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

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 Internation.....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 ViewCounty
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**
>
> Do not open links or attachments unless sender and content are known.
>
> **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.

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
T0L 0K0
[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 Bearspaw 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 polices.
    - 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 form 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.

ELBOW VALLEY

Elbow Valley Residents Club
100 Misty Morning Drive
Calgary, AB T3Z 2Z7

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.

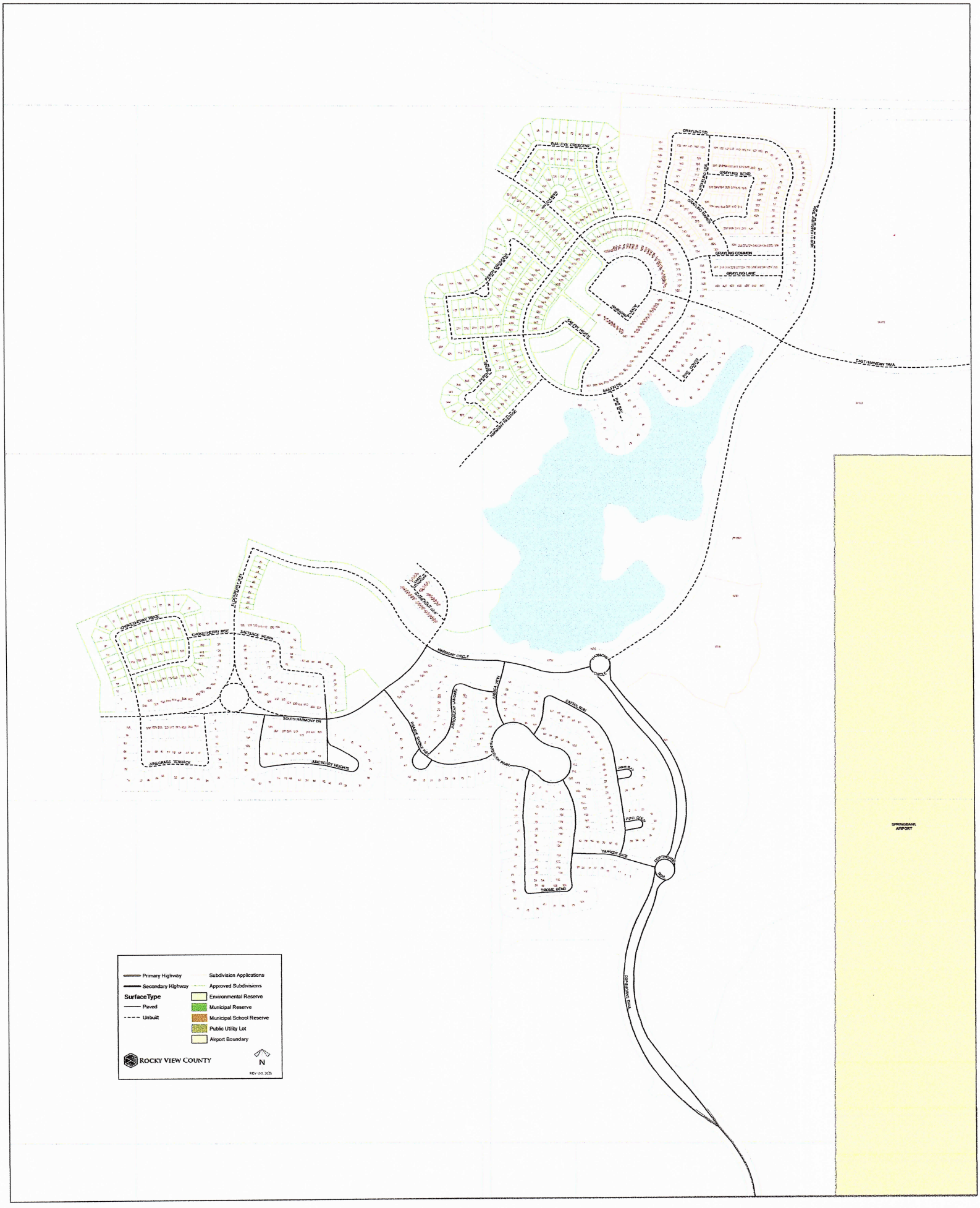
Regards,

ELBOW VALLEY RESIDENTS CLUB

Terry Brooker
President, Board of Directors
terry.brooker@elbowvalley.org

cc. dkazmierczak@rockyview.ca

COMMUNITY OF HARMONY AREA MAP



ATTACHMENT 'C': PUBLIC SUBMISSIONS

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
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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

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

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 by 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 exits 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:

- 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.
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

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

These comments are being provided by me on my own behalf and on behalf of Sharon Corbett. We are long time residents of the Bearspaw 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. Irt 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 elsie 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 tp "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

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

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

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

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

adopted Area Structure Plans. This provides ratepayer input in development and density guidelines. Hamlets are a place densification should occur and RVC reserve land in the same quarter section should be placed into environmental reserve in proportion to the density target. We should follow the German model of 50m2 of bona fide greenspace per person.
Rocky View County needs to identify wildlife migration and limit development in those areas. Monies need to be allocated for wildlife population inventory to track changes and movement monitoring to map out migration corridors connecting critical habitat within the county. Threatened animal and bird locations should be protected according to Federal guidelines. The Defend Alberta Parks movement has shown politicians this is important to voters and ratepayers.
Infrastructure costs: The current RVC debt resulted from poor infrastructure cost arrangements with developers. A Fiscal Impact Analysis should be required for any development exceeding $5MM dollars total costs. And this FIA should form the basis for legal agreement between the county and developer regarding infrastructure costs and require a bond before the permit is allowed.
Paragraph 3.1.1.i should be removed.
Only recreational development should be permitted on river- or creek- connected alluvial aquifers. Go-forward set backs should be 500m from flowing water and 100m from the aquifer edge (determined by drilling) along permanent water courses and 100m from channel center and 50m from aquifer edge for intermittent water courses. These numbers are from studies of enteric virus survival in aquifers (Blaschke et al. 2016) Ephemeral setbacks should be 30m.
3.9.2 RVC should require Emergency Response Plans that include flooding, wildfire, and airborne (H2S) toxins. for all hamlets and population centers with more than 100 people. 2 Access and egress routes should be required for each population center. These routes should be paid for by developers as part of hard infrastructure.
RVC needs to create a monitoring plan for mosquito-born viruses including West Nile Virus, California soroviruses, Eastern Equine viruses, St Louis Encephalitus and regularly test enough water bodies to statistically cover the County.
In general the . The “should”s need to be made “shall”s with science-based quantities defining regulations, set backs and costs, both in terms of environmental services and financial costs. Monitoring schemes need to be specified and funded. Public input into development plans and Area Structure Plans needs to be formalized and required beyond the ad hoc public input currently extant. A better vetting process including the considerable expertise within the residents of Rocky View should be installed. Please try again…this is important.

Dave Klepacki
[redacted]
Bragg Creek, Alberta
Canada, T0L-0K0
[redacted]

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:

- 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).

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, Samanntha Wright; Division 9, Crystal Kissel; transportation.minister@gov.ab.ca
Subject: [EXTERNAL] - Re: objection to Springbank ASP's and MDP

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 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

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
Phone: 403-520- 1290 |
MMitton@rockyview.ca | www.rockyview.ca

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

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

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, Samanntha Wright ; Division 9, Crystal Kissel ; transportation.minister@gov.ab.ca
Subject: [EXTERNAL] - Re: objection to Springbank ASP's and MDP

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 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
Phone: 403-520- 1290 |
MMitton@rockyview.ca | www.rockyview.ca

From: Beaven, Denise [redacted]
Sent: January 23, 2021 12:31 PM
To: Legislative Services Shared <LegislativeServices@rockyview.ca>
Subject: [EXTERNAL] - Bylaw C-8090-2020

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".
  - 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.

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

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

Eric Lloyd
[redacted] Bragg Creek AB T0L0K0, [redacted]
[redacted]

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

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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MMitton@rockyview.ca | www.rockyview.ca

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

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
[redacted]

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

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
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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

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

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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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)

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 Bearspaw. 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
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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

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

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

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

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

From: Pam Janzen [redacted]
Sent: January 31, 2021 4:02 PM
To: Legislative Services Shared <LegislativeServices@rockyview.ca>
Subject: [EXTERNAL] - Comments Re MDP

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

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 f ails 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.

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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.

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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:

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- 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
[redacted]
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

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

-----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

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

-----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

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

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

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

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)

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

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

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
Flag Status: Completed

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

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

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