:

- Drinking water sources are protected.

Recommendation: Add groundwater (aquifers) and groundwater recharge areas to the bullet point list. Groundwater should be protected in rural area communities because they rely solely on their well water supply (drawn from groundwater) for their domestic water use in their home, as well as their Agricultural and Livestock Operations. Ground water recharge areas need to be protected in order to maintain the groundwater levels.

From: [REDACTED]
To: [Public Hearings Shared](#)
Subject: [EXTERNAL] - Bylaw C-8090-2020 question
Date: Tuesday, February 16, 2021 10:25:31 AM

Do not open links or attachments unless sender and content are known.

Clarification request on how CMRB has been followed in not breaking up Commercial area , CMRB recommended to use current areas; rural urban sprawl should be added to current hamlets or develop a hamlet with their own water and waste water management, transportation corridors for both freight and commuter, ect. What is the water and waste water plan for growth areas, where is the water coming from and waste going to for growth areas?

Deb Vickery

Debbie Vickery

Sent from my iPad

If there are spelling/punctuation errors in my message, please forgive the smartness of my iPad..

From: [REDACTED]
To: [Public Hearings Shared](#)
Subject: [EXTERNAL] - Re: Bylaw C-8090-2020 question
Date: Tuesday, February 16, 2021 11:44:22 AM

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We Garth VICKERY and Debbie VICKERY agree and support Ena Spalding non-support of the MDP.
Springbank Resident 's

Debbie Vickery

Sent from my iPad

If there are spelling/punctuation errors in my message, please forgive the smartness of my iPad..

On Feb 16, 2021, at 10:25 AM, Debbie Vickery [REDACTED] wrote:

Clarification request on how CMRB has been followed in not breaking up Commercial area , CMRB recommended to use current areas; rural urban sprawl should be added to current hamlets or develop a hamlet with their own water and waste water management, transportation corridors for both freight and commuter, ect. What is the water and waste water plan for growth areas, where is the water coming from and waste going to for growth areas?
Deb Vickery

Debbie Vickery

Sent from my iPad

If there are spelling/punctuation errors in my message, please forgive the smartness of my iPad..

From: [REDACTED]
To: [Public Hearings Shared](#)
Subject: [EXTERNAL] - BYLAW C-8090-2020 Mr. Martin Griggs presentation supported!
Date: Tuesday, February 16, 2021 11:55:22 AM

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Mr. Martin Griggs presentation supported!
Debbie and Garth VICKERY
Springbank residents

Debbie Vickery

Sent from my iPad

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From: [REDACTED]
To: [Public Hearings Shared](#)
Subject: [EXTERNAL] - Bylaw C-8090-2020
Date: Tuesday, February 16, 2021 12:02:06 PM

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Janet Ballantyne presentation supported!
Debbie and Garth VICKERY
Springbank residents

Debbie Vickery

Sent from my iPad

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From: [REDACTED]
To: [Public Hearings Shared](#)
Subject: [EXTERNAL] - Bylaw C-8090-2020
Date: Tuesday, February 16, 2021 1:41:47 PM

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We support all 10 presenters that are not in favour of the MDP !
Do not accept this MDP and take all presenters presentations to incorporate all points for for a revised MDP.
Remember that the presentations by Ena Spalding and Janet Ballantyne have spoken on behalf of just under 1000 Springbank Residences!
Please do not a accept the MDP .
Debbie and Garth VICKERY
Springbank residence

Debbie Vickery

Sent from my iPad

If there are spelling/punctuation errors in my message, please forgive the smartness of my iPad..

From: [REDACTED]
To: [Public Hearings Shared](#)
Cc: [Legislative Services Shared](#)
Subject: [EXTERNAL] - New Municipal Development Plan Bylaw C - 8090.2020
Date: Tuesday, February 16, 2021 1:09:53 PM
Importance: High

Do not open links or attachments unless sender and content are known.

To publichearings@rockyview.ca
CC legislativeservices@rockyview.ca

Stewardship of Groundwater:

Currently, Rocky View County Land use does not consider water in decisions yet resulting mitigation costs are covered by Tax Dollars. These budgets are being stressed. Mandatory Guidelines should be included in the New Development Plan. The Calgary Metropolitan Region Board Growth and Servicing Plan gives considerable attention to water. Limited groundwater resources are being additionally stressed due to Development and the Provincial Boss Order that mandates no NEW Surface Water be licensed.

There should be protection for the following:

1. Confined and unconfined aquifers in slow recharge water deficient areas.
2. Paskapoo Formation Areas of Recharge.
3. Areas that don't have access to surface water.

The Province legislated Water Councils to facilitate the 'Water for Life Strategy' but no Council was set up to support Groundwater users.

The Province is responsible for licensing water diversions but does not accept "INDIRECTLY AFFECTED" Statements of Concern. The Paskapoo Formation groundwater system is complex and Indirectly Connected. The province deems Indirectly Affected users concerns to not be valid.

Recreational Zoned Areas:

The Plan should include mandatory feasibility guidelines: eg; facilities drawing a large influx of people should be close to service centres.

Rob Watson
NE / 31 / 28 / 03 / 05

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Municipal Development Plan C-8090-2020

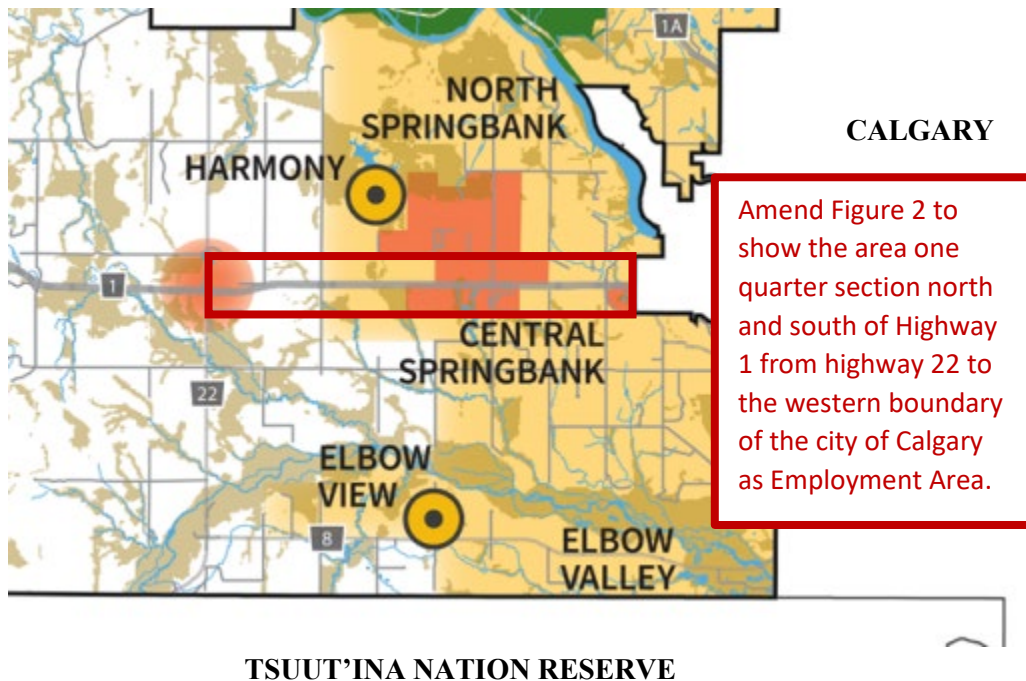
Attachment 'D'

Proposed Council and Administration Motions

A. NEW EMPLOYMENT AREA

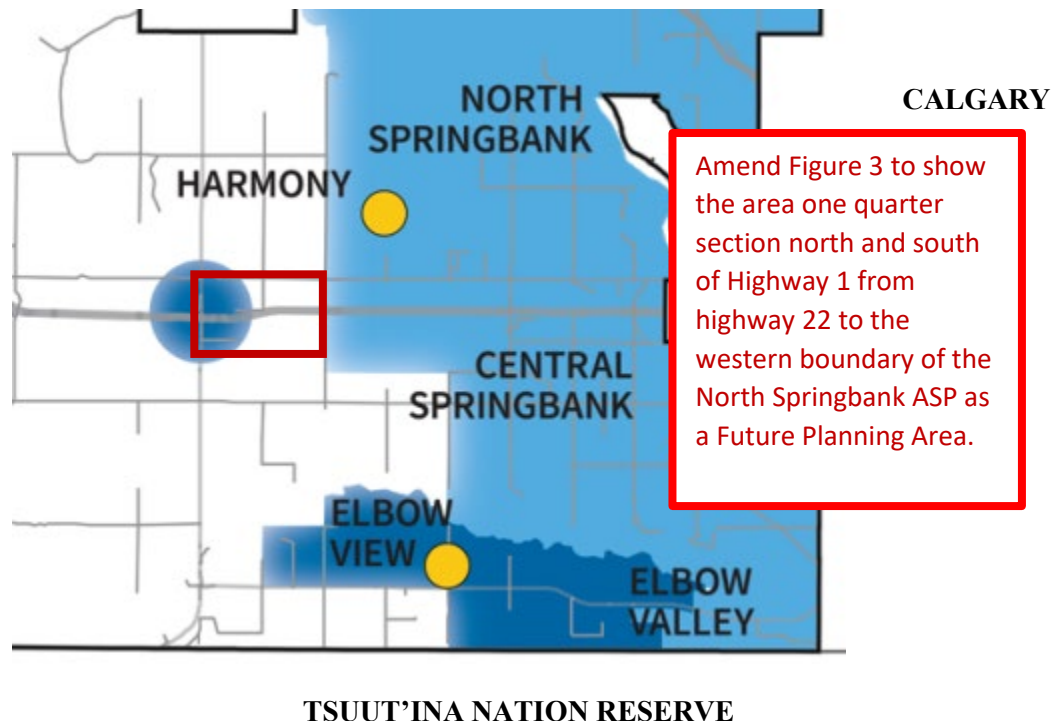
Deputy Reeve McKylor**Motion #1**

THAT Figure 2 of Bylaw C-8090-2020 be amended to show the area one quarter section north and south of Highway 1, between the western boundary of the city of Calgary and the Highway 1/22 intersection, as an Employment Area, which presently shows:



Motion #2

THAT Figure 3 of Bylaw C-8090-2020 be amended to show the area one quarter section north and south of Highway 1, between the western boundary of the adopted North Springbank Area Structure Plan and the Highway 1/22 intersection, as a Future Planning Area, which presently shows:



Administration's Comments: The current County Plan supports employment uses in close proximity to the key intersections along highway corridors and defines these areas as Highway Business Areas. Providing the potential for employment uses away from these intersections and outside of the Springbank Airport Regional Business Centre may result in issues of compatibility or interface for existing country residential land uses near to the highway corridor. Providing a strip of employment uses away from the intersections may also introduce transportation and access challenges for the business uses and existing residents.

Importantly, the addition of further employment uses within the Springbank ASP area is likely to inhibit the success of existing and proposed business uses around the Highway intersections and Airport by providing competition and resulting in a dispersed pattern of employment uses. The proposed Springbank ASPs have been developed around retaining rural character and promoting a scenic corridor along Highway 1, with cluster residential development proposed to facilitate this vision. Therefore, the proposed amendment is incompatible with the policies and land use framework provided within the proposed Springbank ASPs.

In engaging with Springbank landowners and residents during the ASP process, there has not been a desire for business uses along the Highway corridor away from the intersections and Springbank Airport.

Administration does not recommend that this motion is passed.

B. CONFINED FEEDING OPERATIONS

Deputy Reeve McKylor's Version

Motion #2(a) THAT policy 3.4.3(b) of Bylaw C-8090-2020 be amended as follows:

A confined feeding operation, including its minimum distance of separation, should shall not be located within the boundary or notification zone of any intermunicipal development plan adopted with a neighbouring urban municipality, or any statutory planning area, hamlet, residential area, institutional use, or federal, provincial, or municipal park or recreation area, but shall be considered within the boundary of neighbouring rural municipalities.

Administration's Version

Motion #2(b) THAT policy 3.4.3(b) of Bylaw C-8090-2020 be amended as follows:

A confined feeding operation, including its minimum distance of separation, should shall not be located within the boundary or notification zone of any intermunicipal development plan adopted with a neighbouring urban municipality, or any statutory planning area, hamlet, residential area, institutional use, or federal, provincial, or municipal park or recreation area.

Administration's Comments: No concerns on overall amendment. Administration would suggest removing the amendment to the final line of the policy as the previous amendments already achieve the goal of allowing consideration of confined feeding operations within proximity to municipal boundaries with rural municipalities.

C. EMPLOYMENT AREA DEVELOPMENT

Councillor Hanson

Motion #3 THAT policies 2.4.1 a), c), e), and f) ix) of Bylaw C-8090-2020 be amended to replace "should" with "shall" in all instances of its occurrence.

Administration's Comments: These amendments to the Employment Area Development section in the MDP would provide firmer direction to Council and Administration on the location and assessment of Employment Areas. Council should consider how much flexibility it desires in

making decisions on such uses. It is noted that “shall” statements are mandatory and leave no ability for Council to use discretion on the cited policies.

D. FINANCIAL SUSTAINABILITY

Councillor Hanson

Motion #4(a) THAT policies 3.1.1 a), d), e) and f) of Bylaw C-8090-2020 be amended to replace “should” with “shall” in all instances of its occurrence, and within the same Bylaw, that policy 3.1.1. k) be amended to replace “may” with “should” in all instances of its occurrence.

Councillor Wright

Motion #4(b) THAT policy 3.1.1 a) of Bylaw C-8090-2020 be amended to replace “should” with “shall” in all instances of its occurrence.

Motion #5 THAT policy 3.1.1 c) of Bylaw C-8090-2020 be amended to replace “may” with “shall” in all instances of its occurrence.

Administration’s Comments: These amendments to the Financial Sustainability section in the MDP would provide firmer direction to Council and Administration on the assessment of applications according to financial considerations. Council should determine how much flexibility it desires in considering such matters when making decisions on applications. It is noted that “shall” statements are mandatory and leave no ability for Council to use discretion on the cited policies.

E. ECOLOGICAL FEATURES

Councillor Boehlke

Motion #6

THAT Figure 2 of Bylaw C-8090-2020 be amended to remove the Ecological Features layer from the map and to remove reference to 'Ecological Features' from the legend.

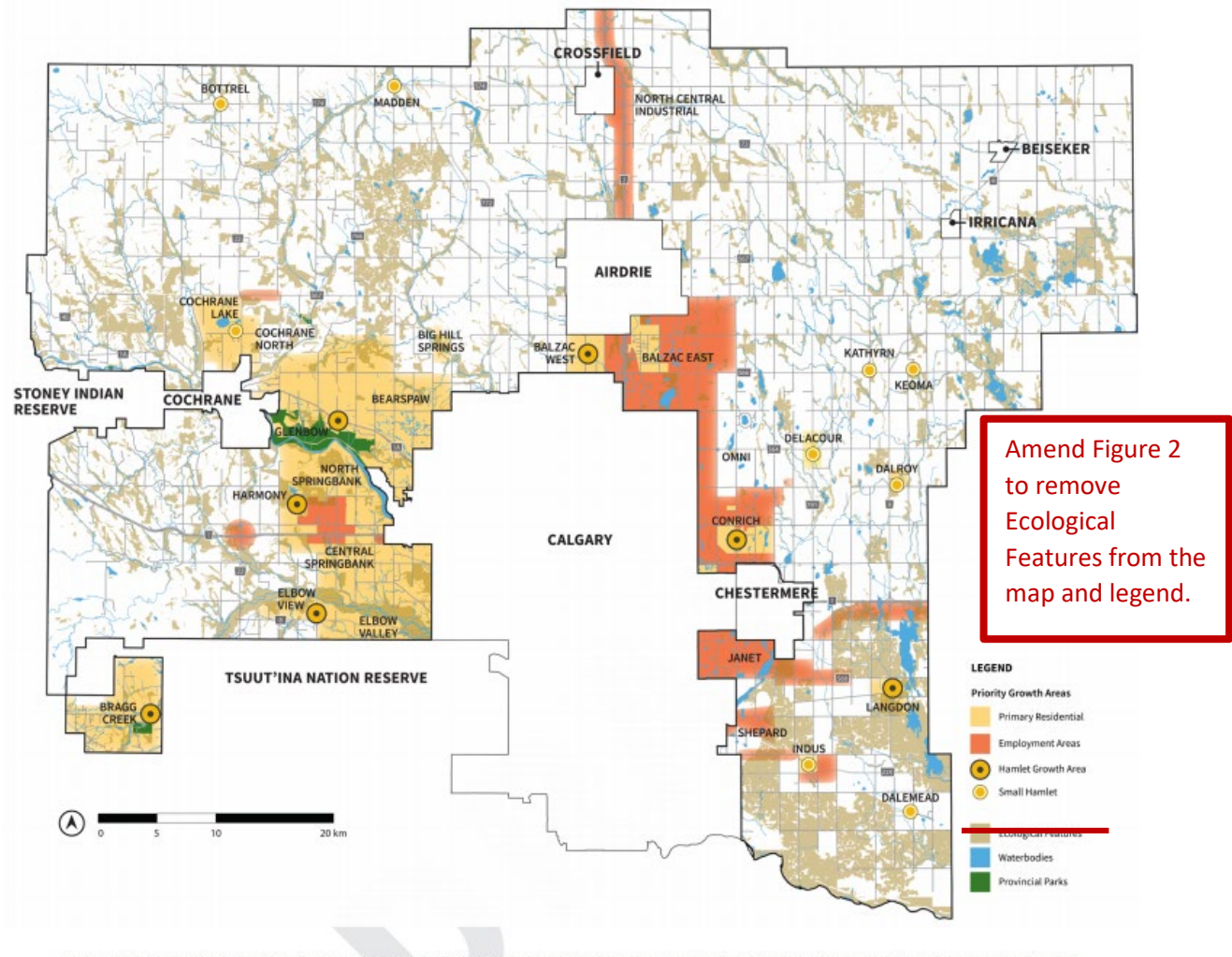


Figure 2: Growth Concept Map Identifying Priority Areas for Growth

This map is conceptual in nature, and is not intended to be used for measurements.

Motion #7 THAT section 2.2 of Bylaw C-8090-2020 be amended to remove the following text:

Ecological Features: These potentially important ecological features include wetlands, riparian areas, valuable agricultural soils, and wildlife corridors. These areas may not be appropriate for additional development, and should be considered when area structure plans and conceptual schemes are created or amended.

Sourcewater protection is of particular concern when identifying and protecting ecological features. *Section 3.5* contains policies for development in and near ecological features.

Administration Additional Motions

Motion #8 THAT section 2.2 of Bylaw C-8090-2020 be amended to remove the following text:

The map also highlights the presence of ecological features that warrant further study when development is proposed in these areas.

Motion #9 THAT policy 3.5.1(a) of Bylaw C-8090-2020 be amended as follows:

- a) Where development is proposed near potential *Ecological Features* ~~identified in the Growth Concept (Figure 2)~~, development applications may require the preparation and implementation of a bio-physical impact assessment to identify potential negative impacts and mitigation measures.

Administration's Comments: To achieve removal of any reference to the ecological features identified on Figure 2, Administration would suggest that amendment of two further sections within the MDP is also necessary (see Motions #8 and #9).

Councillor Wright

Motion #10 THAT section 3.5.1 of Bylaw C-8090-2020 be amended to replace "may" with "shall" as follows:

Where development is proposed near potential Ecological features identified in the Growth Concept (Figure 2), development applications ~~may~~ **shall** require the preparation and implementation of a bio-physical impact assessment to identify potential negative impacts and mitigation measures.

Administration's Comments: The current wording provides flexibility to refer back to the County Servicing Standards and other statutory plans such as area structure plans. The use of shall could create conflict with existing and proposed area structure plan requirements. If firmer wording is required, Administration suggests the use of "should" rather than "shall".

It is also recommended that if Motions 6 to 9 are passed by Council, the wording “identified in the Growth Concept (Figure 2)” be removed from the motion.

F. IMPLEMENTATION ACTIONS

Councillor Boehlke

- Motion #11** THAT Bylaw C-8090-2020 be amended to insert new policy 4.2 a) as follows, and to renumber subsequent policies accordingly:
- 4.2 a) Before any Actions identified in Table 02 are commenced, they shall have been brought before Council for approval with a report from Administration on the item, including assessment of budget impacts on the County.

Administration’s Comments: Some of these action items, such as updates to existing ASPs and Conceptual Schemes, are already ongoing and will have required prior Council approval. As some actions involve frequent or minor work, such as “Review and update the County’s Transportation Model”, Administration would suggest changing the direction in the policy from a “will/shall” to a “should” statement, to allow flexibility for minor work related to these actions.

G. PRIMARY RESIDENTIAL AREAS

Councillor Wright

- Motion #12** THAT section 2.3.1 of Bylaw C-8090-2020 be amended as follows:
- Primary residential areas comprise lands where residential development and ancillary commercial and light industrial development will be the predominant land use with ancillary contextually sensitive commercial and light industrial development.

Administration’s Comments: The intent of the policy as written is to provide for Primary Residential Areas that are mainly residential in nature, but which are also supported by secondary commercial and light industrial development. The proposed amendment appears to achieve the same goal, but could be interpreted to lessen the emphasis on commercial and light industrial as supporting uses. The addition of “contextually sensitive” also places emphasis on planning business uses that are compatible with existing/proposed residential uses.

Councillor Wright

- Motion #13** THAT policies 2.3.1 e), f), and h) of Bylaw C-8090-2020 be amended to replace “should” with “shall” in all instances of its occurrence.

Administration's Comments: These amendments would provide firmer direction to Council and Administration on the requirement for the identified Primary Residential Areas to be guided by an Area Structure Plan or Conceptual Scheme, and also on the content of these Plans. It is noted that "shall" statements are mandatory and leave no ability for Council to use discretion on the cited policies.

Councillor Wright's version

Motion #14(a) THAT policy 2.3.1 h) vii) of Bylaw C-8090-2020 be amended as follows:

- vii) Where the ASP is located in ~~areas adjacent to an~~ **within 1km of an adjacent** intermunicipal partner, appropriate intermunicipal collaboration on key cross-boundary concerns.

Administration's Version

Motion #14(b) THAT policy 2.3.1 h) vii) of Bylaw C-8090-2020 be amended as follows:

- vii) Where the ASP is located in areas near to an intermunicipal partner, appropriate intermunicipal collaboration on key cross-boundary concerns.

Administration's Comments: This relates to the Primary Residential Areas section and the matters to be addressed within new ASPs. Intermunicipal collaboration is guided by the regional policy framework and Intermunicipal Development Plans, both of which sit above the Municipal Development Plan in the hierarchy of statutory plans. These higher order plans may dictate collaboration on a wider scale than the one kilometre suggested. "Adjacent" was used to refer to ASPs adjoining or near to intermunicipal partners and to allow some flexibility to account for other statutory plans; however, Administration has proposed different wording in an attempt to meet the original goal of the amendment (see 9(b)).

H. GROWTH AREAS

Councillor Kissel

Motion #15 THAT section 2.2 of Bylaw C-8090-2020 be amended as follows:

New development ~~may occur~~ **shall be discouraged** outside of the identified priority growth areas, ~~however,~~ **but may be considered with public consultation and surrounding neighbour support for** Council review and approval. The map also highlights the presence of ~~ecological features~~ **environmental features, agricultural areas, and natural resource areas**, that warrant further study when development is proposed in these growth areas.

Administration Additional Motions

Motion #16 THAT policy 2.3.1 b) of Bylaw C-8090-2020 be amended as follows:

- b) New development ~~may occur~~ **shall be discouraged** outside of identified priority growth areas, **but may be considered for** ~~with~~

Council review and approval, **subject to prior public engagement being undertaken and support from affected landowners being obtained.**

Administration's Comments: This amendment would provide firmer direction on the location of growth areas and the allowance of growth outside of the priority growth areas. The original motion proposes amendments to the preamble of section 2.2 Growth Areas; Administration has provided a further policy amendment suggestion to help achieve the intended goal of the Councillor's motion.

I. FRAGMENTED COUNTRY RESIDENTIAL DEVELOPMENT

Councillor Kissel

Motion #17 THAT section 2.3.3 of Bylaw C-8090-2020 be amended to replace "should" with "shall" as follows:

Further fragmented country residential development should be avoided, and a gradual transition ~~should~~ **shall** be pursued to a more orderly and efficient development pattern within fragmented country residential areas.

Administration's Comments: This amendment relates to text preceding policies on fragmented country residential development. Although the text provides firmer wording, Administration has no concerns with this change as the policies clearly set out the MDP requirements for this form of development.

J. NEIGHBOURHOOD SERVING COMMERCIAL

Councillor Kissel

Motion #18 THAT policy 2.4.2 a) of Bylaw C-8090-2020 be amended to replace "should" with "shall" as follows:

- a) New neighbourhood-serving commercial and light industrial development ~~should~~ **shall**:
 - i) conform to the relevant area structure plan, and the policies of the MDP; and
 - ii) Have minimal impact on adjacent land uses.

Administration's Comments: These amendments would provide firmer direction to Council and Administration on the requirements for neighbourhood serving commercial development. While it is noted that "shall" statements are mandatory, in this case, the deferral of assessing compliance with other statutory plan policies allows for some flexibility in considering development proposals. Council would also have the discretion to determine what is considered to be "minimal impact" in making decisions of this type of development.

K. HAMLET DEVELOPMENT

Councillor Wright

Motion #19 THAT section 2.5 of Bylaw C-8090-2020 be amended as follows:

Over the next 20 years, it is anticipated that Rocky View's hamlets are will be home to the majority of the County's residents and will provide services for their residents' everyday needs.

Administration's Comments: This relates to the Hamlet Development section. No comments.

Councillor Wright

Motion #20 THAT section 2.5.1 of Bylaw C-8090-2020 be amended as follows:

Hamlets in Rocky View County vary in size, appearance, and function, with each hamlet having a distinct character that reflects its location, history, and environment. Of these hamlets, Balzac West, Bragg Creek, Conrich, ~~Elbow View~~, Glenbow Ranch, Harmony, and Langdon are recognized as Hamlet Growth Areas (as identified on Figure 2). These Hamlet Growth Areas, both existing and planned, will include a mix of land uses to provide housing, employment, community services, and recreation opportunities to local residents and a larger service area. Additional growth in these hamlets may should be prioritized by the County due to their proximity to transportation networks, and availability of infrastructure, services, and amenities. Commercial uses will be supported in Hamlet Growth Areas to provide access to services for residents and provide employment opportunities.

Administration's Comments: No concerns on amendments. It is noted that although supported as a future Growth Hamlet by the draft MDP, the Elbow View ASP has yet to receive approval from Council or the CMRB.

Councillor Wright

Motion #21 THAT policies 2.5.1 a), b), c) and g) of Bylaw C-8090-2020 be amended to replace "should" with "shall" in all instances of its occurrence.

Administration's Comments: These amendments would provide firmer direction to Council and Administration on the requirement for identified Hamlet Growth Areas to be guided by an Area Structure Plan and Conceptual Scheme, and also on the content of these Plans. Amendment to policy 2.5.1 g) would also reduce flexibility on the application of hamlet design

guidelines. It is noted that “shall” statements are mandatory and leave no ability for Council to use discretion on the cited policies

Councillor Wright

Motion #22 THAT policies 2.5.2 c) and d) of Bylaw C-8090-2020 be amended to replace “should” with “shall” in all instances of its occurrence.

Administration’s Comments: These amendments would provide firmer direction to Council and Administration on the requirement for identified Small Hamlets to be guided by an Area Structure Plan or Conceptual Scheme. It is noted that “shall” statements are mandatory and leave no ability for Council to use discretion on the cited policies.

L. NATURAL RESOURCE DEVELOPMENT

Councillor Wright

Motion #23 THAT policy 3.3.1 a) of Bylaw C-8090-2020 be amended as follows:
3.3.1 a) ~~Minimize~~ **Avoid** the adverse impact of aggregate extraction on existing residents, adjacent land uses, and the environment.

Administration’s Comments: This amendment sets a very challenging standard for any aggregate development to meet within the County. The amendment is interpreted as requiring that no impacts are incurred by surrounding land uses, when practically, all development has some impact on surrounding amenity and the environment. The current wording allows Administration and Council to determine whether these impacts have been reduced to an appropriate level in accordance with other policies and requirements, rather than being prevented altogether. Administration does not recommend that this motion is passed.

Councillor Wright

Motion #24 THAT policy 3.3.1 g) of Bylaw C-8090-2020 be amended as follows:
g) Consider co-locating ~~other complementary industrial~~ **transitional land** uses adjacent to aggregate extraction sites.

Administration’s Comments: Administration has no comments or concerns in relation to this amendment.

Councillor Kissel

Motion #25 THAT section 3.3 of Bylaw C-8090-2020 be amended as follows:
Objectives

The policies within the Natural Resources Development Policy Area are to ensure the following objectives:

- Future natural resource extraction balances the needs of residents, industry, **society**, and the County.

Administration's Comments: Administration has no comments or concerns in relation to this amendment.

Councillor Kissel

- Motion #26(a)** THAT Bylaw C-8090-2020 be amended to insert new policy 3.3.1 i) as follows:
- i) Discourage aggregate extraction in areas of the County that are zoned Primary Residential or hamlet.

Administration Versions

- Motion #26(b)** THAT Bylaw C-8090-2020 be amended to insert new policy 3.3.1 i) as follows:
- i) Discourage aggregate extraction adjacent to lands which are designated for residential uses within Primary Residential or Hamlet Development Areas.

- Motion #26(c)** THAT Bylaw C-8090-2020 be amended to insert new policy 3.3.1 i) as follows:
- i) Discourage aggregate extraction within area structure plan or conceptual scheme areas that support Primary Residential or Hamlet Development.

Administration's Comments: Administration notes the intent of this policy addition to reduce the potential compatibility issues between aggregate and residential land uses. Administration has offered alternative wording to provide further definition on when aggregate development could be discouraged. The first would discourage aggregate extraction adjacent to lands designated for residential uses, while the second would be more restrictive in discouraging aggregate extraction where the adjacent lands are identified in the ASP or conceptual scheme for future residential uses.

M. TECHNICAL AND MASTER SITE DEVELOPMENT PLAN REQUIREMENTS

Councillor Wright

- Motion #27** THAT policy 3.3.1 f) of Bylaw C-8090-2020 be amended as follows:

- f) Applications for gravel extraction shall prepare a master site development plan that addresses the development review criteria located in Appendix C.

Motion #28

THAT the title of Appendix C of Bylaw C-8090-2020 be renamed as follows:

APPENDIX C: CONCEPTUAL SCHEME / MASTER SITE DEVELOPMENT PLAN REQUIREMENTS

Motion #29

THAT Bylaw C-8090-2020 be amended to insert a new section 4.4 to section 4 (Implementation and Monitoring) as follows:

4.4 Technical Requirements/Supporting Information

4.4.1 All planning or development applications, and any associated infrastructure construction should meet the technical requirements of the County Plan, Land Use Bylaw, area structure plans, subordinate plans, Servicing Standards, County Policy, and provincial and federal requirements. Request for variations from County requirements must include technical justification with all relevant studies, reports, and tests.

4.4.2 The County will make a decision to approve, approve with conditions, or deny a request to vary from County requirements as the County deems appropriate after reviewing all supporting information.

4.4.3 The County may require studies, reports, and tests to be submitted in support of any planning or development application.

4.4.4 Conceptual schemes and master site development plans required by this Plan should be required to provide information on, and evaluation of, the matters identified in Appendix C.

Motion #30

THAT Appendix C of Bylaw C-8090-2020 be amended to insert Table 05 as follows:

Master Site Development Plan Requirements

Master Site Development Plans should address the following items:

Table 05: Master Site Development Plan Requirements

1. A general introduction to the proposed development: a discussion of the vision and purpose of the proposal.
2. A master site plan addressing:
 - a) building placement and setbacks;

- b) building height and general architectural appearance;
 - c) parking and public lighting;
 - d) landscaping for visual appearance and/or mitigating measures;
 - e) agriculture boundary design guidelines; and
 - f) anticipated phasing.
3. A summary of the Applicant's community consultation and results.
 4. Technical issues identified by the County that are necessary to determine the project's viability and offsite impacts.

Motion #31

THAT Appendix C of Bylaw C-8090-2020 be amended to insert Table 06 as follows:

Aggregate Master Site Development Plan Requirements

Applications for aggregate extraction shall include a master site development plan that addresses the following:

Table 06: Aggregate Extraction Master Site Development Plan Requirements

1. A general introduction to the proposed development: a discussion of the vision and purpose of the proposal, summary of physical attributes of subject lands, site context overview, and guiding principles for development.
2. Development rationale including justification for proposed land use.
3. Summary of proposed operations including: site activities, proposed hours of operation, haul routes, etc.
4. Aggregate extraction guidelines and site development/aggregate extraction plan.
5. Phasing plan.
6. Development permitting structure which is to include monitoring and reporting requirements.
7. Reclamation plan.
8. Environmental mitigation strategies and initiatives including a summary of the use of sustainable technologies and initiatives during extraction and reclamation stages.
9. Identification of impacts to surrounding lands and mitigation strategies (may require landscaping and buffering strategies for effective screening and visual aesthetics).

10. Assessment of cumulative aspects of extraction activities in the area.
11. Summary of interim and post reclamation land uses – a discussion of land uses that may coincide with aggregate extraction (i.e. agricultural uses).
12. Any special policies that may be required to give guidance to the preparation of development proposals.
13. A technical summary of the proposal with supporting documentation that addresses:
 - a) transportation and access management (submission of a traffic impact assessment);
 - b) stormwater management (submission of a stormwater management plan);
 - c) ground and surface water hydrological analysis;
 - d) environmental overview (submission of a biophysical overview);
 - e) noise and dust mitigation strategies and reports; and
 - f) erosion and weed management control.
14. Supplementary information - any additional information that may help further define the proposal.
15. Summary of required Provincial Approvals. This could include: Alberta Environment Code of Practice, Alberta Environment wetland loss and mitigation approvals, Alberta Community Development historical resource clearance, Alberta Transportation roadside development permits, etc.
16. A summary of the Applicant's community consultation and results.
17. Any other item deemed appropriate by the County.

Administration's Comments: These proposed amendments would carry forward the existing technical requirements for master site development plans and submissions for aggregate development from the existing adopted County Plan. Administration does note that items set out within Appendix C and any other appendix in the MDP are considered to be part of the statutory plan; therefore, amendment to these items at a later date would require amendment to the MDP.

N. DEVELOPMENT IN HAZARD AREAS

Councillor Wright

Motion #32

THAT policy 3.5.5 e) of Bylaw C-8090-2020 be amended as follows:

- e) Proposed development within the floodway or flood fringe areas ~~should~~ **shall** provide a flood hazard risk study, including hazard mapping where appropriate and prepared by a qualified professional.

Administration's Comments: This would provide firmer wording around the requirements for a flood risk hazard study. The use of "shall" will provide a conflict with proposed wording within the Springbank Area Structure Plans, which use "should" statements around such studies; therefore, the amendment is not recommended by Administration.

O. IMPLEMENTING THE MDP

Councillor Wright

Motion #33 THAT policy 4.2 f) of Bylaw C-8090-2020 be amended as follows:

- f) The County ~~will should~~ **shall** monitor and report to council annually on the rate of development within area structure plans and conceptual plans, including the number of new dwellings, and dwelling types.

Motion #34 THAT policy 4.2 g) of Bylaw C-8090-2020 be amended as follows:

- g) When creating or amending area structure plans, the County shall include a policy requiring municipal review of the plans after ~~10~~ **5** years. ~~, and a review after 5 years if sufficient development has not been undertaken after 5 years of the plans approval.~~

Administration's Comments: Administration notes that current staff capacity and meeting other Council directed priorities makes it difficult to ensure annual reporting of development rates to Council. The use of "should" in the policy would allow flexibility for biennial reporting, where resources do not permit shorter timescales. The second motion referring to review of areas structure plans also removes the flexibility to undertake reviews according to the context of the plan area.

P. GLOSSARY

Councillor Wright

Motion #35 THAT Appendix A of Bylaw C-8090-2020 be amended to include the following definitions:

Designated Development Area means the Priority Growth Areas identified in the Growth Concept Map.

Concentrated Growth means growth that occurs within the Designated Development Areas of the Growth Concept Map.

Source Water means water in its natural or raw state, prior to withdrawal for treatment and distribution as a drinking water source.

Priority Growth Area means the areas identified in the Growth Concept Map for the prioritization of County investment in municipal infrastructure and the accommodation of additional growth over the MDP's planning horizon.

Administration's Comments: Administration has provided definitions for consideration within the motion.

Q. PROVINCIAL PARKS

Councillor Wright

Motion #36

THAT section 2.2 of Bylaw C-8090-2020 be amended as follows:

Provincial Parks: There are ~~two~~ **three** provincial parks in Rocky View County, Glenbow Ranch, **Bragg Creek**, and Big Hills Springs. Future development adjacent to these parks should mitigate any impacts to their environmental or recreation function.

Administration's Comments: Administration has no concerns in relation to this amendment.

R. AGRICULTURE

Councillor Kissel

Motion #37

THAT section 3.4 of Bylaw C-8090-2020 be amended as follows:

Objectives

- The agriculture sector remains an ~~important~~ **vital** component of the County's economy.
- Adverse impacts on agriculture from non-agriculture land uses are ~~minimized~~ **discouraged**.

Administration's Comments: This amendment relates to amendments to the objectives of the Agriculture section. With respect to the amendment to the second objective, this would result in wording more akin to a policy than an objective. Policy 3.4.1 e) stating "discourage intrusive and/or incompatible land uses in agricultural areas" already achieves a similar goal.

ADMINISTRATION MOTIONS

S. TABLING

Motion #37 THAT further consideration of Bylaw 8090-2020 be tabled until the April 27, 2021 Council meeting to allow for further collaboration with adjacent municipalities and First Nations.

Administration's Comments:

Administration considers that the County has undertaken a structured and thorough engagement process with intergovernmental partners in alignment with the *Municipal Government Act*, Interim Growth Plan, and relevant intermunicipal frameworks. It also considers that the final draft MDP document is in accordance with all legislation and statutory plans.

However, taking into account the outstanding concerns from some municipalities and First Nations, Council may wish to table the bylaw to allow Administration further time to address these items. It is noted that some items, such as the City of Airdrie's request for an Intermunicipal Collaboration Framework, may not be concluded within a timescale acceptable to Council.

T. FORMATTING AND CORRECTIONS

Motion #38 THAT Bylaw 8090-2020 be amended to correct grammar, formatting, numbering, and map labelling throughout.

Administration's Comments: This amendment would allow minor corrections to be made to the bylaw following comments received on items such as map labelling and typographical errors. This would improve overall clarity and interpretation of the document.

U. IMPACTS ON INFRASTRUCTURE AND SERVICES OF ADJACENT MUNICIPALITIES

Administration's version

Motion #39(a) THAT Bylaw C-8090-2020 be amended to insert new policy 4.1.2 (f) as follows:

Prior to approval of local plan and land use applications adjacent to another municipality, the County should consider the use of appropriate mechanisms, such as joint studies and infrastructure cost sharing agreements, to address cross boundary impacts identified by the County.

City of Airdrie's version

Motion #39(b) THAT Bylaw C-8090-2020 be amended to insert new policy 4.1.2 (f) as follows:

Prior to approval of local plan and land use applications adjacent to another municipality, the County shall use appropriate mechanisms, such as joint studies and infrastructure cost-sharing agreements, to address intermunicipal impacts.

Administration's Comments: This amendment would commit the County to working with adjacent municipalities to address cross boundary impacts through further studies and agreements, as required. The County already has numerous agreements in place with intermunicipal partners, so in many cases the policy is confirming the County's current practices. However, the policy does provide the expectation of further collaborative work being undertaken. Following discussions, the City of Airdrie has provided alternative wording for the motion for Council's consideration.

Motion #40 THAT Bylaw C-8090-2020 be amended to insert new policy 4.1.2 (g) as follows:

(g) The County shall ensure early collaboration is undertaken with adjacent municipalities to address cross-boundary concerns in the preparation of area structure plans, local plans and any other statutory document guided by this Plan.

Administration's Comments: This amendment would confirm the County's existing commitment to early collaboration with adjacent municipalities at all stages of the planning process.

V. IDENTIFYING PRIORITY GROWTH AREAS

Motion #40 THAT section 1.3, principle 1 of Bylaw C-8090-2020 be amended to replace "should" with "shall" as follows:

1. Rocky View County ~~should~~ shall concentrate growth within designated development areas, ensuring equitable services are provided to residents in a fiscally sustainable manner.

Motion #41 THAT section 2.4.1 Employment Areas of Bylaw C-8090-2020 be amended to replace "should" with "shall" in all instances of its occurrence.

Motion #42 THAT section 2.5.1 Hamlet Growth Areas of Bylaw C-8090-2020 be amended to replace "should" with "shall" in all instances of its occurrence.

- Motion #43** THAT Bylaw C-8090-2020 be amended to remove policy 2.3.1(b) in its entirety, which presently reads:
- b) New development may occur outside of identified priority growth areas with Council review and approval.

Administration's Comments: These amendments are a response to concerns raised by The City of Calgary and City of Airdrie in relation to the flexibility of the identified growth areas. The amendments would limit Council's discretion to consider new growth areas outside of those identified as Priority Growth Areas.

W. INTERFACE AND GATEWAYS

Administration's version

- Motion #44(a)** THAT Bylaw C-8090-2020 be amended to insert new policy 4.1.2 (h) as follows:
- (h) In preparing area structure plans and/or local plans, the County shall consider Intermunicipal Development Plans, Accords and any other statutory plans, which provide direction with respect to intermunicipal gateways, transition and interface; the County should address issues and opportunities through collaboration with the adjacent municipality.

City of Airdrie's Version

- Motion #44(b)** THAT Bylaw C-8090-2020 be amended to insert new policy 4.1.2 (h) as follows:
- (h) In preparing area structure plans and/or local plans, the County shall consider Intermunicipal Development Plans, Accords, and/or any other statutory plans which provide direction with respect to intermunicipal gateways, transitions and interface. The County shall address issues and opportunities for gateways, transitions and interface through collaboration with the applicable adjacent municipality or municipalities, as the case may apply.

Administration's Comments: This amendment specifically seeks to address interface, gateway and transition with adjacent municipalities and encourages collaboration to achieve this. The City of Airdrie has suggested alternative wording following circulation of the motions. Administration does not have concerns with the City's proposed amendment.

X. SOURCE WATER PROTECTION

Motion #45 THAT Bylaw C-8090-2020 be amended to insert new policy 4.1.2 (g) as follows:

- (g) The County should collaborate with adjacent municipalities to support the establishment of baseline conditions for infrastructure needs and environmental assets which assist in the planning and assessment of future growth and development.

Motion #46 THAT Bylaw C-8090-2020 be amended to insert a new definition to Appendix A: Glossary, for Baseline Conditions as follows:

Baseline conditions: conditions which provide a fixed point of reference through a study or assessment that can be used for comparison purposes when determining the real and expected changes over time within a defined geographical area.

Administration's Comments:

These amendments seek to address the specific concerns of The City of Calgary around source water protection. The City's comments contained in Attachment C of the agenda package refer to cumulative effects caused by development in the County upstream of The City. The City is yet to confirm whether these amendments resolve their concerns. Administration is reluctant to commit to assessing the cumulative effects of development when The City has not defined the scope of such assessments. Administration raises concern that policies requiring consideration of cumulative effects may lead to inaccurate conclusions and overestimations around the County's impacts on City infrastructure. Administration is also unaware of detailed cumulative effects studies that have been undertaken to assess The City's cross boundary impacts on County infrastructure, so would look for fairness in the consideration of any policy amendments.

The proposed motions would go beyond source water and encourage collaboration between the County and adjacent municipalities to establish infrastructure and environmental baselines that could be used to assess and monitor development within the County and the adjacent municipality.

Y. IDP GROWTH CORRIDORS

Motion #47

THAT Figure 2 of Bylaw C-8090-2020 be amended to remove Employment Areas from the City of Calgary Industrial Growth Corridor identified in the RVC/City of Calgary Intermunicipal Development Plan, which presently shows:

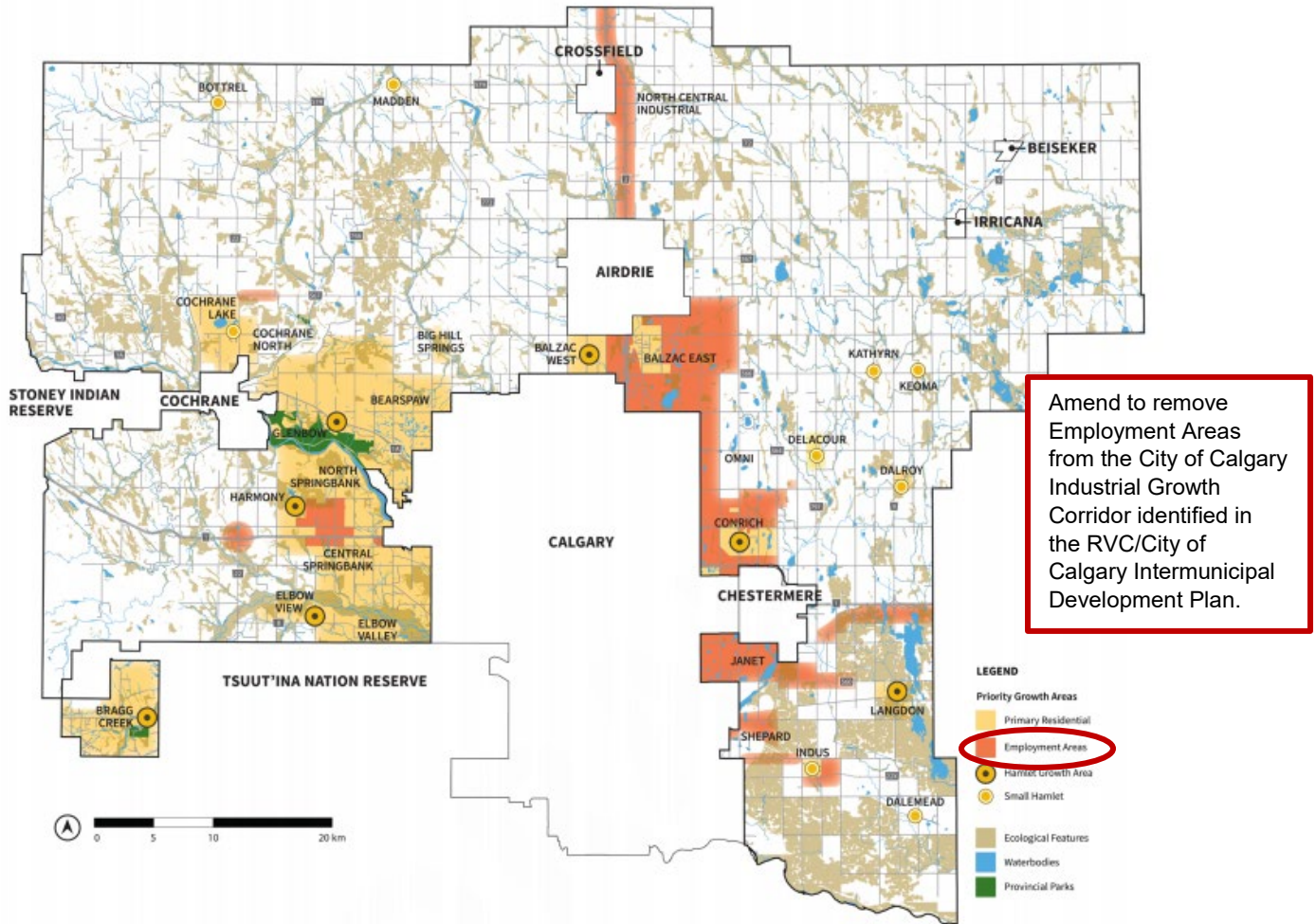


Figure 2: Growth Concept Map Identifying Priority Areas for Growth
 This map is conceptual in nature, and is not intended to be used for measurements.

Motion #48

THAT Figure 3 of Bylaw C-8090-2020 be amended to remove Future Planning Areas from the City of Calgary Industrial Growth Corridor identified in the RVC/City of Calgary Intermunicipal Development Plan, which presently shows:

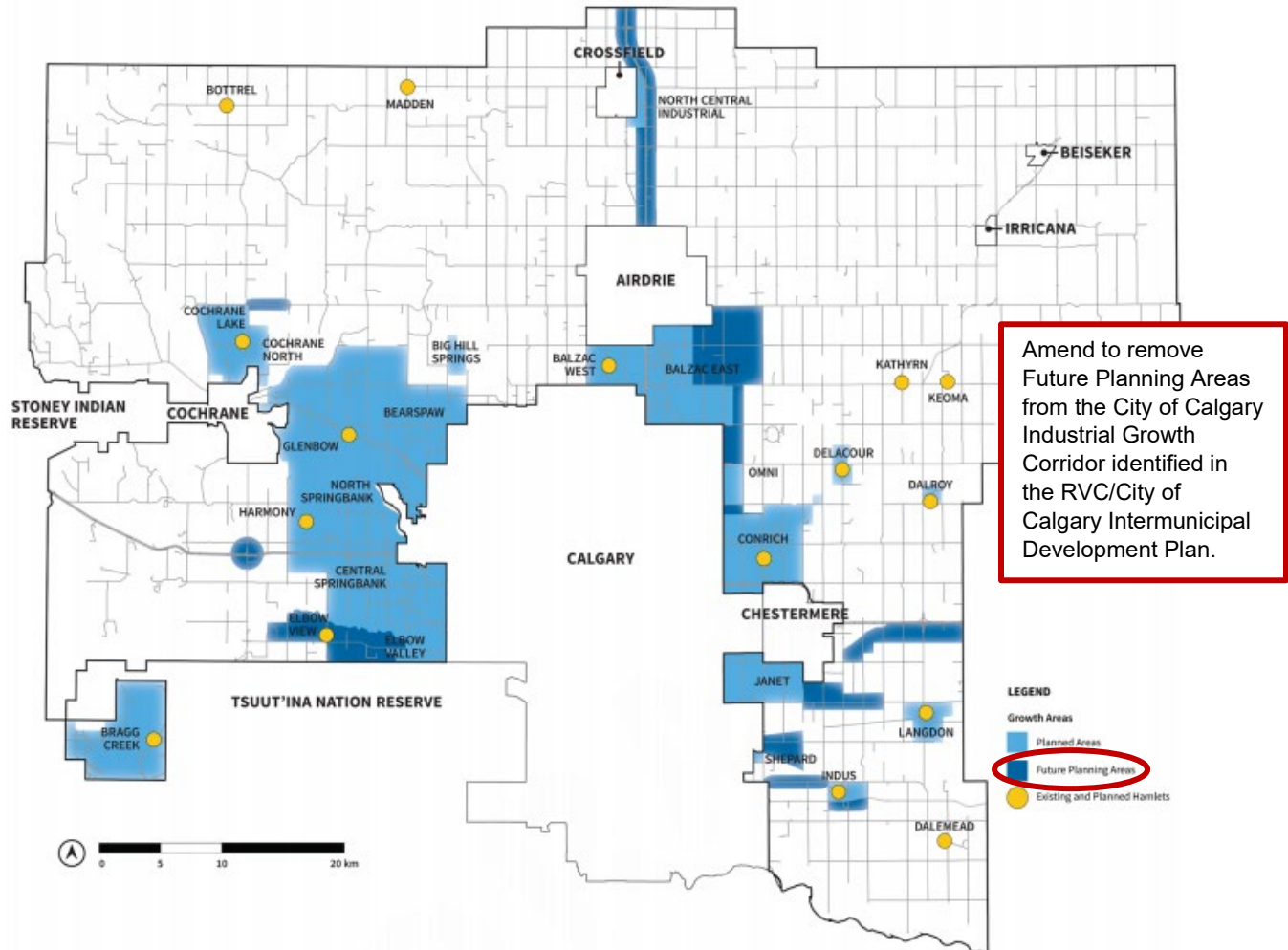


Figure 3: Planned and Future Planning Growth Priority Areas

This map is conceptual in nature, and is not intended to be used for measurements.

Administration's Comments:

These amendments seek to address the concerns of The City of Calgary in relation to the draft MDP identifying County growth areas within areas identified as City of Calgary Growth Corridors in the Intermunicipal Development Plan (IDP).

Administration has reviewed the IDP and considers that the policies contained within the document do not prevent the County from considering statutory plans or development proposals within the Growth Corridors. However, taking into account the significant opposition from The City on this matter, Council may wish to consider removal of County growth areas from the MDP maps as shown in the motions. This would remove policy support for the developer-led Shepard Industrial ASP currently being prepared and a future planning area identified along Highway 22.

Z. AGGREGATE EXTRACTION AND PROVINCIAL PARKS

Motion #49 THAT Bylaw C-8090-2020 be amended to insert new policy 3.3.1 (j) as follows:

- (j) Collaborate with Alberta Environment and Parks with the intent of establishing appropriate mechanisms to minimize potential impacts of aggregate extraction development on provincial parks, particularly with respect to surface and ground water effects.

Administration's Comments:

On February 16, 2021, the County received comments from Alberta Environment and Parks (AEP) on the draft MDP. Concern was raised over the impact of aggregate extraction operations on the Big Hill Springs Provincial Park, and AEP suggested the provision of setbacks for aggregate extraction from the Park to minimize impacts. Specific mention is made of protecting surface and groundwater, viewscales, vegetation, and wildlife assets.

In response, Administration has drafted a potential policy addition for Council's consideration. Given that the MDP is a high-level document, it is considered that reference to setbacks or other mitigation measures are best addressed through further collaboration with AEP and the implementation of more detailed Council policies or guidelines that speak to development around the Provincial Park.
