February 11, 2021

Stoney Consultation Office
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Dominic Kazmierczak
Manager| Planning Policy
262075 Rocky View Point
Rocky View County, AB T4A 0X2
Phone: 403.230.1401

Via email: dkazmierczak@rockyview.ca

Re: Letter of Acknowledgment - Consultation with Stoney Nakoda First Nations (SNFN) – Rockyview County Municipal Development Plan - SCT 061-1097 (2021).

Dear Dominic,

Thank you for your recent correspondence providing information about the above cited project.

Attached is a copy of the Stoney Information Letter (SIL) for you to review, and an SIL Form for you to complete for this project. The SIL contains important information about the Stoney Consultation Process, and is an important first step. The SIL Form is also designed to provide project information to the Stoney Consultation Team in a clear and consistent manner. Note that not all questions on the SIL will be applicable to your project.

We have conducted an initial review of your proposed project and note that it does impact Stoney Treaty Rights and Traditional Uses in the proposed project area. As signatories to Treaty Number 7 in 1877, the Stoney Nakoda First Nations have aboriginal and treaty rights entitlement throughout the 50,000 square miles encompassing Treaty 7 territory, and beyond. The SNFN have historic trails, campsites, hunting areas, fishing waters, ceremonial & spiritual sites, trade routes, grave sites, and gathering areas throughout our historical territory. As such we do have site specific concerns, but cannot share the information without an agreement due to intellectual property and protocol concerns. We will require more time to evaluate your project, at which time will be placed in the queue and provided the project number: SCT 061-1097 (2021).

Thank you for your interest in working with the Stoney Nakoda Nations.

Sincerely,

William Snow
Stoney Consultation Manager

C.C: Dean Cherkas, Stoney Consultation Director
Cathy Arcega, Stoney Consultation Office, Project Analyst & Coordinator
Chris Goodstoney, Wesley Consultation Officer
Conal Labelle Chiniki Consultation Officer
Larry Daniels Jr, Bearspaw Consultation Officer

CITY of AIRDRIE
COMMUNITY & OPPORTUNITY

February 11, 2021

RE: Request for Comment on Draft Municipal Development Plan

Dear Dominic and Amy,

Thank you for the Intermunicipal Committee meeting (IMC) of February 4 to discuss the draft Municipal Development Plan (MDP) circulated by Rocky View County.

As stated before and during the IMC meeting, we respect the right and opportunity for Rocky View County to direct growth to strategic locations within its boundaries. We support the desire to encourage development to the region as a whole – and to specific, strategic locations within the County in particular through its Municipal Development Plan. To this end, the City of Airdrie has consistently supported the concepts of regional planning, regional servicing, and other means to achieve efficiencies, equities and successes as a region. We see substantial opportunities for our municipalities to achieve such objectives through intermunicipal collaboration.

Per the discussion at the IMC meeting, we appreciate the recognition from the County of the need to come together as municipalities to address such opportunities for shared service optimization as well as the potential the impacts and inequities associated with growth in the north end of the Calgary Region. The development proposed by the County in the MDP for East Balzac and West Balzac brings these potential impacts and opportunities into specific relief. As such, we appreciate the suggestions from the County at the IMC meeting to move forward with the following progressive steps to address the impacts and inequities associated with the proposed development:

a) Policy language in the MDP to recognize the potential impacts and opportunities associated with growth in this corridor and work collaboratively to resolve them;

b) A Memorandum of Understanding (MOU) for the development of an Intermunicipal Collaborative Framework (ICF);

c) A signed ICF detailing the municipal service categories for potential sharing and optimization;

d) Signed cost-sharing agreements for the servicing identified in the ICF; and,

e) A Joint Council meeting schedule and approach to review impacts and opportunities in common growth corridors, as well as to retain and amend the particulars of the ICF, where required.

The City of Airdrie looks forward to supporting the proposed County Plan at a regional level with the formalization of all of these mechanisms, but not before. We appreciate the efforts put forward by the County to capture some of the essence of the discussion at the IMC meeting through proposed motions that would add the following policies to the proposed County Plan:

> New Policy [4.1.2 (f)]
> Prior to approval of local plan and land use applications adjacent to another municipality, the County should consider the use of appropriate mechanisms, such as joint studies and infrastructure cost sharing agreements, to address cross boundary impacts identified by the County.

New policy [4.1.2 (h)]:
In preparing area structure plans and/or local plans, the County shall consider Intermunicipal Development Plans, Accords and any other statutory plans, which provide direction with respect to intermunicipal gateways, transition and interface; the County should address issues and opportunities through collaboration with the adjacent municipality.

Unfortunately, these do not address all of the efficiency, equity and success objectives described in our earlier correspondence and our statement at the IMC meeting. In the interest of the County's objectives in this proposed MDP, the City of Airdrie will prepare draft language for consideration in the MDP on or before February 16, 2021. However, preparation of that language alone should not be construed as support for the plan in its current form in the absence of the progressive steps noted above.

We look forward to supporting the proposed County Plan on completing the work and collaboration for the steps identified during the IMC meeting and confirmed in this letter.

Sincerely,

Paul Schulz
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Stephen Utz, RPP, MCIP
Community Growth Manager
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Leona Esau
Intergovernmental Liaison
403.948.8800, ext. 8769
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CC: Mark Locking, Director of Community Growth and Protective Services
Jamal Ramjohn, Team Leader of Planning & Development

January 25, 2021

RE: Request for Comment on Draft Municipal Development Plan

Dear Dominic,

Thank you for the opportunity to comment on the draft Municipal Development Plan (MDP) circulated by Rocky View County as follow up on our letter of November 20, 2020.

We respect the right and opportunity for Rocky View County to direct growth to strategic locations within its boundaries. We do not object to the desire to encourage development to the region as a whole, and to specific, strategic locations within the County in particular through its Municipal Development Plan.

To this end, the City of Airdrie has consistently supported the concepts of regional planning, regional servicing, and other means to achieve efficiencies, equities and successes as a region. We see substantial opportunities for our municipalities to achieve such objectives through intermunicipal collaboration.

Our previous comments on *Section 3.1.1 – Financial Sustainability Policies* spoke directly to that opportunity. As stated on November 20, the proposed development expansion shown in the Land Use Concept for West Balzac and East Balzac is an area subject to further discussion and intermunicipal collaboration. These lands adjacent to our southern border are of critical importance to both of our municipalities and the north end of the Calgary Metropolitan Region as well. It has always been our intent to work with Rocky View as part of a Joint Planning Area (JPA) or under the terms of an Intermunicipal Collaborative Framework (ICF) for these critical updates. Such a mechanism would ensure that all opportunities for shared services and cost optimizations have been explored, and that we are proactively addressing all potential impacts on both municipalities.

We advise that we could support the proposed Municipal Development Plan contemplated by the County with the formalization of one of these mechanisms. This would likely take the form of an adopted Context Plan and associated agreements in the case of a JPA, or through a Memorandum of Understanding of mutually acceptable terms in the case of an ICF.

It is my understanding that our collective Administrations are working together to schedule an Intermunicipal Committee (IMC) meeting to have purposeful dialogue on such mechanisms. We look forward to the discussion on achieving the mutually beneficial opportunities and mitigating the potential impacts from this scale of growth in the north end of the region.

Beyond this, we note the following with respect to some of our other comments from November 20:

- We appreciate that the County has agreed to a language change in Section 3.4.3 – Confined Feeding Operations to mandate that a confined feeding operation not be located within the notification zone with any adjacent municipality.

- However, in keeping with our earlier comments and the position of this letter, we support language that directs growth to specific, strategic locations. While we appreciate the desire for flexibility, the intent of planning is to direct growth to efficient and appropriate locations. We request that the language we cited on November 20 regarding your Principles, Employment Areas and Hamlet Growth Areas align with that intent. Further, we note that the purpose of the Regional Growth Plan is to direct growth to strategic locations and that this MDP has not referenced this direction in a substantive manner.

We look forward to the opportunity for discussion on this matter at an IMC meeting at the earliest possible convenience.

Sincerely,



Stephen Utz, RPP, MCIP
Community Growth Manager, City of Airdrie
403.948.8800, ext. 8471
stephen.utz@airdrie.ca

CC: Paul Schulz, City Manager
Mark Locking, Director of Community Growth and Protective Services
Jamal Ramjohn, Team Leader of Planning & Development
Leona Esau, Intergovernmental Liaison

November 20, 2020

Re: Response to Intermunicipal Circulation of draft MDP

Dear Dominic:

The City of Airdrie Planning & Development Department has completed its review of Rocky View County's Municipal Development Plan (MDP). Thank you for the opportunity to provide input in your engagement process.

The following list comprises areas of the draft MDP for which we have suggested amendments:

Section 1.3: understanding that flexibility is desired here, it would be preferable to write, "Rocky View County *shall* concentrate growth within designated development areas…."

Section 2.4.1: the proposed wording (subsection 'a') here notes employment areas in Figure 2 should have an adopted area structure plan in place prior to development. Replacing the word "should" with "shall" would be preferred. Similarly, in subsection 'c', "expansion of Employment Area boundaries should require an area structure plan or an area structure plan amendment", it is preferred that "should" be replaced with "shall".

Section 2.5.1: growth in Hamlets (subsection 'a') notes, "Development in Hamlet Growth Areas should be guided by, and conform to, the adopted area structure plan, area redevelopment plan, or conceptual scheme." Replacing 'should' with 'shall' here is preferred.

Maps 2 & 3 and Section 3.1.1: the Assessment split proposed in this section and extent of proposed future employment areas adjacent (south and southeast) to Airdrie, are subjects for further discussion and Intermunicipal collaboration.

Section 3.4.3: in subsection 'b', the draft MDP notes, "A confined feeding operation, including its minimum distance of separation, should not be located within the boundary or notification zone of any Intermunicipal development plan, statutory planning area, hamlet, residential area, institutional use, or federal, provincial, or municipal park or recreation area." Replacing 'should' with 'shall' here is preferred.

If you have any questions or comments, please do not hesitate to contact me.

Kind regards,

Jamal Ramjohn RPP, MCIP
Team Leader, Planning & Development
jamal.ramjohn@airdrie.ca
403.948.8800 (ext. 8242)

,

February 3, 2021

Rocky View County Offices
262075 Rocky View Point
Rocky View County, AB, T4A 0X2

To: Ms. Theresa Cochran
Executive Director, Community Development Services, Rocky View County

Mr. Dominic Kazmierczak
Manager, Planning Policy, Rocky View County

Re: **Rocky View County's New Municipal Development Plan Project**
The City of Calgary's submission to Rocky View County's Public Hearing

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Dear Ms. Cochrane and Mr. Kazmierczak:

This letter is intended to provide The City of Calgary's Administration position on Rocky View County's proposed Municipal Development Plan.

As detailed in The City of Calgary's letters of November 20, 2020 and January 20, 2020, The City of Calgary has the following five concerns with the proposed Municipal Development Plan:

1. **Addressing impacts on Calgary infrastructure and services**

   The Calgary Metropolitan Region Board's Interim Growth Plan (Policy 3.2.3) states that "*All statutory plans shall: provide mitigation measures and policies to address identified adverse impacts on existing or planned regional infrastructure, regionally significant corridors, and community services and facilities*." The County's revision to the draft MDP has not sufficiently addressed potential detrimental impacts on Calgary's regionally significant infrastructure, corridors and services. **Additional policies are required to ensure that growth in Rocky View County has no adverse impacts on regional infrastructure, services and facilities within The City of Calgary.**

2. **Identifying Priority Growth Areas**

   The proposed Municipal Development Plan does not identify priority growth areas or provide growth management policies for Rocky View County. As a result, The City of

Calgary is concerned that the absence of policy will result in an overall dispersed pattern of growth to occur that is not aligned with the purpose, principles and policies of the Interim Growth Plan to promote the efficient use of land. **Additional policies are required to ensure that the Municipal Development Plan supports the efficient use of land and services.**

3. **Source Water Protection**

   The City continues to have significant concerns about several issues regarding source water protection. Further concerns are detailed in our letter dated January 20, 2021. In our view, the proposed Municipal Development Plan is not in alignment with the principles of the Interim Growth Plan, Intermunicipal Development Plan, the Bearspaw Reservoir Tri-Lateral Consensus report and the Glenbow Ranch mediated settlement agreement as there could be significant impact on The City and region's source water quality. **Additional policy is required to support the sustainability of our region's long-term drinking water supply.**

4. **Calgary's IDP Growth Areas need protection**

   The proposed Municipal Development Plan identifies Rocky View County growth areas within long-standing identified City of Calgary Growth Areas (as identified in our jointly adopted Intermunicipal Development Plan). More specifically, the Municipal Development Plan would be in conflict with the Intermunicipal Development Plan as well as our long-standing agreements with respect to growth of both municipalities. **The Municipal Development Plan should be amended to remove Rocky View County growth areas from identified City of Calgary growth areas unless the Intermunicipal Development Plan is jointly amended.**

5. **Ensuring sufficient collaboration undertaken by the County to resolve cross-boundary issues**

   The proposed Municipal Development Plan project has not meaningfully engaged The City of Calgary in the development of the Municipal Development Plan.

Given the outstanding concerns identified in this and previous letters (attached), The City of Calgary does not support the approval of the proposed Rocky View County Municipal Development Plan. We would ask that our municipalities work together to resolves these issues in a meaningful way. **Therefore, The City of Calgary would request that Rocky View County not give second reading to the Plan but rather direct Administration to work with The City of Calgary' Administration to resolve the above identified concerns.** The delay would enable our Administrations to continue to work together to resolve these outstanding issues in a meaningful, mutually beneficial manner.

Should Rocky View County Council give Second Reading to the Proposed Municipal Development Plan, The City of Calgary would request that (in alignment with our jointly

adopted Intermunicipal Development Plan) Rocky View County agree to enter into mediation to resolve the identified concerns.

Thank you,



Christine Arthurs, BA MEDes (Planning) RPP, MCIP
Acting General Manager
Deputy City Manager's Office
The City of Calgary

Attachments (2)

cc: Stuart Dalgleish, General Manager, Planning & Development, The City of Calgary
Kelly Cote, Manager, Intergovernmental and Corporate Strategy, The City of Calgary

January 20, 2020 **City File: RV20-15**

Attention: Dominic Kazmierczak

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

SUBJECT: Rocky View County's Draft Municipal Development Plan (circulated December 18, 2020)

Dear Mr. Kazmierczak,

Thank you for your letter dated December 18, 2020 containing the County's response to our previous comments on The County's draft Municipal Development Plan (MDP). The City of Calgary (The City) Administration has reviewed the recirculated draft MPD in consideration of Rocky View County/City of Calgary Intermunicipal Development Plan ("IDP") and the Calgary Metropolitan Region Board Interim Growth Plan ("IGP").

As drafted, the MDP could enable potential detrimental impacts on Calgary infrastructure, regionally significant corridors, services, and source water. The draft MDP also proposes fragmenting Calgary's IDP Growth Areas and focusing development on our boundaries where to two municipalities have not yet coordinated our planning. These issues and others have been identified in the previous circulation response letter, dated November 20, 2020, and have not been addressed sufficiently to mitigate potential adverse impacts. As this time, The City of Calgary is unable to support the Municipal Development Plan.

The City of Calgary requests that the MDP not be considered for approval until such time that the impacts to Calgary infrastructure and services associated with the draft plan are addressed and policy controls are in place to resolve cross-boundary impacts. Given the number of concerns, The City requests that further collaborative administrative meetings occur prior to second reading, and that The County and City utilize the provisions outlined within IDP section 15.3 *Resolution of Intermunicipal Matters*.

The City offers the following general comments for your consideration.

1. **Addressing impacts on Calgary infrastructure and services**
   The IGP states in policy 3.2.3 that "*All statutory plans shall: provide mitigation measures and policies to address identified adverse impacts on existing or planned regional infrastructure, regionally significant corridors, and community services and facilities*." The County's revision to the draft MDP has not sufficiently addressed potential detrimental impacts on Calgary's regionally significant infrastructure, corridors and services.

   We understand that ASPs and other planning tools can be utilized to further understand impacts to infrastructure; however, the draft MDP needs to include policies in that specifically call for ASPs to explore cost-sharing for services and to identify all off-site infrastructure upgrades. Currently, the MDP supports potential cost-sharing agreements only for libraries in section 3.10.1.g). The City would be supportive of proportionate cost-sharing, and strongly recommends the draft MDP strengthen high-level policies to support subsequent work in ASPs.

2. **Identified Priority Growth Areas**
   The City would appreciate further clarity on The County's approach to setting overall growth locations and on how the County intends that the priority growth will be sequenced. There are very few policies tying growth to servicing, or understanding that the cumulative impacts of this growth could have detrimental impacts to The City of Calgary. Without prioritization or growth management policies, the draft MDP could enable an overall dispersed pattern of growth to occur that is not aligned with the purpose, principles and policies of the IGP to promote the *efficient use of land.* Where does the County anticipate development will occur next?

   At this time, the County's response does not sufficiently address the impacts to the region. We request further details on the amount of growth that could be achieved through the total of all land uses in the draft MDP.

3. **Source Water Protection**
   Thank you for being amenable to further discussions. The City continues to have significant concerns about several issues regarding source water protection:

   1) Development approach of the County and the general vagueness of "*adaptable growth areas*" which appears to go against the intent of sustainable regional planning.
   2) Continued disconnect between piped servicing, development and reliance on individual lot solutions to address water, wastewater and storm servicing.
   3) The lack of policy on source water protection
   4) It is in The City's opinion that without baseline surface water quality data / conditions RVC cannot address the cumulative impacts the proposed (and existing) development will have on source water.

In our view, the draft MDP is not in alignment with the principles of the Interim Growth Plan as there could be large impacts on regional infrastructure, source water quality, and promotes inefficient use of land.

4. **Calgary's IDP Growth Areas need protecting**
The draft MDP would enable premature development and fragmentation of Calgary's IDP Growth Areas, which is a significant barrier to Calgary's approach to creating comprehensively planned urban communities that can be sufficiently serviced after annexation. It is very difficult to integrate new urban development on previously-developed annexed lands. This is not a sustainable approach to regional planning.

   The draft MDP would consume half of Calgary's Industrial Growth Area and perforate two portions of our Residential Growth Area. Having development predetermine what is in place for us can make the lands less viable for future annexation to Calgary and could affect our 2006 Annexation Agreement. Maintaining the integrity of future annexation lands is important to The City; we have not supported past applications in Calgary's IDP Growth Areas because they impact the ability to accommodate future urban development.

   While not in direct conflict with the IDP polices on Growth Areas, the draft MDP is inconsistent with the spirit and intent of the IDP because it does not align with the objectives to *recognize growth corridors for both municipalities*. At present, our municipalities have not agreed on an appropriate use of these lands.

5. **Ensuring sufficient collaboration undertaken by the County to resolve cross-boundary issues**
IGP policy 3.2.3 states that "*Municipalities should collaborate to coordinate planning for land-use, infrastructure, and service provision with other members, where appropriate*." The County's revision to the draft MDP has not yet provided us with a sufficient opportunity to collaborate to coordinate our planning as potential cross-boundary impacts. We recognize the County is arranging a follow up meeting to address our responses, and we look forward to collaborating further.

   In responding to The City's concerns regarding insufficient collaboration, County Administration compares The County's process as similar to others in the region. For a plan proposing significant shifts in direction, The City would have welcomed a *structured engagement process* to support collaboration. The County's past engagement on the previous County Plan provided this and it is a good example of the level of engagement that would have been needed to address concerns of this magnitude. Instead, The City first learned of the County's proposed direction through a circulation of the draft plan because no meeting was held at the plan development stage for The City's input at a critical milestone.

Thank you for the opportunity to review and comment on this draft plan. Detailed technical comments are provided in the attachment. The City maintains that development within the County's draft MDP

should not have a negative financial, social and environmental impact on Calgary. We have many more constructive comments that we would like to share with your staff. We look forward to our meeting on this very important plan. We remain committed to achieving a mutually beneficial solution and request that the draft MDP not be given second reading so that County can resolve the significant issues arising from the draft plan.

If you have any questions or concerns, please contact myself or Neil Younger, Senior Strategist, Intergovernmental & Corporate Strategy at: neil.younger@calgary.ca or 403.828.1647.

Sincerely,

Natalia Zoldak
Planner 2, Intergovernmental & Corporate Strategy
Deputy City Manager's Office | The City of Calgary
C: 403.828.4516 | **E**: Natalia.Zoldak@calgary.ca

cc: Neil Younger, Senior Strategist, The City of Calgary
Kelly Cote, ICS Manager, The City of Calgary
Matthew Atkinson, The City of Calgary

Attachment: Detailed Technical Comments

Detailed Technical Comments

1. Planning and Development Comments, Intermunicipal Comments

There are several areas in the document that continue to present issues for our intermunicipal coordination. The City would like to see these addressed.

a) Figure 1: **Planning Framework Alignment** – while IDPs are subject to the CMRB Growth Plan Framework, the diagram shows it outside.

b) Calgary Growth Areas. Figure 2: **Growth Concept Map** identifies Priority Growth Areas on lands identified in the IDP as Calgary Growth Areas. This is inconsistent with the IDP. *This issue has not been addressed, rather, the MDP continues to not be in alignment with previously approved higher order policy. The City requests further meetings to discuss this matter. Additional details are in the letter.*

c) Figure 2: Growth Concept Map Identifying Priority Areas for Growth proposes a significant amount of residential and employment lands without prioritizing those lands or providing an understanding of the amount of growth contained within those areas. The plan states a 20-year time horizon, The City is requesting the geodemographic information that informed this map and how it is tied to population projections. *Without this information, it is difficult to understand how the region is intending to grow. Also, the amount of growth proposed is an important factor for ASPs to consider as full servicing is often tied to larger build out. This information should be provided and considered at the ASP stages of planning. This would allow the ASPs to understand timing for build out and impacts to offsite services*

d) The City requests data be provided on amount of **population and jobs** that can be accommodated in the Growth Concept. *To be able to plan the region effectively and prioritize growth areas, data needs to be provided to outline the number of jobs and population that could be accommodated within the plan area. The expansion of residential and employment uses should be tied to growth projections.*

e) The City recommends that growth areas be prioritized and growth management through policy or mapping to ensure appropriate levels of servicing can be provided. *The County states that ASPs will assess technical feasibility and servicing availability. However, further policies need to be drafted to ensure that ASPs consider the cumulative effects of development to offsite services and infrastructure and that cost sharing for these impacts are mitigated.*

f) The City recommends that additional plans and studies should inform the MDP, most significantly additional transportation studies and the Bearspaw Task Force Trilateral Consensus Report. *These studies should be added to the list outlined in the MDP.*

g) Section 2.3.1.h.i Establish density ranges and dwelling unit numbers that determine population on the basis of developable land*. The City recommends adding servicing and infrastructure considerations to this policy.*

h) The draft MDP is silent on a number of areas including equity, Indigenous relations, future of mobility, and livability. The City recommends Rocky View County consider addressing these policy areas within the MDP. *Comment was not responded to at all.*

i) **Planned and Future growth areas map.** Figure 3 identifies unplanned lands beyond North Springbank ASP as "*Planned Areas"*. In addition, plans under review are also identified as "*Planned Areas*" (Springbank, Janet, etc) but without specific guidance on how existing plans will proceed. Will it permit large future intensification? How are plans in process guided? *Comment was not responded to at all.*

j) *The County outlines that ASPs will assess infrastructure and servicing impacts to Calgary. However, there is no policy contained within the plan indicating this. The City requests that policies stating the future ASPs will examine, in collaboration with other impacted municipalities, the cumulative effects of the proposed development on offsite infrastructure and services. ASPs should outline cost sharing policies for these services and infrastructure. Planning proposals will need to consider how adverse impacts may be resolved, or what steps will be taken at the ASP stage.*

k) The City remains concerned about the remainder of the OMNI lands being shown and ask that the County consider the mediated settlement in its planning efforts. The City is also concerned about growth surrounding Omni as this could increase the level of impacts as those raised in the settlement. The City is unable to support boundary development until sufficient provisions are in place to address our concerns.

l) Thank you for adding text regarding air quality and GHG emissions to the draft MDP in Section 3.5 (Environment).

2. TRANSPORTATION COMMENTS

The impacts on transportation infrastructure are not sufficiently addressed. The draft MDP needs further policy guidance for ASPs:

- As previously communicated, the full build out of these plan areas will mean there is a significant need for new or expanded major infrastructure. A significant amount of development is proposed to be located along Calgary's boundary where they are expected to impact Calgary's transportation system. The City is concerned with the resulting traffic impacts. Appropriate provisions are needed to support highway networks, and identify and mitigate downstream impacts. The Interim Growth Plan policy 3.5.1.1 c) outlines that impacts to regionally significant infrastructure must be identified and mitigated through the plans; this has not occurred to date.

- The draft MPD focuses development on our boundary and will increase the demand on City of Calgary's transit infrastructure, while not contributing to its maintenance or construction. Cumulative impacts of this development needs to be understood. The City would like to see the draft MDP address the cumulative impacts of the proposed growth on City infrastructure and services.

3. CALGARY TRANSIT

There is a need for greater mention on the future provision of transit, and clarity regarding the addition of transit policies. The proposed growth in Rocky View at the City boundary may result in increasing pressuring Calgary services such as transit.

General Comments:

1. The response package indicates RVC "added policies related to future provision of transit service." In reviewing the redline document, it is unclear where these new policies are. Please clarify.
2. CT strongly recommends including a short transit section to set high-level policies for future transit provision, especially given the extent of growth proposed in the MDP. While local plans can include area-specific details, late stage transit planning at the local plan level is difficult and results in costly retrofitting, inefficient operations, and missed opportunities, especially near intermunicipal boundaries.
    - The content of a transit section in the MDP should include priority areas for transit corridors, transit hubs, and direction for local area planning (i.e. local plans with a regional transit component should provide direct paths of travel for the transit service, and avoid having transit connections on a major deviation or discontinuous road networks).
3. The growth pattern proposed is unclear in terms of priority and identifies multiple areas near the Calgary City boundary for future growth. Non-contiguous growth patterns do not support

transit service. Clarity needed on sequencing of priority growth areas and the impacts of growth on transportation systems to holistically evaluate the impact to the City of Calgary growth and servicing.

4. WATER RESOURCES

Comments previously provided by Water Resources on November 20, 2020 have generally gone unaddressed and appear to be completely unacknowledged in the response from Rocky View County. The initial comments provided by Water are appended to this section.

Water Resources provides the following specific comments on the letter received from RVC (Dominic Kazmierczak) dated November 20, 2020:

Pg. 2: *Identified Priority Growth Areas:* General comment . . . *The City would appear to be reluctant to support such a shift to a more sustainable development form that would result in benefits for both municipalities and achieve regional goals*.

- The City would suggest this is a misleading statement; there appears to be very little in the MDP that indicates how RVC will achieve sustainable development in the absence of a strong policy framework to inform lower order plans. The MDP should provide a policy structure that is coordinated through realistic and serviceable growth areas that outline how water resources and the environment are protected.

Pg. 2: *Identified Priority Growth Areas:* The City would suggest that there isn't a difference in rural and urban planning and the problem has been the 'flexibility' that RVC has in the MDP which does not lead to sustainable planning, particularly under a new regional plan. The City would suggest that *adaptable growth areas* go against the spirit of sound and sustainable regional planning.

Pg. 2: *Identified Priority Growth Areas: The County considers that the most appropriate place for detailed and accurate planning of population growth and the services required to support that population is at the ASP and future local plan level*.

- The City would suggest that this approach does not lead to identified growth areas or contiguous development pattern. This statement is problematic as it does not allow for the organized and coordinated extension of services while going against the spirit of sound sustainable regional planning.

Pg. 3: *Source Water Protection*: MDP should reference the Bearspaw Tri-Lateral Consensus report and Glenbow Ranch mediated settlement in which the County must accept responsibility and mitigate any harm or detriment to the drinking water supply for 1.2 million people and not defer responsibility to AEP or developers. As the planning authority, RVC has an environmental stewardship responsibility they cannot download.

- The paragraph also refers strategies that rely on provincially approved servicing systems. In the absence of source water protection policy, The City would request RVC supply a map showing all septic systems and drain fields upstream of Calgary within the source water. The City would also

request clarity on RVC's tracking system, emergency response plan, or strategy to address system failures over time. It is suggested this would be a worthwhile exercise for RVC to consider (if not already done) outside of the MDP process.

In several comments, RVC suggests that they agree of the importance of Source Water protection. This commitment is not reflective in the MDP vision or policy statement. The City would suggest that in the absence of a commitment to continuous piped servicing system expansion the policies around source water need to be strengthened to ensure the continued protection of the source watershed. The addition of these policies should be supported by science to clearly articulate how development is not negatively impacting source water.

Updated MDP draft:

General:

RVC states in their response that they have made amendments to the MDP to include specific source water protection policies. Upon review additional policy statements have not been added except for an acknowledgement of source water protection in the *ecological feature description*.

- The City is requesting that specific 'shall' policy statements be added to the MDP to illustrate RVC's commitment to source water protection.

RVC uses the term *environmental features* and *ecologically sensitive areas* in the MDP, language which remains vague and lacks details on what they would consider *potentially important*. Response indicates that this was kept intentionally high level since studies would occur at the ASP or other planning stage. The City does not support this approach and would suggest the intent of the MDP is to set the direction for lower order planning documents achieved through the support of strong policy statements.

- The vagueness of the draft MDP is a concern. The City would suggest that it does not provide enough direction to inform lower order plans or result in an organized and contiguous growth pattern.
- 1.6.6: *Additional Plans and Studies informing the MDP* – The City would suggest the addition of a water / environmental protection plan be developed to help inform the MDP.
- 3.1.1a: *Financial Sustainability Policies - New development ~~should~~ shall be directed to areas with existing infrastructure, ~~where feasible~~.*
- 3.5.5 – *Development in hazard areas*: It is unclear why RVC would entertain development in hazard areas?
- *Conceptual Scheme Requirements*: The City would request the addition of a requirement to conduct a cumulative effects assessment for development located within the source watershed – to ensure no decrease in water quality resulting from the proposed. City would suggest this as good practice at ASP level as well.

Appendix 1: Initial Comments Provided by Water Resources – unaddressed in RVC response letter

Section 1.6 Planning Framework

- There appears to be a major gap in aligning the policies of Area Structure Plans (and subsequent Conceptual Schemes and Master Site Development Plans) to the Land Use Bylaw (and subsequent Redesignations, Subdivisions and Development Permits). Based on Water Resources review of various land use and development applications, The City strongly recommends that this gap is addressed within Rocky View County's planning system in order to ensure orderly sustainable growth that aligns to its MDP. This planning framework gap should also be addressed in Section 1.6.5 – Implementation of Plans

Section 2.1 Population and Housing Trends

2.3 Residential Growth

- (f): Primary Residential Areas should include some discussion on the types and levels of service that are required and if they will be provided by the County, private utility or via intermunicipal agreement.
- (h): stormwater management plans should be required in Hamlet developments because of potential downstream impacts to neighbouring municipalities;
- Section 2.3.3: comment: fragmented county development is a concern for The City of Calgary

2.5: Hamlet Development

- Strongly that this section includes a discussion of the types and levels of services that are appropriate for this type of development pattern;
- A master site development plan should be required prior to development approvals in any hamlet, that includes servicing and an environment impact assessment
- Recommend that servicing agreements must be in place prior to development and land use approvals

Section 3.1: Financial Sustainability

- Recommend a discussion of types of services provided and where intermunicipal services are required for different development types

3.1.1: Financial Sustainability Policies

- Suggest adding the following language **in bold**:
    - "Prior to approving a development proposal, the County should ensure that **infrastructure servicing is in place and** that full cost recovery…."

3.3: Natural Resource Development

3.3.1:Aggregate Development

- suggest adding language requiring an environmental impact assessment as aggregate development has the potential to impact water resources in adjacent municipalities

3.5: Environment

- It is somewhat unclear what is fully captured in "environmental feature" beyond the examples that are provided. The draft MDP also indicated that environmental features are "potentially important" but does not indicate why these features are important in order to provide direction to assess for protection or impact mitigation. We suggest adding in additional details and explanation of these terms.
- Recommended that RVC incorporate Environmentally Sensitive Areas criteria and definition into the MDP in alignment with current direction of the CMRB. The stewardship of ESAs is essential to the long-term maintenance of ecosystem function and services within the region. If available, ESAs should be delineated on a map.

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- There is a significant policy gap in this section regarding the protection of surface water quality and quantity and the need to protect drinking water sources for adjacent municipalities.
- Where does the MDP commit that the growth approved in the Growth Concept Areas will meet the necessary requirements to not degrade the watershed and, specifically, the water that flows to downstream users? This of keen interest to The City given the extensive growth identified in the Bow and Elbow source watersheds. The language on page 15 "Future development should avoid or mitigate impacts to these areas" would benefit from additional action items or stronger language to help communicate the importance of this. .
- A large future planning area is identified along Highway 8, in the Elbow source watershed. The text on page 15 indicates "these areas... will require ASPs or conceptual schemes to demonstrate how future growth is accommodated in a sustainable manner." It is unclear what is meant by this statement.
- Population and economic growth within the region require a secure and safe water supply. Protection of watershed health and source water quality needs to be considered in concert with other planning outcomes. The Environmental Policy Area identifies a specific objective that "drinking water sources are protected" but does not include specific policies related to source water protection. Possible additions could include preserving lands critical to watershed protection and source water quality, safeguarding source water catchments, and incorporating source watershed overlays in land use planning decisions through intermunicipal coordination and the CMRB
- The Growth areas outlined in Figure 2 show a strong concentration of primary residential development taking place in the Bow and Elbow Watershed that raises concerns around the cumulative impacts of development in the Source Watershed. This section should include policy statements around how impacts on source water will be mitigated.

Section 3.6 Utility Services

- Located on page 5 of the Draft MDP "….the provision of services to these areas can become a long-term burden on the County's finances." How will this be managed for water, wastewater and stormwater services? Page 10 lists all the 'additional Plans' but the list does not include A Master Plan for Water, Wastewater and Stormwater. This Plan would be valuable to the City to

further understand the County's approach to deliver efficient and sustainable servicing without detriment/degradation to the watershed.

- With the projected growth outlined in section 2.1, a long term serving plan would be important as the shift from country residential to mix residential development has different levels of service required. As septic fields and well water are not a sustainable servicing plan long term alternatives should be discussed.
- Located on page 48 Action 3.7 "Identify core County services". Additional details on what this could potentially include would be helpful.

3.6.3 Wastewater management

- Please define *carrying capacity* for wastewater treatment systems and how that information will be shared with neighbouring municipalities that could be impacted by potential water quality degradation

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- Recommend adding a policy in this section that requires stormwater management plans and regulatory approvals from the Province to be circulated to adjacent municipalities if within 1 km of a shared boundary

Section 4.1 Intergovernmental Relationships

- This section should include a policy statement that speaks to promoting and fostering continued partnerships with regional municipalities to create and maintain an ecological network and coordinate on source water protection.

General Comments:

- On page 18 of the Draft MDP indicates that new ASPs should 'address' 'utility connections'. Additional action items would be helpful to assist in long range planning for utility connections.
- Natural infrastructure (i.e. natural assets and engineered elements) provides important ecological services, and can include wetlands, trees, riparian areas and other open spaces. Integrating natural infrastructure into land use planning can help ensure conservation, support growth and maintain services such as water supply. City-wide policies could be expanded to include principles of natural infrastructure into land use and development decisions.

5. Recreation Considerations and Implications

Rocky View County's revised Municipal Development Plan (Dec 2020) does not provide additional clarification on the provision of recreation services and facilities within Rocky View County, and no recreation related policies have been added or edited in the draft. Additionally, most of Recreation's comments on the previous MDP draft remain unresolved.

The MDP proposes significant population growth (17,546 people by 2040) in areas adjacent to Calgary and provides very little direction on what recreation services or facilities will be added or expanded to support this growth. Without clear direction for the provision of recreation services within the MDP

there is concern that the lack of polices will result in uncoordinated regional recreation planning, and additional costs born by The City as more County residents visit City recreation facilities. There is a serious risk that existing and planned City recreation facilities will become overburdened by additional County residents, negatively impacting Calgarian's ability to access facilities and programming that provide critical health and wellness benefits.

The County has addressed most of our previous draft MDP comments by stating that their Recreation Master Plan will provide recreation policy direction, but no details are provided on the how the Master Plan will achieve this. Calgary Recreation has requested (through the County's Recreation Master Plan engagement process) a copy of the draft Recreation Master Plan. The Plan, however, has not been sent, and the Plan engagement materials reviewed by Recreation provide little detail or information about how the County plans to provide recreation services in growth areas. Without this additional information, it is challenging to conduct regional recreation planning, including the 2021 regional recreation study that is being undertaken by The City, County, and City of Chestermere. Receiving clarity on the County's recreation plans and policies is also important for planning Recreation capital projects.

Below is a summary of Calgary Recreation's responses to the revised draft MDP and the County's comments:

- Greater clarity is needed within the MDP on how the County's MDP, Recreation Master Plan, ASPs, and Local Plans interrelate to provide recreation planning direction, and whether the MDP's recreation policies will be updated or strengthened once the Recreation Master Plan has been approved by Council.
- As the MDP recreation policies (3.8.5 a-e) are so high-level, it is requested that the County provide information on how the Recreation Master Plan indeed addresses our previous comments, including:
    - It is assumed that under the Municipal Development Plan, Rocky View County will not be providing recreational facilities for residents. This can be anticipated to mean that residents will use facilities provided by adjacent municipalities such as Calgary, Cochrane, and Airdrie. What specific guidance does the Recreation Master Plan provide for future recreation cost sharing agreements with The City?
    - How Rocky View County plans on collaborating with The City and neighbouring municipalities for shared recreation services?
    - How the County – Calgary Regional Recreation Study and Options for Enhancing Regional Recreation document (that was prepared by the Recreation Servicing TAG and unanimously approved by the CMRB) have been incorporated into MDP and Recreation Master Plan?
    - What does the Recreation Master Plan say regarding the County's 'appropriate provision of facilities' in growth areas, and the specific prioritization and planned locations of those facilities?

November 20, 2020 **City File: RV20-15**

Attention: Dominic Kazmierczak

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

SUBJECT: Rocky View County's Draft Municipal Development Plan (circulated October 21, 2020)

Dear Mr. Kazmierczak,

Thank you for your recent circulation of the draft Rocky View County Municipal Development Plan. The City of Calgary (The City) Administration has reviewed the draft plan in consideration of Rocky View County/City of Calgary Intermunicipal Development Plan ("IDP") and the Calgary Metropolitan Region Board Interim Growth Plan ("IGP").

The proposed draft of the Rocky View County (County) Municipal Development Plan (MDP) is a significant, new vision for the County. The draft plan marks a shift from focusing development into rural hamlets, to instead capturing a broad range of development opportunities; some of which are dependent upon infrastructure in the region, and also infrastructure, services, and labour from Calgary.

At this time, The City is not able to support the draft Municipal Development Plan (MDP) as currently presented, due to absence of intermunicipal consultation and significant transportation, servicing, source water, and stormwater impacts that could cause detriment to The City of Calgary. The City of Calgary requests that the MDP not be considered for approval until there is full understanding of the impacts on City infrastructure and services associated with the full build out, and that meaningful and robust policy controls are in place to ensure proper servicing. The City requests that the draft MDP be referred to the Rocky View-Calgary Intermunicipal Committee (IMC) in December for review in accordance with IDP section 15.3 *Resolution of Intermunicipal Matters*. It is our hope to resolve the significant issues arising from the draft plan and ensure that a mutually beneficial solution can be achieved.

In addition to the initial comments and questions provided in our preliminary response letter dated May 11, 2020, The City offers the following general comments for your consideration.

Summary

The draft MDP proposes a significant amount of "Priority Growth Areas" of residential and employment areas; increasing exurban growth surrounding Calgary. However, without identifying sufficient service provision and growth management mechanisms, we are concerned that the MDP policies will create planning uncertainty by enabling and increasing boundary development over the build-out of "*Hamlet Growth Areas*" and existing settlement areas. MGA provisions call for logical and orderly development; it is unknown where development will occur next.

Without a cost-sharing framework, we are concerned that unfunded infrastructure upgrades and servicing costs associated with County development will instead be born by The City and will continue the pattern of inadvertent subsidization of services provided to RVC residents and businesses. It is inequitable for County development to utilize Calgary's tax-supported infrastructure and services and not contribute equitably to Calgary which makes those opportunities possible. Also, without sufficient source water protection, future residential growth may impact drinking water sources in the Bearspaw and Glenmore Reservoirs.

The draft MDP also proposes to plan out half of Calgary's Industrial Growth Area and a portion of our Residential Growth Area long identified in our Intermunicipal Development Plan. These are areas are intended to be considered for future annexation to Calgary.

As a general principal, development within the County Plan should not have a negative financial, social or environmental impact on Calgary. We have many specific, constructive comments that we would like to share with your staff. We hope for further opportunities to work together on this very important plan.

1. **Intermunicipal Engagement**

   On February 10, 2020, RVC met with City Administration to introduce the MDP project and the approach to the analysis. In response to many unknowns at that time, Calgary Administration's preliminary comment letter from May 11, 2020 requested "*further engagement to address our questions and concerns…*". Our ask was "*that the process provide for sufficient time to undertake deliberative dialogue, particularly at key milestones*" and that "*we would like to discuss ways to ensure that the policy framework that does not result in proposed development negatively impacting Calgary's infrastructure and services*."

   The County's introductory meeting held in February was the only meeting and occurred prior to the development of the growth concept. The City first learned of the proposed concept through the circulation of the draft plan. Calgary Administration have not been sufficiently engaged or contacted to this date. It is our request that the item be referred to the upcoming Intermunicipal Committee so that a path to mutually beneficial solution can be identified.

2. Growth Management

The RVC draft MDP provides very few tools or policies to manage growth. The plan outlines that a "*suitability analysis*" was used to identify growth priority areas. The plan states that "*The suitability analysis used spatial data to identify landscapes that may not be appropriate (e.g. wildlife corridors, wetlands, agricultural lands), and factors that would increase the suitability of an area for additional development (e.g. access to existing transportation infrastructure and servicing)*." The suitability analysis did not factor social or economic conditions that would further delineate appropriate growth priority areas.

The draft plan outlines that the growth and development for the next 20 years will be guided by the Growth Concept. There seems to be a lack of prioritization of the growth through the Growth Concept and no population forecasts associated with the concept were provided. The plan speaks to accommodating 60,000 people by 2040 but does not address whether the lands within the growth concept accommodate this or more population.

As growth management is closely related to service provision, allowing such large amounts of land to grow with very few policies tying growth to servicing or understanding the cumulative impacts of this growth could have detrimental impacts to The City of Calgary.

3. **Omni ASP and surrounding area**. The draft MDP proposes an "*Employment Area"* beyond the approved geography for Omni ASP. This is inconsistent with the MGB Board Order remedy of a reduced plan area (MGB 068/18). The draft plan lacks sufficient provisions to require upgrades to the transportation infrastructure within Calgary. We see this as a significant concern because as the order states "*there are few or no plans in place for any of these improvements, and no identified sources of funding to pay for them*." It is premature to plan the entirety of Omni ASP and the adjacent lands, located along Calgary's northeast boundary, as a priority "*Employment Area*" until an agreement can be reached to ensure servicing costs associated with County development are covered.

4. Alignment to the Intermunicipal Development Plan (IDP)

The County's draft MDP proposes "*Employment Areas*" within lands long identified as a *City of Calgary Growth Areas* under the policies of our mutually agreed to IDP. We are concerned this will prejudice Calgary's future Residential and Industrial Growth Areas. The draft Municipal Development Plan is not in alignment with the intent and objectives of the IDP. For example, Section 8.0 Growth Corridors/Areas and Annexation of the IDP outlines that an objective of the plan is recognize growth corridors for both municipalities. The draft MDP must be revised to be consistent with the IDP as outlined in section 632 (4) of the Municipal Government Act.

5. Alignment to the Interim Growth Plan (IGP)

IGP Section 3.2.2 outlines that municipalities should collaborate to coordinate planning for land-use, infrastructure, and service provision with other municipalities, where appropriate. Rocky View County did not engage in a structured engagement process with The City of Calgary throughout the creation of this significant plan.

In our view, the draft MDP is not in alignment with the principles of the Interim Growth Plan as it has large impacts on regional infrastructure, source water quality, and promotes inefficient use of land. Existing regional infrastructure, including water treatments plants, are shown in IGP Schedule 5: Transmission Corridors – Water. IGP Section 3.5.2.1 c. calls for the provision of "*mitigation measures and policies to address identified/ potential adverse impacts on regionally significant transmission corridor rights-of-way or related infrastructure*." The proposed growth concept may have large impacts on the source water quality for both the Bearspaw and Glenmore Reservoirs.

6. Sourcewater Protection

A strong concentration of primary residential development is proposed to take place in the Bow and Elbow Watersheds which raises concerns around the cumulative impacts of development in the Source Watershed. The draft MDP should include policy statements around how impacts on source water will be mitigated. At present, there is a significant policy gap with regards to the protection of surface water quality and quantity and the need to protect drinking water sources for adjacent municipalities. No specific policies are identified beyond the objective that "drinking water sources are protected" (p.34). The MDP should demonstrate greater commitment to source water protection by strengthening the language, adding action items and protecting the upland geography of the reservoir.

There is presently an inconsistency in the planning approach taken to stepping development back from the Bearspaw Reservoir: while the Glenbow Ranch ASP area proposes development to occur approximately one kilometre away, the MDP does not propose any mitigation measures along the southern side of this regionally significant infrastructure. The MDP could further demonstrate commitment by drawing from the Glenbow Ranch Mediated Agreement which recognized "*the Bearspaw Reservoir as source water for drinking water utilities*".

The draft MDP proposes a western "*Employment Area*" along HWY 1 at HWY 22, where the Springbank Off-Stream Reservoir project (SR-1) is planned to be located. It is unclear how the plan will impact this critical piece of infrastructure for the City and the region, which is needed to mitigate flood events. The City requests that the draft MDP include policy statements to acknowledge SR-1, and policies to ensure there is no negative impacts on SR1 resulting from planning development in this area.

7. Impacts to transportation infrastructure

The draft MDP appears to focus on auto-dependent growth and has the potential for detrimental impacts on Calgary's infrastructure and growth potential in our developing areas. MDP

transportation policies should include specific policies on transit for supporting proposed long-term growth in the County (including potential County provided transit, CMRB regional transit and or private transit provision). Given the significant changes proposed, it would be more effective for the draft MDP to follow the approval of the CMRB Regional Growth Plan to ensure County growth aligns with regional growth priorities. These include regional transit and more compact development within the County and overall region.

The City maintains that development within the County's draft MDP should not have a negative financial, social and environmental impact on Calgary. Due to the potential for detrimental impacts and due to an absence of engagement with The City of Calgary, we are unable to support the Municipal Development Plan and how it proposes to implement the vast areas of priority growth. Calgary Administration request that the draft MDP be referred to the upcoming Rocky View-Calgary Intermunicipal Committee in December for discussion so that our municipalities can achieve a mutually beneficial solution.

Thank you for the opportunity to review and comment on this draft plan. Detailed technical comments are provided in the attachment.

If you have any questions or concerns, please contact Neil Younger, Senior Strategist, Intergovernmental & Corporate Strategy at: neil.younger@calgary.ca or 403.828.1647.

Sincerely,

Kelly

Kelly Cote RPP, MCIP
Manager
Intergovernmental & Corporate Strategy
Deputy City Manager's Office
The City of Calgary
C 403.305.0207 **E** kelly.cote@calgary.ca

cc: Neil Younger, Senior Strategist, The City of Calgary

Attachment: Detailed Technical Comments

Detailed Technical Comments

1. Planning and Development Comments, Intermunicipal Comments

There are a number of areas in the document that present significant issues for our intermunicipal coordination; Municipal Administrations need to work on these areas. For example…

a) Figure 1: **Planning Framework Alignment** – Intermunicipal Development Plans should be below CMRB Growth Plan and above the MDP. The figure shows IDPs outside of the CMRB Growth Plan Framework which it is a statutory plan and subject to it. Also, the figure does not provide an understanding that an MDP is subordinate to IDPs.

b) Figure 2: **Growth Concept Map** identifying Priority Areas for Growth proposes "*Employment Areas*" within Calgary's residential and industrial Growth Areas long identified in the IDP. The proposed land use is inconsistent with the IDP. The City has not been engaged in planning these areas and does not support these areas being priority growth areas for Rocky View County.

c) P.47, Section 4.1.3 Annexation. "*Policy e) New or amended Intermunicipal development plans should reflect the goals and policies of the MDP."* Our MDPs are an important input but are subject to IDPs; we believe the appropriate basis for IDPs is mutual interest and cooperation. As such we cannot support this policy as our future growth areas are impacted by this MDP, which is inconsistent with our IDP. Intermunicipal discussion is required.

d) P.21, Section 2.4.1 Employment Areas. A statement lists characteristics of Employment Areas in *Figure 2* as being "Regulated by existing statutory policy, and/or identified in annexation agreements." Please note that our annexation agreement was an important document to identify growth areas that were jointly agreed to by our municipalities, and to inform the 2012 Intermunicipal Development Plan approved by both Councils. The City of Calgary does not consider Calgary's Growth Areas to be Rocky View County's Employment Areas. We call on the County to recognize and respect the Growth Corridors founded through our mutual annexation agreement and identified in our statutory Intermunicipal Development Plan.

e) The City requests data be provided on amount of population and jobs that can be accommodated in the Growth Concept.

f) The City recommends that growth areas be prioritized and growth management through policy or mapping to ensure appropriate levels of servicing can be provided.

g) The City recommends that additional plans and studies should inform the MDP, most significantly additional transportation studies and the Bearspaw Task Force Trilateral Consensus Report.

h) Figure 2: Growth Concept Map Identifying Priority Areas for Growth proposes a significant amount of residential and employment lands without prioritizing those lands or providing an understanding of the amount of growth contained within those areas. The plan states a 20-year time horizon, The City is requesting the geodemographic information that informed this map and how it is tied to population projections.

i) Section 2.3.1.h.i outlines that maximum densities should be established in ASPs. The City would encourage minimum densities be stated in order to facilitate the growth that provides for more efficient use of land.

j) The City recommends that Section 2.4.1 Employment Areas outline policy for the provision of transit for employment areas.

k) Section 3.1 Financial Sustainability outlines that careful management of growth and development is necessary and a desired assessment split ratio. These policies are not supported throughout the document and within the Growth Concept. There is no prioritization of growth or growth management policies outside of servicing. It is recommended that the plan prioritize growth areas or provide further growth management policies.

l) The draft MDP is silent on a number of areas including equity, Indigenous relations, future of mobility, livability and quality of life. The City recommends Rocky View County consider addressing these policy areas within the MDP.

m) **Planned and Future growth areas map.** Figure 3 identifies unplanned lands beyond North Springbank ASP as "*Planned Areas"*. In addition, plans under review are also identified as "*Planned Areas*" (Springbank, Janet, etc) but without specific guidance on how existing plans will proceed. Will it permit large future intensification? How are plans in process guided?

n) Future Planning Areas. "*Future Planning Areas*" approvals should occur following approval of the CMRB Regional Growth Plan.

2. TRANSPORTATION COMMENTS

a) Major concentrations of auto-dependent development is proposed to be located adjacent to Calgary, which would require a significant need for new or expanded major infrastructure. The City is concerned that this pattern of development will create excessive traffic volumes that could impact Calgary's transportation system, for example, our arterials and connections to Stoney Trail and our developing areas.

- We ask that the draft MDP acknowledge the need to work with Calgary to identify and address infrastructure impacts, and that participation in cost-sharing agreements may be required.

b) Without an identified transit solution or other modes of transportation, the impact of single occupancy vehicle travel is expected to be felt on city networks.

c) Approval of the MDP should occur following approval of the CMRB Regional Growth Plan to ensure County growth aligns with Regional growth priorities. These include regional transit and more compact development within the County and overall region.

3. CALGARY TRANSIT

Please find below comments from Calgary Transit on the Rocky View County MDP. CT's main comments are in relation to the need for greater mention and clarity around transit. Additionally, growth in Rocky View at the City boundary may affect Calgary's ability to develop, with the resulting impact and expectations pressuring Calgary services such as transit.

General Comments:

1. Recommend that a transit section be included similar to the airport/railway section. The content of the section would be indicating priority areas for transit growth corridors, and direction for local area planning (i.e. local area plans which include a regional transit component should provide direct paths of travel available to the transit service, avoid having your transit connection on a major deviation, or having discontinuous road networks that are difficult to connect in a line for a transit service).
2. Regional transit connections should be encouraged where demand exists. Recommend RVC and hamlet administrative authorities consult with Calgary Transit on the planning of such services.
3. Growth areas in an intermunicipal interface area between RVC and Calgary should be planned to include future transit services with minimal retrofitting required.
4. Railway planning is encouraged to consider planning for potential railway expansion in addition to the repurposing of unused lines. Existing rail ROWs may be expanded in the future if needed for capacity purposes, particularly for regional or intercity passenger rail, but potentially also for freight.
5. Suggest adding policies that mention pedestrian and active mode corridors and pathways should connect to transit.
6. Suggest adding section or policies on air quality and GHG emissions, similar to how the plan already mentions water quality. Note that transit can play a beneficial role in maintaining and improving air quality.

Section Specific Comments:

1. **2.3.1(b):** This policy appears to conflict with policies for growth areas and the preferred growth scenario (CMRB), which directs growth into defined transit-supportive corridors.
2. **2.3.1(h)(vi):** We appreciate that new ASPs should address regional transit connections. It would be good to see this indicated on the ASPs we've recently reviewed (i.e. Springbank).

3. **2.3.2:** Suggest adding language that new ASPs for Country Residential should be discouraged in or adjacent to identified growth corridors. This is especially important once the Growth Plan is adopted and TOD corridors are identified.
4. **2.4.1:** Suggest adding policy about 'provision for regional transit connections,' as employment areas are likely to draw employees from the region, of which many rely on transit to get to work. Access to transit on the residential side is great, but if it doesn't connect to the destination then value is diminished.
5. **2.5.2:** Suggest adding a policy mentioning transit connections, similar to what is already included in the Primary Residential Areas and Hamlet Growth Areas sections. This could be a less-binding 'may' policy since Small Hamlets likely have less need for transit than other growth areas, but transit should be mentioned and included as a possibility.
6. **3.2 Transportation, introductory paragraph:** Suggest mentioning that transit can help alleviate pressures on the transportation system.
7. **3.2.1 (e):** Suggest explicitly mention transit should be included in the RVC Transportation Model to create a more accurate representation of trips in the County.

4. Water Resources

Water Resources provides the following comments on the draft Municipal Development Plan (MDP).

Section 1.6 Planning Framework

- There appears to be a major gap in aligning the policies of Area Structure Plans (and subsequent Conceptual Schemes and Master Site Development Plans) to the Land Use Bylaw (and subsequent Redesignations, Subdivisions and Development Permits). Based on Water Resources review of various land use and development applications, The City strongly recommends that this gap is addressed within Rocky View County's planning system in order to ensure orderly sustainable growth that aligns to its MDP. This planning framework gap should also be addressed in Section 1.6.5 – Implementation of Plans

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- A master site development plan should be required prior to development approvals in any hamlet, that includes servicing and an environment impact assessment
- Recommend that servicing agreements must be in place prior to development and land use approvals

SECTION 3.1: FINANCIAL SUSTAINABILITY

- Recommend a discussion of types of services provided and where intermunicipal services are required for different development types

3.1.1: FINANCIAL SUSTAINABILITY POLICIES

- Suggest adding the following language **in bold**:
    - "Prior to approving a development proposal, the County should ensure that **infrastructure servicing has been identified and planned for and** that full cost recovery…."

3.3: NATURAL RESOURCE DEVELOPMENT

3.3.1: AGGREGATE DEVELOPMENT

- suggest adding language requiring an environmental impact assessment as aggregate development has the potential to impact water resources in adjacent municipalities

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- There is a significant policy gap in this section regarding the protection of surface water quality and quantity and the need to protect drinking water sources for adjacent municipalities.
- Where does the MDP commit that the growth approved in the Growth Concept Areas will meet the necessary requirements to not degrade the watershed and, specifically, the water that flows to downstream users? This of keen interest to The City given the extensive growth identified in the Bow and Elbow source watersheds. The language on page 15 "Future development should avoid or mitigate impacts to these areas" would benefit from additional action items or stronger language to help communicate the importance of this.
- A large future planning area is identified along Highway 8, in the Elbow source watershed. The text on page 15 indicates "these areas... will require ASPs or conceptual schemes to demonstrate how future growth is accommodated in a sustainable manner." It is unclear what is meant by this statement. Specific policy language would be helpful.
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source watershed overlays in land use planning decisions through intermunicipal coordination and the CMRB

- The Growth areas outlined in Figure 2 show a strong concentration of primarily residential development taking place in the Bow and Elbow Watershed that raises concerns around the cumulative impacts of development in the Source Watershed. This section should include policy statements around how impacts on source water will be mitigated.

SECTION 3.6 UTILITY SERVICES

- Located on page 5 of the Draft MDP "….the provision of services to these areas can become a long-term burden on the County's finances." How will this be managed for water, wastewater and stormwater services? Page 10 lists all the 'additional Plans' but the list does not include A Master Plan for Water, Wastewater and Stormwater. This Plan would be valuable to the City to further understand the County's approach to deliver efficient and sustainable servicing without detriment/degradation to the watershed.
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- Located on page 48 Action 3.7 "Identify core County services". Additional details on what this could potentially include would be helpful.

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- Please define *carrying capacity* for wastewater treatment systems and how that information will be shared with neighbouring municipalities that could be impacted by potential water quality degradation

3.6.4 STORMWATER MANAGEMENT

- Recommend adding a policy in this section that requires stormwater management plans and regulatory approvals from the Province to be circulated to adjacent municipalities if within 1 km of a shared boundary

SECTION 4.1 INTERGOVERNMENTAL RELATIONSHIPS

- This section should include a policy statement that speaks to promoting and fostering continued partnerships with regional municipalities to create and maintain an ecological network and coordinate on source water protection.

GENERAL COMMENTS:

- On page 18 of the Draft MDP indicates that new ASPs should 'address' 'utility connections'. Additional action items would be helpful to assist in long range planning for utility connections.
- Natural infrastructure (i.e. natural assets and engineered elements) provides important ecological services, and can include wetlands, trees, riparian areas and other open spaces. Integrating natural infrastructure into land use planning can help ensure conservation, support growth and maintain services such as water supply. County-wide policies could be expanded to include principles of natural infrastructure into land use and development decisions.

5. Ecological Features

a) Section 3.5.1 Growth Management is very limited to ecological features. The City recommends that a Growth Management section be drafted that aids in promoting efficient use of land and regional infrastructure.
b) The IDP states that both municipalities should implement ER setback guidelines to protect riparian areas and water quality. The draft MDP should contain policies about ER setbacks.

6. Recreation Considerations and Implications

Summary

- The MDP continues to direct County population growth to areas adjacent to, or in close proximity to Calgary, and provides little to no direction on what recreation services or facilities will be in place to support this growth.
- As noted in the Draft Regional Recreation Study (2020), there is a need for recreation services cost-sharing as it is recognized RVC residents utilize City recreation facilities.
- The majority of the County's growth areas are located west/northwest of Calgary. As a result, City facilities in west and northwest Calgary will likely see the greatest increase in pressure from RVC population growth.
- The County has indicated, through policy, that they will collaborate with the City on regional recreation decision-making.
- Recognizing that intermunicipal collaboration is a provincial priority and a priority for all municipalities within the CMR, there is a need for additional details on how RVC plans to coordinate recreation service delivery with municipalities to promote sustainability, economic and community well-being.

Specific Comments

Guiding Principles – Community Development

- In the MDP, Rocky View County has said it will build resilient communities and welcoming neighbourhoods through greater access to recreation amenities, valued gathering spaces and creative design (1.3) No specific information, however, is provided regarding the current approach being used to address the recreation needs of residents through agreements with surrounding municipalities (including Airdrie, Chestermere and Cochrane, not including Calgary) and the tools being considered to achieve their vision moving forward (e.g. cost sharing, levies, Intermunicipal Collaboration Frameworks)

Regional Plans: Calgary Metropolitan Regional Board Growth Plan (1.6.2)

- The MDP identifies that RVC will work in the spirit of collaboration with regional partners… to find mutually beneficial solutions to planning and development challenges… (Guiding Principle 6). However, more details are needed within the Intergovernmental Relationships section (4.1) on the approach envisioned. Specifically with respect to the CMRB Regulation AR190/2017. It sets out the objectives for the CMRB Servicing Plan, which includes facilitating the orderly, economical and environmentally responsible growth in the region. The CMRB has identified recreation as a key area for collaboration on service provision. There is no specific direction on how the Options for Enhancing Regional Recreation document, that was prepared by the

Recreation Servicing TAG and unanimously approved by the CMRB, will be applied. For example, the following does not appear to be incorporated into the MDP:

Regional Recreation Definition

- A regional recreation facility, space, program or service has a realistic potential of use by, and broader benefits to, residents from outside the municipal boundaries in which it is provided.

Vision

- Municipalities enhance coordination, optimize public investment, and leverage resources from within and outside the region to support regional recreation facilities, programs and services. These regional recreation assets and services enhance coordination, optimize public investment, and leverage resources from within and outside the region.

STATUTORY PLANS: INTERMUNICIPAL DEVELOPMENT PLANS (1.6.3)

- No specific direction is provided on coordinating planning for land-use, infrastructure, and service provision to ensure "Both municipalities are committed to working together to achieve coordination wherever possible so that the effect that we have on one another and our residents is positive" (IDP). In particular with respect to:
  - Explore the feasibility of developing overall intermunicipal recreation master plan (IDP 9.1.1 (d))
  - Cooperate in the exploration of cost-effective ways of delivering recreational services that benefit both municipalities (IDP 9.1.1 (f))

GROWTH AREAS (2.2)

- Provision of recreational, community, social and cultural facilities or amenities will be necessary to support the anticipated population growth of 17,576 by 2040. Specific direction on how the needs will be identified and met is not provided to help guide ASP land use planning, and service delivery decisions and proactively address the risk of Rocky View residents being reliant upon services provided within The City of Calgary.
- Residential land uses are the primary form of development of development in Rocky View County. The focus on residential development without specific policies that guide the provision of recreational, community, social and cultural facilities within Rocky View County will be detrimental to The City of Calgary without commensurate increase in compensation by the County to The City of Calgary.
- Existing Area Structure Plan areas or Conceptual Scheme areas have been re-designated as priority growth areas. Most of these areas are adjacent to Calgary (e.g. Bearspaw, Balzac West, Elbow Valley). They have remaining development capacity and will continue to grow.
- A new residential growth area, Elbow Valley (West), has been added. This area is located southwest of Calgary along Highway 8.
- As most of the County's population growth is planned to be near Calgary, City recreation facilities in close proximity to RVC and near major highways will likely see increased pressure from County residents (e.g. Rocky Ridge YMCA, Village Square Leisure Centre).

- Policies identify that recreation uses should be located in Hamlets, Primary Residential Areas, or Employment (2.6.1 a), but can be located elsewhere (2.6.1 c). No specific direction, however, is given to where, or how many recreation facilities are planned to support additional population growth.
- Policies indicate that recreation investments will be prioritized based on population density and resident need (3.8.5 b), and the County will collaborate with neighbouring municipalities for regional recreation decision-making (3.8.5 e). More details are required on what the decision making process will entail.

GROWTH CONCEPT MAP (FIG. 2)

- In addition to the provincial parks, existing and planned regional recreation facilities and amenities (as defined above) (e.g. Springbank Park for all Seasons, regional pathways respectively) should be included within the Growth Concept Map or additional Community Services Map so that regional recreation services gaps are illustrated.

POLICY DIRECTION

- Policies identify that recreation uses should be located in Hamlets, Primary Residential Areas, or Employment (2.6.1 a), but can be located elsewhere (2.6.1 c). No specific direction, however, is given to where, or how many recreation facilities are planned to support additional population growth.

PERFORMANCE MEASURES (TABLE 03)

- An increase in the number of facility operations cost sharing agreements is identified as an MDP performance measure. However, no enabling or supporting is policy is included that addresses recreation facility cost sharing agreements.

Recreation	Number of facility operations cost sharing agreements	Increase
	Number of operational and capital grants to non-profits	Increase
	Number of Recreation Master Plan partnership recommendations implemented	Increase

CONCEPTUAL SCHEME REQUIREMENTS (APPENDIX C)

A community needs assessment should be included as a requirement for Conceptual Schemes and ASPs to ensure the "appropriate provision of municipal infrastructure and community services. Satisfying these aspirations will involve the assessment of community needs across the County, partnerships with community stakeholders and service providers, recruitment of regional institutions, public consultation, and allocation of land and resources." (3).

November 23, 2020

Rocky View County
262075 Rocky View Point
Rocky View County, Alberta T4A 0X2

Attention: Dominic Kazmierczak, Supervisor Planning (Policy)

RE: PROPOSED ROCKY VIEW COUNTY MUNICIPAL DEVELOPMENT PLAN (COUNTY PLAN)

Dominic,

Thank you for the opportunity to comment on the proposed County Plan. We recognize that it is a high-level document that will guide development in the County and commend you for the time and effort spent in its creation. Please find our comments below on some of the policies:

Section 3.2.1 Transportation Planning and Development

b) Partner with other municipalities and developers to co-ordinate transportation improvements and the expansion of transportation infrastructure.

c) Transportation network development shall be based on existing development, future growth areas, area structure plans, and interconnectivity with adjacent municipalities.

As per the statements above, we look forward to opportunities in the future to collaborate on issues of mutual interest. In particular, a discussion on the priority growth areas in Janet and Conrich, which extend along Chestermere's north and south boundaries. There is the potential that Chestermere streets could be used as connections between Rocky View County residential and employment areas. Please take into consideration the Calgary/Chestermere Intermunicpal Development Plan has identified Range Road 284 as an interface street and Section 4.1 Interface Street Classification and Character states the following:

1. *The Interface Street should have a unique functional classification to enable the vision, core ideas, intents and policies of The Plan. The Interface Street will become a modified street classification that will reflect standards in Chestermere and Calgary.*

2. *The Plan Area shall be integrated with regional and local transportation networks.*
3. *The Plan Area should allow for access to the Local Street Network using all travel modes.*
4. *Direct, comfortable and safe pedestrian, cyclist, transit and motor vehicle travel along and across the Plan Area shall be provided.*
5. *The Interface Street should provide for movement of people and goods throughout the Plan Area.*
6. *The Interface Street should accommodate a design speed of 60 km per hour.*

3.4.3 Confined Feeding Operations

b) A confined feeding operation, including its minimum distance of separation, should not be located within the boundary or notification zone of an intermunicipal development plan, statutory planning area, hamlet, residential area, institutional use, or federal, provincial, or municipal park or recreation area.

Since the City of Chestermere does not have an Intermunicipal Development Plan with Rocky View County, please consider firmer policy language to ensure that confined feeding operations are at a distance of separation from municipal neighbours.

3.8.1 Park Development, Connectivity, and Maintenance

b) Partner and collaborate with adjacent municipalities, the Province, school divisions, conservation agencies, community groups, developers, and other organizations to develop and maintain the parks and open space system, pathways and trails network, and associated amenities.

We appreciate the willingness to partner and collaborate with adjacent municipalities and look forward to continue our discussions on planning for regional recreation.

We look forward continue and strengthen our positive working relationship with Rocky View County. Please do not hesitate to contact me if you have any further questions or concerns regarding these comments at (403) 207-7112.

Sincerely,

Benazir Thaha Valencia
Senior Planner, Community Growth & Infrastructure
City of Chestermere
bthaha@chestermere.ca

Comment #	Town of Cochrane Comments	Rocky View County Response
1	Cochrane has a unique identity with rural character and the gateways into our community are important to maintain this identity and significance within the region. These gateways are identified as Highway 22 north and south of the Town as well as Highway lA east and west of the town. An important piece of the Cochrane Community Vision is that "The Town will collaborate with our neighbours to ensure development within this area reinforces the rural character of these lands." The lands to the north and east are identified as future residential growth areas in the County's draft MOP, which has the potential to affect the rural character and identity of the area and the gateways surrounding the Town of Cochrane. The Town asks that these gateways receive more attention and consideration as they are very significant to the Town, Rocky View County and identity of the region.	Rocky View County remains committed to intermunicipal collaboration with the Town of Cochrane, and believes that these concerns are best addressed at the ASP stage. The County is currently reviewing the Bearspaw ASP and has been receptive to the Town's concerns regarding development adjacent to the 1A leading into Cochrane from the east. To further address these concerns, Rocky View County has also revised 2.3.1 c) to the following: Development within Primary Residential areas shall be in accordance with applicable IDPs, area structure plans, and/or conceptual schemes. The Town believes ensuring the rural character and identity being reinforced within gateways into Cochrane is something that is beneficial to Cochrane, RVC and the region. We do not feel the proposed policy amendment captures/reflects the importance of these areas nor provides the specific direction needed to ensure they are recognized and acknowledged at ASP and/or conceptual scheme development stage. The Town requests these important gateways are reflected in the MDP.
2	The MOP Project Stages state that Stage 4 of Drafting the MOP conducted in the Winter- Spring of 2020 included the opportunity for neighbouring municipalities and regional partners to review and comment on the draft MOP. We do not seem to have record of this occurring. Also, other phases of engagement were detailed on the project website, we are wondering about the feedback received regionally for this plan. If so, is this something that can be shared?	Rocky View County has prepared public feedback reports for each phase of the project that can be found on the project website at www.rockyview.ca/MDP. The County also remains committed to ongoing intermunicipal collaboration and engagement on the proposed MDP, including earlier meetings with Town of Cochrane personnel and this draft MDP review.
3	The Town of Cochrane understands and appreciates the Vision and Guiding Principles outlined in the draft Plan, particularly Guiding Principle 6- Partnerships. The Town values our relationship with Rocky View County and looks forward to working together collaboratively to find mutually beneficial solutions to planning and development challenges as stated in the Plan.	Noted.
4	The draft MOP includes a number of proposed residential and employment growth areas. It is understood a development suitability analysis, utilizing factors such as access to existing transportation infrastructure and servicing, was used to identify the proposed growth areas. This has resulted in the Primary Residential priority growth areas being located primarily west of the City of Calgary, including the northern and eastern boundaries of the Town of Cochrane, and the proposed Employment Areas being located on the east side of the City of Calgary. Since the adoption of the current County MOP in 2013 roughly 5,000 new residents have moved to Rocky View County. The majority of these residents located in the hamlets of Langdon and Conrich, with Langdon being in the top two residential population growth areas in the County since 1996. Section 2.5 Hamlet Development states hamlets are home to the majority of County residents and should be the priority for residential development over the next 20 years. Should this be the case, why does the Primary Residential Priority Growth Area expand well beyond the hamlet boundaries west of the City of Calgary?	The Primary Residential Priority Growth Area is intended to capture a range of potential development locations, enabling the proposed MDP to be flexible and responsive to changing market conditions over the next 20 years. This pragmatic approach minimizes future housekeeping amendments that would otherwise result from changes in the regional economy while still providing a clear vision for where and how the County intends to grow. Rocky View County would also like to note that although the proposed MDP sets the overall growth locations, ASPs will be required for each area where new growth occurs or where the County looks to amend its development form in an existing ASP. These ASPs will require thorough intermunicipal collaboration and alignment with the Regional Growth Plan before being approved by the CMRB.

5	*2.5.2 Small Hamlets* Specifically, Cochrane North/Cochrane Lake is identified as a Small Hamlet and is located in the Primary Residential Priority Growth Area, yet Section 2.5.2 Small Hamlets states that "The County will continue to maintain existing levels of service for these rural communities, ensuring sustained quality of life for residents. Due to their more isolated location, and the availability of more sustainable development locations across the County, the County may not prioritize infrastructure and servicing upgrades in Small Hamlets." Additionally, Policy 2.5.2 a) states - "New Development should occur within the existing hamlet boundary as opposed to expanding boundaries". The Cochrane North ASP only identifies roughly 2 quarter sections as hamlet development, yet the priority residential growth boundary in the draft Plan includes a significantly larger area. This illustrates an inconsistency with the policy direction noted above, as well as inconsistencies between the two plans.	Rocky View County respectfully disagrees that there is misalignment between these policy directives. The imperative for the County to invest or not invest in infrastructure exists independent of proposed new growth areas, particularly in light of the County's developer-pays approach to servicing outside of areas already served by municipal infrastructure. The Cochrane North Plan has identified hamlet development as noted, but also provides for cluster and infill development across the wider plan area. It is the County's perspective that the proposed MDP policies state that the hamlet development forms should not expand into the wider ASP area. However, the development of cluster or master planned communities outside the hamlet area are distinct and can rely upon developer-led servicing solutions.
6	The Rocky View County / Town of Cochrane IDP states that all residential development within the IDP area is to take into account urban overlay principles. The Town recommends this policy be reflected in the MDP for areas proposed for residential development adjacent to urban centres. This will help ensure future orderly urban redevelopment where applicable.	Rocky View County has revised 2.3.1 c) to the following: Development within Primary Residential areas shall be in accordance with applicable IDPs, area structure plans, and/or conceptual schemes.
7	Many policy sections throughout the proposed Plan identify what is to be included in future Area Structure Plans, as well as the requirements that need to be addressed before further development will be approved. Some examples include: • Section 2.3.1 h) identifies items to be incorporated into new ASPs within the residential priority growth areas; • Section 2.3.2 b) speaks to considerations to be given when proposing larger scale Country Residential Development within the priority residential growth area; • Section 2.5.1 c) identifies items to be addressed in an ASP or ARP for a Hamlet Growth Area. These sections speak to considering the impacts on County or existing infrastructure. The Town requests that these policy areas also specifically include potential impacts to municipalities in close proximity that would expectedly serve these growth areas in terms of transportation impacts, recreational impacts, school need impacts, servicing impacts, etc. Additionally, the Town requests that the Hamlet Growth Areas section include policies for the provision of school sites to support the school needs in these priority residential growth areas.	Rocky View County has revised 2.3.1 (h) and 2.5.1 (c) to include the following clauses: 2.3.1 (h) vii) Where the ASP is located in areas adjacent to an intermunicipal partner, appropriate intermunicipal collaboration on key cross-boundary concerns. 2.5.1 (c) x) Intermunicipal collaboration and key cross-boundary concerns. We are in agreement with the proposed policy inclusions however we would ask that they be included for all the apprpriate sections (e.g. employment areas, Country Residential) or more simply add these polcies to the County Wide Policy section. We would also note that these inclusions do not appear to be in the red lined versions that was sent over.
8	*2.3.1 Primary Residential Areas* Policy 2.3.1 f) states that "Primary Residential Areas should receive County services identified in the applicable area structure plans, conceptual schemes or County bylaws." Assuming these services are necessary to support these proposed priority growth areas, this should become a "shall" statement to ensure the necessary servicing is provided to facilitate the proposed development.	RVC employs a range of servicing solutions, not all of which require County servicing. Although municipal servicing is usually preferred, the current planned densities and potential future densities for Bearspaw and Cochrane are not likely to warrant a comprehensive County servicing solution and will likely rely on local water co-ops and private or communal waste water systems. Many local co-operatives exist and are better poised to service new development than the County is in certain contexts, and as such, an imperative directive is not appropriate.

9	The Town appreciates the inclusion of policies that promote partnerships with different levels of government and neighbouring municipalities. Particularly: • Policy 3.2.1 a) and b), which speak to partnerships with the Province, neighbouring municipalities and developers to coordinate on regional transportation corridors and expansion of transportation infrastructure; • Policy 3.3.1 e) regarding cooperation between municipalities relating to aggregate activities and coordination on haul routes and mitigation of impacts on adjacent land uses; • Objectives under section 3.8 - specifically "Rocky View County partners and collaborates with neighbouring municipalities and other organizations in the development, use and maintenance of recreation facilities, parks, pathways and trails"; • Policy 3.8.5 e) "Collaborate with neighbourhing municipalities for regional recreation decision making"; and • The inclusion of Section 3.9. Partnerships working to ensure avoidance of duplicating services and the costs associated with that are supported and welcomed.	Noted.
10	The inclusion of Policies 3.8.3 h) and i) are important to the Town of Cochrane. These policies relate to: determining the amount, type, location and shape of reserve lands; consultation with the adjacent municipality prior to determining the reserve requirement; as well as consultation with an IDP partner municipality prior to the disposal of reserve land within that IDP area. This is an area that has become increasingly important as the Town addresses the need for open space through the facilitation of urban redevelopment in 'rural' developed areas within our boundary. Although this is already included in Policy 2.9.2.1 of the IDP, the Town requests the deferral of reserve land within proximity of urban centres be the standard unless dedication of land is necessary for the developing community. In this context, the Town requests cash-in-lieu of reserve land be taken only when necessary and where there is no other alternative. This helps ensure potential urban development of these lands has a possibility of providing necessary school and park sites in the future.	As the IDP sits above the proposed MDP in the policy hierarchy, Rocky View County does not see a need to replicate an existing policy. Such MR matters will be addressed at subdivision stage. The Town still requests that this policy be included within the MDP. This is a very important issue for the Town as we are currently facing issues in relation to these types of situations. When urban redevelopment occurs we need to be certain that deferred MR is available to plan for a complete community or that MR has been thoughtfully and necessarily dedicated during the inital subdivision and that it has not prevously been accpeted as cash in lieu. Should strong policy not be in place there will be no guidance available at the time of subdivision to address these matters.
11	Policy 3.8.4 a) describes the circumstances the County would request either the dedication of Environmental Reserve or the provision of an Environmental Reserve Easement. Understanding the restrictions in Section 663 of the MGA, why would the subdivision of commercial lands or agricultural parcels over 12 hectares be automatically excluded from providing ER should there be a significant environmental feature present?	The section referenced by the Town does not say the County would not take Environmental Reserve on commercial lands.

12	The "Open Land" concept is interesting, and the Town is curious about Policy 2.3.1 l and the dedication of excess open land and allowance for density bonusing. Considering uses that are typically required for a development are included under the open land definition, such as parks, recreation, public utility lots, MR dedication, stormwater and wastewater treatment areas, institutional uses and flood fringe areas, how difficult will achieving density bonusing be and what will ASPs include as the desired amount?	These concerns will be addressed at the ASP stage of development. The draft new Springbank ASP provides an example of how this will be incorporated.
13	There is a discrepancy between Policies 3.5.3 b) and 3.6.3 b) related to wastewater treatment systems. Policy 3.5.3 b) states wastewater treatment systems should not exceed the land's carrying capacity, and 3.6.3 b) states wastewater treatment systems shall not exceed the land's carrying capacity, with the later being the Town's wording preference.	Rocky View County has revised this text to reflect the Town's preferred wording consistently.
14	While the Town of Cochrane understands the County's desire to grow and also expand its non-residential tax base, the Town feels the MDP is being considered for adoption prematurely before the adoption of the Regional Growth Plan. The draft MDP promotes partnerships and working in a spirit of collaboration with regional partners as one of its Guiding Principles. As such we respectfully request the adoption of the draft MDP not proceed until the regional Growth Plan is completed and there is ensured consistency between the two plans.	Rocky View County respectfully disagrees with the Town's position on approval of the proposed MDP under the Interim Growth Plan. The Town of Cochrane supported adoption of the Okotoks MDP, and a number of MDPs and ASPs have gone before the CMRB over the past year. It is the County's perspective that this is what the Interim Growth Plan and IREF were designed for, and no transition period was enacted in the regulations or since by the Board. Although Cochrane did not challenge the approval of the Okotoks MDP as the CMRB, the messaging provided was the same as what was included in this response. The Town continues to stand by the statement ~~made as we feel that moving forward at this time to identify growth areas~~ and employment lands is against the priciples and spirit of regional colloboration that we are attempting to achieve through the Regional Growth Board.

TOWN OF COCHRANE
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cochrane
HOW THE WEST IS NOW

Rocky View County
262075 Rocky View Point
Rocky View County, AB T4A 0X2
Attn: Dominic Kazmierczak

November 27, 2020

RE: Rocky View County Draft Municipal Development Plan Circulation

Dear Mr. Kazmierczak,

Thank you for the opportunity to review and provide comments on Rocky View County's Draft Municipal Development Plan. Administration has reviewed the draft document and has the following comments.

Cochrane's Community Vision

An important guiding document for the Town of Cochrane is the Cochrane Community Vision. Specific to this draft MDP the Cochrane Community Vision speaks to the importance of open spaces, natural areas and stewardship protecting the landscape within our town and beyond. The Town recognizes the importance of connected and accessible networks of natural areas and protected waterways not only within the town but through connections to the surrounding areas as well. The Community Vision aspires for green corridors that protect and preserve these important features and areas within the town and beyond. The Big Hill Creek, Glenbow Ranch Provincial Park, Jumping Pound Creek and the Bow River are all identified as these green corridor areas and as these features all extend well beyond our boundaries we strongly welcome the inclusion of policies within the MDP that speak to regional recreational decision making and would like to ensure that such policies extend to regional coordination on the protection and preservation of these important natural land features as well.

The Cochrane Community Vision also includes mapping relating to the future boundaries of the town. Over the next 30 years growth is anticipated to take place within the existing Town boundaries, however beyond 30 years the Town may need to begin looking to add additional land to support future commercial, light industrial, residential and open space needs. In order to begin planning for this future growth the Town has identified future land needs based on natural extensions of the community. The areas identified at this time include lands west, south and to the northeast of the current town boundaries. These areas identified for future growth of the town do not align with the areas for future growth that are being identified in the County's draft MDP, that being directly north and east of the Town of Cochrane. This creates issues for future regional servicing, collaboration on regional recreation and protection of natural areas.

Finally, one additional component of the Cochrane Community Vision is the rural character areas and key gateways into Cochrane and the region. Cochrane has a unique identity with rural character and the gateways into our community are important to maintain this identity and significance within the region. These gateways are identified as Highway 22 north and south of the Town as well as Highway 1A east and

west of the town. An important piece of the Cochrane Community Vision is that "The Town will collaborate with our neighbours to ensure development within this area reinforces the rural character of these lands." The lands to the north and east are identified as future residential growth areas in the County's draft MDP, which has the potential to affect the rural character and identity of the area and the gateways surrounding the Town of Cochrane. The Town asks that these gateways receive more attention and consideration as they are very significant to the Town, Rocky View County and identity of the region.

Intermunicipal Engagement

The MDP Project Stages state that Stage 4 of Drafting the MDP conducted in the Winter – Spring of 2020 included the opportunity for neighbouring municipalities and regional partners to review and comment on the draft MDP. We do not seem to have record of this occurring. Also, other phases of engagement were detailed on the project website, we are wondering about the feedback received regionally for this plan. If so, is this something that can be shared?

Vision and Guiding Principles

The Town of Cochrane understands and appreciates the Vision and Guiding Principles outlined in the draft Plan, particularly Guiding Principle 6 – Partnerships. The Town values our relationship with Rocky View County and looks forward to working together collaboratively to find mutually beneficial solutions to planning and development challenges as stated in the Plan.

Priority Growth Areas

The draft MDP includes a number of proposed residential and employment growth areas. It is understood a development suitability analysis, utilizing factors such as access to existing transportation infrastructure and servicing, was used to identify the proposed growth areas. This has resulted in the Primary Residential priority growth areas being located primarily west of the City of Calgary, including the northern and eastern boundaries of the Town of Cochrane, and the proposed Employment Areas being located on the east side of the City of Calgary. Since the adoption of the current County MDP in 2013 roughly 5,000 new residents have moved to Rocky View County. The majority of these residents located in the hamlets of Langdon and Conrich, with Langdon being in the top two residential population growth areas in the County since 1996. Section 2.5 *Hamlet Development* states hamlets are home to the majority of County residents and should be the priority for residential development over the next 20 years. Should this be the case, why does the Primary Residential Priority Growth Area expand well beyond the hamlet boundaries west of the City of Calgary?

Specifically, Cochrane North/Cochrane Lake is identified as a Small Hamlet and is located in the Primary Residential Priority Growth Area, yet Section 2.5.2 Small Hamlets states that "The County will continue to maintain existing levels of service for these rural communities, ensuring sustained quality of life for residents. Due to their more isolated location, and the availability of more sustainable development locations across the County, the County may not prioritize infrastructure and servicing upgrades in Small Hamlets." Additionally, Policy 2.5.2 a) states - "New Development should occur within the existing hamlet boundary as opposed to expanding boundaries". The Cochrane North ASP only identifies roughly 2 quarter sections as hamlet development, yet the priority residential growth boundary in the draft Plan includes a significantly larger area. This illustrates an inconsistency with the policy direction noted above, as well as inconsistencies between the two plans.

Growth Impact Considerations

1. The Rocky View County / Town of Cochrane IDP states that all residential development within the IDP area is to take into account urban overlay principles. The Town recommends this policy be

reflected in the MDP for areas proposed for residential development adjacent to urban centres. This will help ensure future orderly urban redevelopment where applicable.

2. Many policy sections throughout the proposed Plan identify what is to be included in future Area Structure Plans, as well as the requirements that need to be addressed before further development will be approved. Some examples include:
    - Section 2.3.1 h) identifies items to be incorporated into new ASPs within the residential priority growth areas;
    - Section 2.3.2 b) speaks to considerations to be given when proposing larger scale Country Residential Development within the priority residential growth area;
    - Section 2.5.1 c) identifies items to be addressed in an ASP or ARP for a Hamlet Growth Area.

    These sections speak to considering the impacts on County or existing infrastructure. The Town requests that these policy areas also specifically include potential impacts to municipalities in close proximity that would expectedly serve these growth areas in terms of transportation impacts, recreational impacts, school need impacts, servicing impacts, etc. Additionally, the Town requests that the Hamlet Growth Areas section include policies for the provision of school sites to support the school needs in these priority residential growth areas.

3. Policy 2.3.1 f) states that "Primary Residential Areas should receive County services identified in the applicable area structure plans, conceptual schemes or County bylaws." Assuming these services are necessary to support these proposed priority growth areas, this should become a "shall" statement to ensure the necessary servicing is provided to facilitate the proposed development.

4. Section 2.3.1 *Primary Residential Areas* speaks to areas where residential development and ancillary commercial and industrial development will be the predominant land uses. However, there are no policies included in that section that describe or guide the nature and scale of the proposed commercial or industrial development. Further, in Section 2.4.2 Neighbourhood Servicing Commercial within the Employment Area Section of the MDP, more information is provided regarding what these land uses should achieve, including providing social and community meeting places, enabling employment opportunities, and offering goods and services to the local area. Policies in 2.4.1 of the Employment Area section do not seem to align with locating these commercial and industrial uses within the Primary Residential Area. These policies prioritize commercial and industrial uses being located in the Employment Area to minimize land use conflicts with non-commercial and industrial uses and ensure proximity to appropriate servicing and infrastructure (including the transportation network). The Town would like to better understand the type and scale of the ancillary commercial and industrial uses that would be contemplated within the Primary Residential Area and would recommend policies for these uses be included in that section of the MDP.

<u>Partnership Related Policies</u>

The Town appreciates the inclusion of policies that promote partnerships with different levels of government and neighbouring municipalities. Particularly:

- Policy 3.2.1 a) and b), which speak to partnerships with the Province, neighbouring municipalities and developers to coordinate on regional transportation corridors and expansion of transportation infrastructure;
- Policy 3.3.1 e) regarding cooperation between municipalities relating to aggregate activities and coordination on haul routes and mitigation of impacts on adjacent land uses;

- Objectives under section 3.8 - specifically "Rocky View County partners and collaborates with neighbouring municipalities and other organizations in the development, use and maintenance of recreation facilities, parks, pathways and trails";
- Policy 3.8.5 e) "Collaborate with neighbourhing municipalities for regional recreation decision making"; and
- The inclusion of Section 3.9.

Partnerships working to ensure avoidance of duplicating services and the costs associated with that are supported and welcomed.

Reserve Lands

The inclusion of Policies 3.8.3 h) and i) are important to the Town of Cochrane. These policies relate to: determining the amount, type, location and shape of reserve lands; consultation with the adjacent municipality prior to determining the reserve requirement; as well as consultation with an IDP partner municipality prior to the disposal of reserve land within that IDP area. This is an area that has become increasingly important as the Town addresses the need for open space through the facilitation of urban redevelopment in 'rural' developed areas within our boundary. Although this is already included in Policy 2.9.2.1 of the IDP, the Town requests the deferral of reserve land within proximity of urban centres be the standard unless dedication of land is necessary for the developing community. In this context, the Town requests cash-in-lieu of reserve land be taken only when necessary and where there is no other alternative. This helps ensure potential urban development of these lands has a possibility of providing necessary school and park sites in the future.

Policy 3.8.4 a) describes the circumstances the County would request either the dedication of Environmental Reserve or the provision of an Environmental Reserve Easement. Understanding the restrictions in Section 663 of the MGA, why would the subdivision of commercial lands or agricultural parcels over 12 hectares be automatically excluded from providing ER should there be a significant environmental feature present?

Open Land

The "Open Land" concept is interesting, and the Town is curious about Policy 2.3.1 I and the dedication of excess open land and allowance for density bonusing. Considering uses that are typically required for a development are included under the open land definition, such as parks, recreation, public utility lots, MR dedication, stormwater and wastewater treatment areas, institutional uses and flood fringe areas, how difficult will achieving density bonusing be and what will ASPs include as the desired amount?

Wastewater Treatment

There is a discrepancy between Policies 3.5.3 b) and 3.6.3 b) related to wastewater treatment systems. Policy 3.5.3 b) states wastewater treatment systems should not exceed the land's carrying capacity, and 3.6.3 b) states wastewater treatment systems shall not exceed the land's carrying capacity, with the later being the Town's wording preference.

MDP Adoption Timing

The Town of Cochrane recognizes both the Town of Cochrane and Rocky View County are members of the Calgary Metropolitan Region Board and understand that the final Growth Plan is required to be completed by March 1st, 2021. The intent of the Growth Plan is to arrive at regionally agreed upon areas for growth of different land use types. The draft MDP establishes its own set of growth areas arrived at independently

and includes Implementation Actions in Section 4.2 that amend, expand or draft new Area Structure Plans to facilitate the development of these County appointed growth areas.

While the Town of Cochrane understands the County's desire to grow and also expand its non-residential tax base, the Town feels the MDP is being considered for adoption prematurely before the adoption of the Regional Growth Plan. The draft MDP promotes partnerships and working in a spirit of collaboration with regional partners as one of its Guiding Principles. As such we respectfully request the adoption of the draft MDP not proceed until the regional Growth Plan is completed and there is ensured consistency between the two plans.

Thank you again for allowing the Town to review and comment on your draft MDP. We appreciate the opportunity and look forward to further discussion.

Sincerely,

Riley Welden, RPP
Acting General Manager, Development & Community Services

Mountain View
COUNTY

November 19, 2020

Sent via email: dkazmierczak@rockyview.ca

Rocky View County
911 – 32 Avenue NE
Calgary, AB
T2E 6X6

Attention: Dominic Kazmierczak

Dear Mr. Kazmierczak:

Re: Rocky View County Draft Municipal Development Plan

Thank you for your email dated October 21, 2020 with respect to the above noted matter. The email and material were circulated to Planning and Development Services as well as the Operational Services.

There were no comments on this circulation from Planning and Development Services nor Operational Services. Thank you for your consideration to include us in your referral agencies.

Sincerely,

Lee-Ann Gaudette, Administrative Assistant
Planning and Development Services
/lg

T 403.335.3311 1.877.264.9754 F 403.335.9207
1408 - Twp Rd 320 Postal Bag 100 Didsbury, AB, Canada T0M 0W0
www.mountainviewcounty.com

Dominic Kazmierczak

From: Merel Jarvis <merelj@crossfieldalberta.com>
Sent: November 3, 2020 11:11 AM
To: Dominic Kazmierczak
Subject: [EXTERNAL] - FW: Rocky View County MDP Review
Attachments: RVC_MDP-Draft.pdf

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

Good morning Dominic,

Thank you for providing the Town of Crossfield the opportunity to review the RVC MDP draft, we advise that the town has no items of concern.

Take care,

Merel

Merel Jarvis | Development & Community Standards

Town of Crossfield | www.crossfieldalberta.com
PH: (403) 946-5565, extension 223 | **Fax:** (403) 946-4523
Office: 1005 Ross Street, Crossfield, AB T0M 0S0
Mailing: PO Box 500, Crossfield, AB T0M 0S0

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From: Lindsey Nash <lindseyn@crossfieldalberta.com>
Sent: October 21, 2020 4:25 PM
To: Merel Jarvis <merelj@crossfieldalberta.com>
Cc: Ken Bosman <kenb@crossfieldalberta.com>; Mustafa Hashimi <mustafah@crossfieldalberta.com>
Subject: FW: Rocky View County MDP Review

From: DKazmierczak@rockyview.ca <DKazmierczak@rockyview.ca>
Sent: October 21, 2020 4:19 PM
To: DKazmierczak@rockyview.ca
Subject: Rocky View County MDP Review

Rocky View County Draft Municipal Development Plan

Please find attached a draft of Rocky View County's new Municipal Development Plan for your review and comment.

For further details on the MDP review process and next steps, please refer to the project webpage at:

www.rockyview.ca/MDP

County Administration is aiming to present the final draft MDP to Council before the end of the year and would therefore request that comments are received by **20 November, 2020**.

Thanks,

DOMINIC KAZMIERCZAK
Supervisor Planning (Policy) | Planning Services

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

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Dominic Kazmierczak

From: Diane Bodie <diane.bodie@wheatlandcounty.ca>
Sent: November 19, 2020 11:03 AM
To: Dominic Kazmierczak
Subject: [EXTERNAL] - RE: Rocky View County MDP Review

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Good Morning,

Wheatland County has no comments regarding the MDP.

Sincerely,

Diane Bodie
Administrative Assistant to Community and Development Services,
Wheatland County

242006 Range Road 243
HWY 1 RR 1, Strathmore AB, T1P 1J6

Phone: 403-361-2024

www.wheatlandcounty.ca

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From: DKazmierczak@rockyview.ca <DKazmierczak@rockyview.ca>
Sent: October 21, 2020 4:19 PM
To: DKazmierczak@rockyview.ca
Subject: Rocky View County MDP Review

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Thanks,

DOMINIC KAZMIERCZAK
Supervisor Planning (Policy) | Planning Services

ROCKY VIEW COUNTY
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Phone: 403-520-6291
DKazmierczak@rockyview.ca | www.rockyview.ca

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