ROCKY VIEW COUNTY

Regional Off-site Levy Bylaw Updates

What We Heard Report

Prepared: December 2024

Table of Contents

ROCKY VIEW COUNTY'S REGIONAL OFF-SITE LEVY BYLAW

WHAT WE HEARD – FALL 2024 FEEDBACK SESSIONS

Introduction

This report provides additional information on updates to the current offsite levies as well as for a proposed new one. These include, the Regional Offsite Water and Wastewater Levy, Stormwater Levy, Transportation Levy, and a new Community Recreation Levy. On July 23, 2024, Council approved the first reading of the Regional Offsite Levy Bylaws, including the proposed Community Recreation Levy. Following this, details of the four bylaws were shared with stakeholders and the public to ensure transparency, clarify the County's methodology and requirements, and outline the approach to implementation. The intent of this process is to gather feedback and input, bring it back to Council for consideration, and provide recommendations that align with the County's strategic financial goals while ensuring appropriate levies are established to support growth. This report presents the feedback received from stakeholders, including key themes, concerns, and suggestions raised during consultations. It also provides the County's responses to address these comments, clarify any misconceptions, and outline how stakeholder input has been considered in formulating the recommendations. By summarizing this feedback and response, the report aims to demonstrate transparency and ensure that stakeholders' perspectives are appropriately reflected in the decision-making process.

Targeted Consultation

The four proposed Off-Site Levy Bylaws primarily impact individuals or organizations seeking land development, particularly developers focused on commercial, industrial, or residential projects. Recognizing the importance of engaging those directly affected, Administration implemented a targeted consultation strategy by reaching out to key stakeholders, including BILD Calgary Region (Building Industry and Land Development Association), Rocky View Forward, and other representatives from the development industry.

To ensure full engagement and transparency, information was shared through multiple channels. In addition to targeted outreach, all County residents were provided opportunities to access detailed information, ask questions, and provide feedback. This included a publicly held webinar, where participants could interact directly with Administration, as well as the option to reach out individually for clarification or input. By combining focused consultations with broad public access to information, the County aimed to create an inclusive process that considered diverse perspectives and ensured all voices were heard.

Communication Channels

A variety of communication efforts were implemented to ensure stakeholders had ample opportunity to review the information and provide feedback. Administration conducted a multi-channel approach, including direct outreach and public engagement. Over 70 developers were contacted via email, phone inquiries were addressed promptly, and two in-person presentations, along with one online webinar, were delivered to engage participants directly. The strong level of response demonstrates significant interest in these proposed Off-site bylaws.

The communication objectives were clear: to consult with interested and affected members of the public and development community while ensuring the transparent and accurate dissemination of information. This included explaining how the levy updates were developed and outlining the anticipated impacts on residents, developments, and businesses.

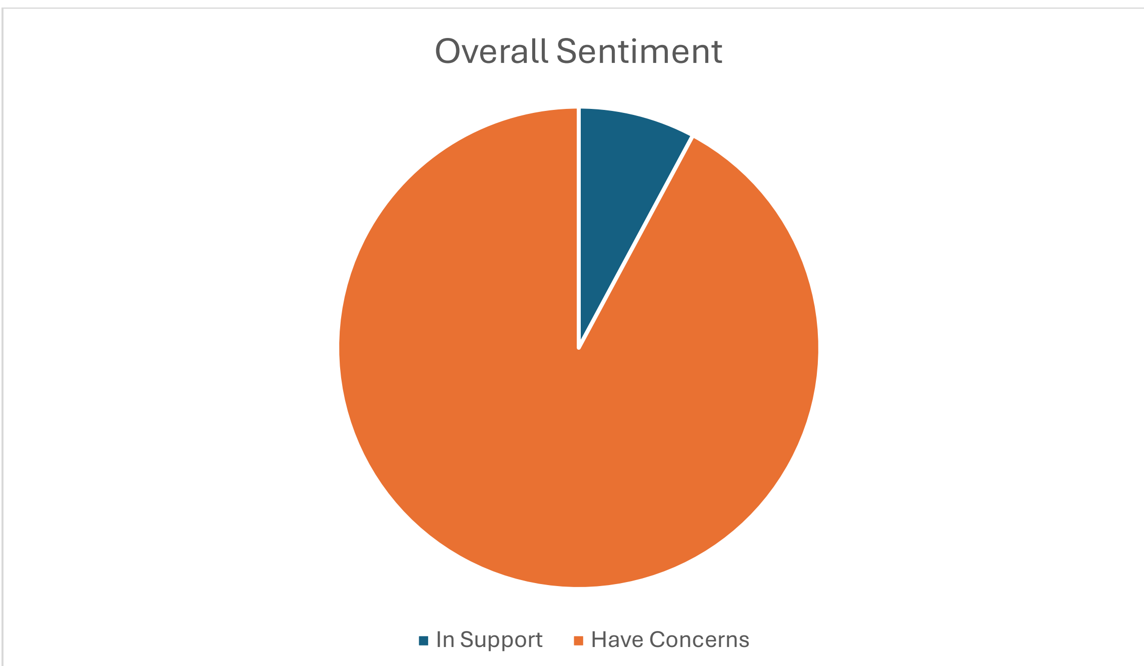
To support these objectives, Administration developed and shared fact sheets, prepared detailed presentations, and updated the County's website to include all relevant background materials, such as links to prior Council presentations. Promotion of the sessions was carried out through multiple channels, including advertisements in Rocky View Weekly newspaper, the County Connection e-newsletter, and the County's social media platforms.

Over 30 participants attended the three sessions held on October 17, 23, and 31, 2024, with many stakeholders providing additional comments via email. All feedback has been carefully compiled and analyzed to produce this What We Heard Report, ensuring stakeholder input is accurately represented.

Overall Sentiment

The stakeholder feedback reflects significant concern regarding the proposed increases to the Off-Site Levies, particularly the magnitude of the increases, the perceived lack of phased implementation, and the potential impact on project feasibility and overall investment in Rocky View County. Some stakeholders recognized that these levies help fund critical infrastructure and appreciated the County's engagement process, noting that transparency, communication, and strategic planning are essential.

However, there was significant unease regarding the sudden, substantial cost increases and their potential to undermine project feasibility. Stakeholders frequently requested a phased or delayed implementation to allow for better financial planning and to minimize the shock of immediate, large-scale rate hikes. Concerns were also raised about whether the levies align with proportional benefit principles, particularly regarding non-residential projects and the new Community Recreation Levy. In essence, while there is support for the County's long-term vision and improvements, stakeholders urge measured, incremental changes and a careful review of the calculations, timing, and scope of these proposed levies.

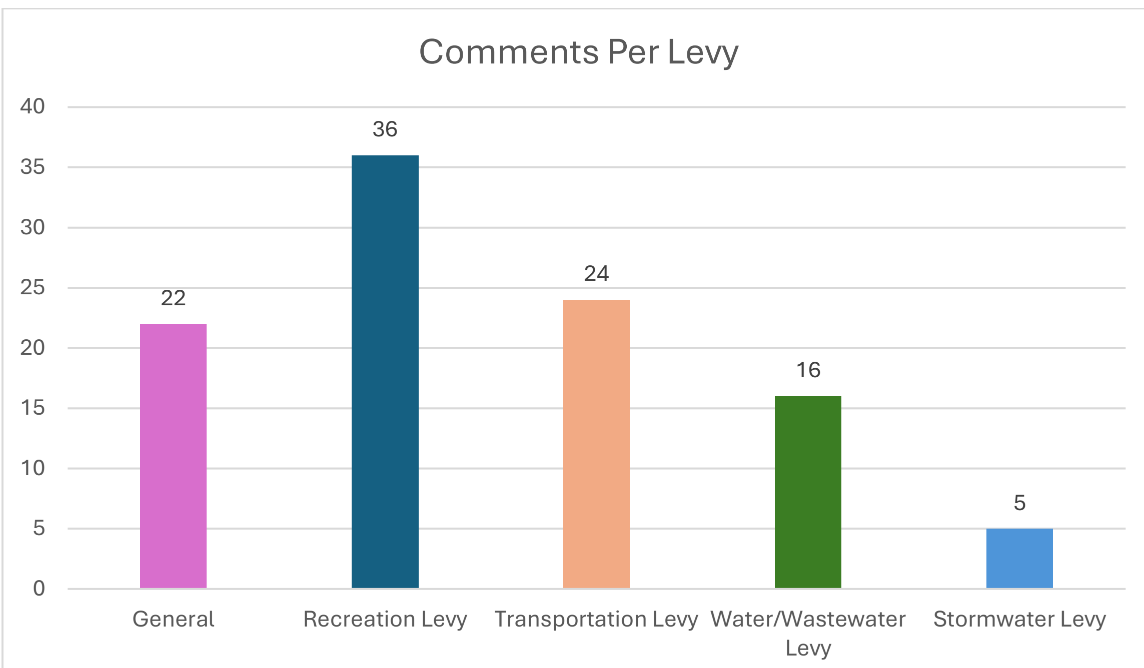


Breakdown of Comments

Out of the 103 comments received, the focus was on the newly proposed Community Recreation Levy. This heightened interest likely stemmed from its recent introduction and the desire for more clarity on its benefits, structure, and proportionality. Meanwhile, the Transportation Off-site Levy's substantial adjustments, resulting from several years without increases, also drew significant scrutiny. Stakeholders questioned the proposed changes' scope, timing, and fairness, reflecting the high stakes of transportation infrastructure for ongoing and future developments.

In contrast, Water and Wastewater levies, though still essential and frequently discussed, elicited comparatively fewer comments. The dialogue here likely centred on ensuring these utilities are sustainably funded, fairly apportioned, and reflect true proportional benefit. The Stormwater Levy received the fewest comments, suggesting either broader acceptance of the proposed changes or fewer perceived uncertainties in its methodology and application.

Finally, 22 general comments—touching on all four levies—underscore the systemic nature of stakeholder concerns. These remarks point to a shared desire for more transparency, equitable cost-distribution, and thoughtful timing.



Key Themes

The stakeholder feedback has been organized into six distinct themes, each reflecting critical considerations in how the proposed levies are perceived and understood. Among these concerns is the significant financial impact on budgets, with many respondents emphasizing how sudden and substantial cost increases could affect project feasibility. In addition, stakeholders offered a range of suggestions for improving transparency and fairness in how levy rates are calculated, often referencing practices observed in other municipalities.

Timing also emerged as a prevalent issue, with many voicing apprehension over how quickly new rates could take effect. They asked for more time to plan and adapt, questioning whether deferred implementation or phased increases might ease the transition. Localized, area-specific concerns further underscored the importance of tailoring levies to unique community circumstances. Finally, stakeholders expressed a strong desire to understand precisely how the collected funds would be used, seeking assurances that levies would produce clear and tangible infrastructure benefits.

1. *Timing*

Stakeholders emphasized the importance of aligning levy implementation with realistic development and infrastructure delivery timelines. Many expressed concerns that if new rates take effect before long-term plans are updated or before developers can adapt their project proformas, it could create financial hardships and discourage investment. Questions arose as to when levies would officially come into force, how quickly projects would benefit from the collected funds, and whether existing applications would be “grandfathered” under the old rates. Ensuring that levy implementation matches planning horizons and local economic conditions emerged as a core element of this theme.

2. *Phasing and deferring alternatives*

A recurring request was to introduce incremental rate increases or deferrals rather than imposing significant hikes all at once. By phasing new levy rates over multiple years, the County could mitigate “sticker shock” and give developers time to plan and budget accordingly. Some stakeholders suggested deferral arrangements, such as partial payments upfront and the remainder at later project milestones. This approach would provide a smoother transition, helping maintain project viability and fostering continued growth while still moving toward the County’s cost recovery objectives.

3. *Affect to budgets and increase in costs*

Stakeholders acknowledged the County’s need to recover infrastructure costs, but they voiced strong concerns about the impact these levies could have on their budgets and overall cost structures. Unexpected or steep increases could threaten project feasibility, lead to price escalations for end-users, or prompt development relocations to competing jurisdictions. From a broader perspective, some worried that high levies might slow overall growth or shift economic activity away from the County. These concerns underscored a need for balancing financial sustainability with market competitiveness and affordability.

4. *Calculation options and suggestions*

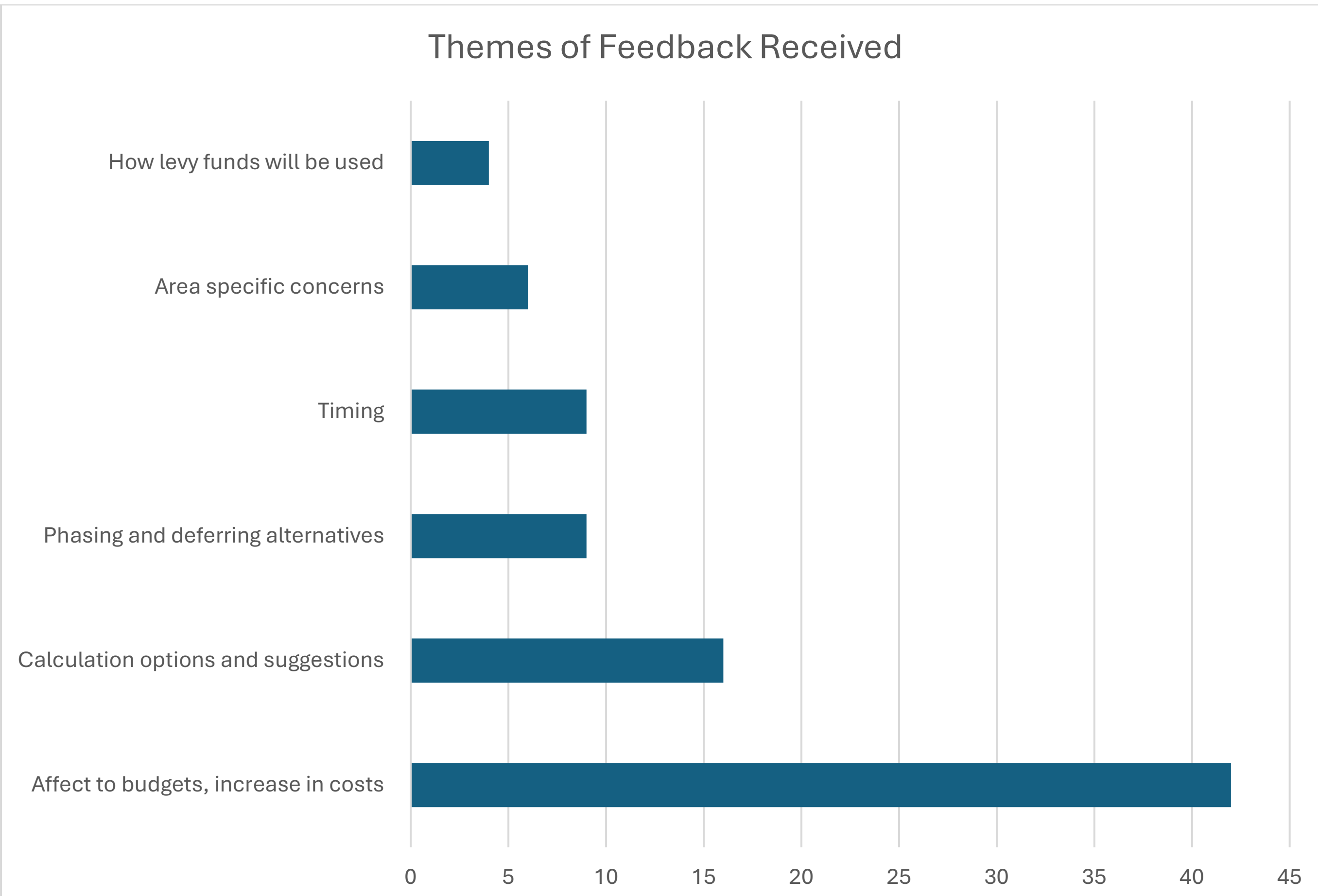
Transparency and clarity in how levies are calculated were frequently cited as essential. Stakeholders requested detailed breakdowns of project costs, growth assumptions, and anticipated infrastructure life cycles. Some suggested alternative calculation methods that account for factors like traffic generation, proximity to service infrastructure, or the actual proportion of benefit a development receives. Others recommended adopting single, universal rates or more refined, area-specific levies. These suggestions aimed to ensure that the levy formulas align with principles of fairness, proportionality, and best practices from other municipalities.

5. *Area-specific concerns*

Given the County’s geographic diversity, several stakeholders questioned why a one-size-fits-all approach should apply to communities with varying development patterns, infrastructure readiness, and service demands. Some encouraged the County to divide into zones, assigning different levy rates that better reflect local infrastructure needs and usage levels. Others highlighted potential inequities—such as developers in one region paying for infrastructure in another—and recommended geographic tailoring to ensure that those who pay levies more directly benefit from the resulting projects.

6. How levy funds will be used

A lack of clarity on precisely how collected levy funds would be allocated fueled stakeholder uncertainty. Many wanted assurances that the money would go toward delivering the promised infrastructure in a timely and transparent manner, rather than sitting idle for decades or being diverted to unrelated projects. Clarifying the relationship between levy collection, actual capital expenditures, project prioritization, and long-term maintenance responsibilities was seen as critical. Stakeholders expressed a desire for ongoing reporting and accountability measures, so that contributors could see tangible returns on their investments and trust that levies are effectively supporting sustainable growth.



The comments received highlight that while stakeholders understand the need for updated and new off-site levies, they are concerned about the practical implications of the proposed changes. Many expressed a desire for measures like phased implementation and consideration of regional differences to make the levies more workable. Ultimately, these perspectives underscore a call for a thoughtful, balanced approach that acknowledges current development realities, encourages investment and supports the County's broader infrastructure and growth objectives.

APPENDIX A: Complete List of Comments

#	QUESTION OR COMMENT	SENTIMENT
	GENERAL COMMENTS REGARDING ALL 4 LEVIES	
1	Would the County consider a phase-in period for the transportation/water/wastewater levy increases, say over a 3-year period?	Concern
2	I'm writing to express our profound concern with the initiative to amend the existing Off-site levies as well as the introduction of a new Community Recreation Off-Site Levy. As I'm sure you're aware, we have been diligently working toward regulatory approval with RVC, representing a significant change away from the former owner's regard towards achieving RVC's development goals for the area. Although our findings to date have revealed associated costs and required contingencies to far exceed our expectations, we have forged ahead being optimistic that a path forward can be found. Very recently, we learned of RVC's initiative to amend the Off-Site Levy Bylaws that increase existing rates astronomically, as well as introduce new levies that we would be required to pay. Our calculations have determined that if the proposed increases became effective, that the increase in our offsite levies alone would total approximately ***[1], in order to develop the entire site. An increase of this magnitude is simply unworkable and would negate the viability of our project and aspirations to relocate into RVC for our new facility. It's our view that if amendments to offsite levy rates are required, they be implemented in a phased manner with increases introduced over a period of years. If introduced in the current proposed manner, the implications for ourselves and others will be to halt our plans & proceed with relocating elsewhere. I might also add that it is highly likely that our project would have been in a position to be approved prior to any change in offsite levies had the delays of the realignment of *** not occurred. Working with RVC over this issue has resulted in significant delays for our development. We are deeply concerned about this issue, which will impair our ability to proceed with our investment in Rocky View County. We desire to make a meaningful contribution and impact in the community resulting from our development and ongoing use of our site. Our aim is to work constructively with RVC to address our concern.	Concern
3	We are typically pricing lease rates on our warehouse developments + 2 years out, based on proforma land development costs. It would be helpful if we are provided significant lead times on increases to the development levies so that we assume the correct costs. It would also be very helpful if these levy increases were phased in over time. This way the entire development market prices in the cost increases.	Concern
4	Overall, the proposed levies represent substantial increases to the existing rates. While we understand that costs have increased and the County is expanding servicing capacity, predictability of costs are very important for development. It takes many years to bring projects to fruition and dealing with sudden and substantial cost increases half-way through a project is problematic. In regard to the water, wastewater, and transportation levies, I request that the County considers and implements a phased approach towards the increases over a period of a few years. We are currently developing in ***and a 64% increase in transportation levies is a very large and unanticipated cost increase. Phasing levy increases over a period of years would have minimal impact on the County but will have substantial impact for active developers today and in the coming years.	Concern

1 Please note that budget numbers and project information have been removed to maintain the confidentiality of the stakeholders.

5	To this end, we submitted a Conceptual Scheme with a concurrent Land Use Amendment application and is presently working through this process with administration and local stakeholders. We are excited by our opportunity to become a corporate citizen of Rocky View and can't wait to patriate our regionally significant transportation and logistics business from Calgary to Rocky View County. To this end, we are compelled and attracted by The Rocky View Advantage! We recently became aware of the County's plans to update Rocky View's Regional Off-Site Levy Bylaws. We commend Council for preparing and implementing such strategic implementation measures to ensure sustainable growth and development continues within the County for the benefit of all existing and future Rocky View constituents. We've participated in the County's engagement processes relative to these Off-Site Levy Bylaws and attended the recent online events. We have appreciated our opportunities to participate in the various engagement processes and have taken liberty to educate ourselves accordingly. In this regard, we prepared the below-referenced estimates of the combined regional off-site levy bylaw payments in relation to our proposed Conceptual Scheme development within the '***' community. The table compares the current and proposed rates — and demonstrates how we may be required to provide the County with a substantial increase in regional off-site levy payments which is challenging the feasibility of our project.	Concern
6	PRINCIPLES OF AN OFF-SITE LEVY We understand that, in establishing an off-site levy, a municipality must consider the general principles established by the Off-Site Levy Regulation, Alberta Regulation 187/201 7, specifically Section 3 which reads as follows: Section 3: Off-Site Levy General Principles (1) Subject to section 3.1, the municipality is responsible for addressing and defining existing and future infrastructure, transportation infrastructure and facility requirements. (2) The municipality may, where necessary and practicable, coordinate infrastructure, transportation infrastructure and facilities provisions with neighbouring municipalities. (3) Notwithstanding anything to the contrary in this Regulation, the off-site levy is of no effect to the extent it directs the Government of Alberta to expend funds, to commit to funding transportation infrastructure or arrangements to undertake particular actions or to adopt particular policies or programs. (4) A municipality must not compel an applicant for a development permit or subdivision approval to fund the cost of the construction of infrastructure, transportation infrastructure or facilities to be funded by an off-site levy beyond the applicant's proportional benefit. We have reviewed the four (4) proposed regional off-site levy bylaws from the perspective of the Off-Site Levy Regulation's principles, with particular emphasis on Section 3(4) which indicates the County cannot direct an applicant to provide a proportional contribution for infrastructure investment that exceeds the proportional benefit that an applicant can reasonably expect as a return. Applying Section 4(c) of the Off-Site Regulation, we no concern with the proposed levy payments contemplated by the Water and Wastewater Off-Site Levy Bylaw (C-8548-2024) and Stormwater Off-Site Levy Bylaw (C-8547-2024) given that the regional utility servicing and stormwater drainage infrastructure capacity that this off-site levy will fund directly (and proportionally) provides benefit to our proposed development within the community. However, we have concerns with the Regional Transportation Off-Site Levy Bylaw (C-8549-2024) and the Community Recreation Off-Site Levy Bylaw (C-8S50-2024) and appreciates the opportunity to share them as described within the following sections.	Concern
7	In conclusion, we appreciate this opportunity to share our perspectives regarding the proposed updates to the County's regional off-site levy bylaws. We commend	Concern

	administration and Council for taking a leadership position with the objective of directing sustainable growth within the County. We have concerns with the proposed regional transportation and community recreation off-site levy bylaws, and based on our understanding, we believe the methodology underpinning the two may be contrary to the principles of the Off-Site Levy Regulation, specifically as it relates to directing a burden on new development that is not proportional to the anticipated benefit. For this reason, we recommend Council delay the adoption of the Regional Transportation and Community Recreation Bylaws pending further work by administration relative to their underlying assumptions.	
8	With these 4 levies, you wouldn't be paying all four. Are we paying all levies?	Information[2]
9	There have been no increases since 2020, the sticker shock is hard to swallow. We've gone 4 years without increases. Is the County's vision going forward to update levies on an annual basis?	Concern
10	What is the anticipated increase yearly?	Concern
11	The 50% increase is a big number to swallow when these companies have already invested. It seems like Council is pushing too quickly, allowing the development community zero time to find these funds. Is there a phasing out schedule for the implementation?	Concern
12	These levies have been discussed by Council over the years, sometime a Council will turn down an increase which in turn creates an issue where the costs are not being covered. Is there some way to increase every year? How can this be done annually so there is no sticker shock for developers? It has been 4 years with no increases and now developers are shocked with these rates. How do you get Council to agree to increase levies incrementally over the years?	Concern
13	Are these estimates included in the presentation?	Information
14	Logistically can deferrals be done if a project already has put in a current application? If you have a project that's in progress and the levy changes, would you pay the current instead of the new levy?	Information
15	Would a consolidation count as a subdivision?	Information
16	Building codes, these are massive changes and have huge impacts. The 2020 energy code was forecasted well in advance, anything after April 30 does not apply. Can we do something like that with these new levels? A year seems fair, then we can project funds.	Concern
17	We're now waiting on a Council date. Can these new levies be frozen for people like us?	Concern
18	Question about application of the fees to the part of a subdivision.	Information
19	A question in the chat that stated he had Council approval already for a subdivision with conditions already approved on ***.	Information
20	Just to clarify the interest/borrowing portion of the levies *** if the new levy rates come into effect on January 30th, and we pay levies for a new subdivision on the February 1st, the interest/borrowing costs will be nil ***	Information
21	Slide #66 of the Bylaw C-8007-2020 presentation (Example #7) provides an example for a 10-acre project in East Balzac. This example ignores Borrowing Costs that RVC would typically add to all levy fee calculations. By not including Borrowing Costs, the increase in new proposed levies appears very drastic. However, perhaps the proposed levy increase is not as drastic as shown in Example #7 if all debts (ie. Borrowing Costs) have been captured in the new base rates *** ("all debts have been captured in the new base rates" ie. Borrowing Costs are included in the new Base Rates, and debt starts on nil and begins to accumulate after January 30th, 2025). I've had a chance to put together an analysis to explore the relative levy rate increases if borrowing costs are included in the new Base	Concern

[2] Information requests, clarification comments, and general questions are identified via an 'I' or 'Information'.

	Rates versus borrowing costs not included in the new Base Rates. The results of this analysis are quite eye opening ***. The data I used to determine "$ per acre" and "$ per m3" Borrowing Costs was sourced from a recent Levy summary ***. If all debts have been captured in the new base rates, the increase in Transportation Levies is only 7.5%. This is significantly lower than the 57.3% increase in Transportation Levies if we simply compare the new Base Rate against the old Base Rate. The reason for this variance is that Borrowing Costs are approx. 1/3 of the current Transportation Levy charges. The new Water & Wastewater Levy also has a significant difference if Borrowing Costs have been captured in the new Base Rates versus not included, although the difference is not as drastic as for Transportation. In order for us to provide constructive and meaningful feedback to the new levy rates and the roll out of these new rates, understanding the debt component for the new Levy rates is critical to determine the extent of the negative impacts to our project proformas. We appreciate your feedback on how debt charges (Borrowing Costs) will be calculated in the new levy rates."	
22	As you can appreciate, these increases will have detrimental effects to the Development Community at large, with our proforma models now having to absorb a large *** per acre increase in levy payments. On a ¼ Section of land, this equates to *** of increased fees, with very little increased service. It was clear that Administration and Council do require these increases to provide services to the greater county area and as such, here are a few recommendations that we would suggest to RVC to employ: 1. *Delay Levy Implementation for a period of 12 months* Developers invest heavily in pre-design work before submitting applications to municipalities. For example, designing a typical industrial warehouse can take 3-6 months before submission. Developers base their decisions to apply for permits largely on project economics, of which levies are a key factor. For a 20-acre parcel, an additional $1M in costs due to levy increases could significantly impact a development's proforma. A delay would give developers time to adjust their plans accordingly. We suggest that the effective date of the levy increases does not take effect until January 1, 2026. At a minimum. 2. *Grandfather Submitted/Conditionally Approved Projects Under the Previous Levy Regime* Some developers may have conditional development permits or potential Development Agreements, but are waiting on completing other improvements, such as offsite work, or have implemented a temporary pause on their projects due to current market conditions. Grandfathering these projects would prevent developers from being financially punished by both higher levies and a slower market. Most permits have a 1–2-year lifespan, so developers cannot just keep renewing indefinitely to avoid higher levies, especially since they pay renewal fees as well. 3. *Eliminate the Community Recreation Levy for Non-Residential Developments* While the recreation levy amount is lower, the principle is that non-residential users will not directly benefit from these uses, which are geared toward residential communities. Through property taxes and the currently existing Municipal Reserve (MR) structure of land dedication or Cash-in-lieu, non-residential users already contribute to the benefit of residential users. 4. *Commitment to Additional Staffing to Improve Permit Processing Times* With the county experiencing significant growth, there has been a noticeable slowdown in processing times. While this may not be directly related to levies, higher costs should equate to improved services. Timelier processing would benefit both developers and the community, helping us continue supporting regional development.	Concern

	As a community, we understand that changes in the Bylaw structures are necessary to the continued development of Rocky View County and we do fully support the planning that has gone into East Balzac, Janet, Bearspaw, Springbank and other valued areas. We would like to ensure that increases in levies to promote services, do not subsequently hinder continued investment in those same areas. There are several Developers that are signatories to this letter and support the recommendations provided in this memorandum.	
COMMUNITY RECREATION LEVY COMMENTS		
23	Community Recreation Off-Site Levy Bylaw - While we are supportive of a recreation off-site levy in theory, we have serious concerns with the proposed bylaw as structured. *General Concerns* Council's original direction regarding a recreation off-site levy was not to move ahead with a levy, but to investigate the feasibility of doing so. Instead, Administration pushed ahead to design a recreation off-site levy.	Concern
24	There are only five other municipalities in Alberta with recreation off-site levies and all of them are urban municipalities. What evidence is there that this is a viable levy for a rural municipality? Furthermore, those municipalities all charge one flat rate, even though some of them have differential rates for other off-site levies. Why is Rocky View proposing to be the only municipality with a tiered recreation levy?	Concern
25	The County has acknowledged that the approved Recreation Master Plan, the basis for this levy, has serious flaws. Councilors raised concerns about the Plan's recommendations at the February Recreation Governance Committee meeting and directed Administration to report back on fast-tracking its replacement. Despite those concerns, the proposed recreation off-site levy is based on the Plan's recommended facility investments.	Concern
26	The September 24th council meeting discussed next steps for replacing the Recreation Master Plan to more accurately reflect recreation needs within the County. From that discussion, the status of the facilities included in the off-site levy is not clear. In response to questions, staff made the following somewhat inconsistent statements: the new plans would re-examine facility recommendations; the off-site levy could always be changed in the future if facility investment plans change; and the new community-based plans would incorporate the facility recommendations from the Master Plan. Those responses indicate that there is significant uncertainty regarding the status of the recreation facilities included in the levy. To move ahead with a levy when the County's recreation planning structure and the status of the facilities included in the levy are in flux makes no sense.	Concern
27	A comparable reality was the reason council paused the fire services off-site levy. The same should be done for the recreation off-site levy. At a minimum, a recreation off-site levy should only move forward with a single county-wide rate structure.	Concern
28	*Specific Concerns* *Catchment area for area-specific levy rates* Administration indicated that the catchment areas for the proposed area-specific recreation off-site levies are based on the "established principle" of a 20-minute driving radius to access recreation facilities. We support this principle; however, the Recreation Master Plan did not use this principle in identifying recreation facility investments. If it had, it could not have recommended full-scale recreation facilities in both Springbank and Harmony which are significantly less than a 20-minute drive from each other and from comparable recreation facilities within Calgary and Cochrane.	Concern
29	Responsible decision-making regarding recreation spending should assess the trade-offs between investing County resources in bricks and mortar facilities within the County versus contributing to recreation facilities in the neighbouring municipalities that are	Concern

	within the 20-minute driving threshold of county residents. To the best of our knowledge, such an assessment has not been done.	
30	*Magnitude of anticipated recreation investments* We are also concerned with the magnitude of recreational investments included in the levy structure. Residents were never asked if they were willing to have their property taxes increase to pay for facilities. They were only asked what facilities they'd like in their community. As a result, we believe that the existing Recreation Master Plan is based on a "wants" assessment rather than a "needs" assessment.	Concern
31	The recreation off-site levy is only expected to collect 51% of the capital costs of the proposed facilities from new development anticipated to occur over the next 20 years – \$69 million of the \$134 million for the facilities included in the levy. What happens if development does not materialize as anticipated?	Concern
32	Ongoing operating and maintenance costs will be borne by ratepayers, not by new development. This is never mentioned. Ratepayers are being asked not only to pay a significant fraction of the capital costs, but also all the ongoing costs, the magnitude of which is not part of this discussion.	Concern
33	The levy structure assumes that development beyond 20 years will pay a share of recreation facility costs through future levies. How has that development has been estimated? Growth rates beyond 20 years are notoriously uncertain. If long-range development is based on full-build out of ASPs, it has unavoidable inaccuracies that have not been acknowledged. Full build out statistics in ASPs assume that every acre will be developed, beyond what is needed for roads, utility corridors, and municipal reserves. This overstates development potential since it does not reflect environmental constraints and fails to recognize that not every landowner wants to subdivide their land. Even if long-range future development materializes as anticipated in the levy structure, the recreation facilities will have to be paid for by current or near-term future ratepayers through property taxes (to at least cover debt carrying costs). By the time long-range future development occurs, the facilities may be nearing the end of their useful lives.	Concern
34	I attended the offsite levy bylaw information session last week and have a question to submit to the team for consideration regarding the Community Recreation Off-Site Levy Bylaw: We would request that consideration be given to including a defined "development area" that the levy would apply to rather than the levy applying to an entire parcel. This would be similar to the provision in the current Transportation Offsite Levy Bylaw. We make this request because there may be instances where a development permit for a small, private development is required on a large parcel, and as the Bylaw is currently written, the potential remains for a very large levy when only a small area is being developed that has little impact on County infrastructure and services. For example, an oversized accessory building requiring a DP on a large agricultural parcel could be subject to a substantial levy if the base levy is applied to the entire acreage.	Concern
35	Community Recreation Facilities Levy: We understand the reason for the introduction of this new levy. Providing opportunities to offset payment of the recreation levy through provision of qualifying recreational installations as part of new development would be worth consideration, especially for areas that are far removed from planned recreation centre locations.	Concern
36	CONCERNS WITH THE COMMUNITY RECREATION OFF-SITE LEW BYLAW Applying Section 4(c) of the Off-Site Regulation, *** has reviewed the proposed Regional Community Recreation Off-Site Levy Bylaw and offers the following four (4) concerns.	Concern

	CONCERN #1: PROPORTIONALITY *** does not understand why the proposed regional community recreation off-site levy bylaw makes a distinction between new development and existing ratepayers as it relates to the contribution of funding for future upgrades to the County's recreation infrastructure. Based on our understanding of the various schedules attached to the proposed Off-Site Levy Bylaw, we understand that: • Within the Eastern catchment area, new development will contribute 80% of the costs for future community recreation infrastructure specific to the catchment, and existing ratepayers will contribute 20% of the costs for future community recreation infrastructure specific to the catchment. • Within the Western catchment area, new development will contribute approximately 70% of the costs for future community recreation infrastructure specific to the catchment, and existing ratepayers will contribute about 30% of the costs for future community recreation infrastructure specific to the catchment. • Within the entire County, new development will contribute approximately 70% of the costs for future community recreation infrastructure County-wide, and existing ratepayers will contribute about 30% of the costs for future community recreation infrastructure County- wide. Given the proposed Off-Site Levy Bylaw is including the total $89M of investment required from developers to fund the entire community recreation infrastructure network to its ultimate anticipated capacity, why are new developers and existing ratepayers treated differently? *** believes it would be fairer to consider new development and existing ratepayers proportionally the same when it comes to the need to fund future community recreation infrastructure? *** believes the arbitrary distinction between new development and existing ratepayers may be creating disproportionate expectations for funding the future community recreation upgrades when considering the principles in Section 3 of the Off-Site Levy Regulation.	
37	CONCERNS WITH THE COMMUNITY RECREATION OFF-SITE LEW BYLAW Applying Section 4(c) of the Off-Site Regulation, *** has reviewed the proposed Regional Community Recreation Off-Site Levy Bylaw and offers the following four (4) concerns. CONCERN #2: UNDERLYING GROWTH ASSUMPTIONS *** assumes that the geographic extent of future upgrades to the community recreation infrastructure network are based on the County's underlying growth management assumptions contemplated by the 2013 Municipal Development Plan (County Plan). *** notes that the County is preparing a new Municipal Development Plan (MDP) that is anticipated to be before Council at a public hearing some time in 2025. *** further notes that since the County Plan was adopted in 2013, the province mandated regional planning within the Calgary Region under the auspices of the Calgary Metropolitan Region Board (CMRB). Subsequently, the CMRB adopted a Regional Growth Plan (RGP) in 2022 which dramatically alters expectations for future rural development in the County. Alternatively, the CMRB RGP contemplates an urban form of development within determined Joint Planning Areas — in accordance with Regional Context Studies and subsequent Area Structure Plan (ASP) reviews/updates. As such, *** is concerned that the total anticipated infrastructure costs contemplated by this proposed Regional Community Recreation Off-Site Levy are based on 'out-dated' development assumptions that are over a decade old which do not reflect the current (and evolving) growth management expectations within the County and the Region. For this reason, *** is concerned that the corresponding per ha (per ac) levy rates to be	Concern

	charged by this proposed bylaw may be substantially over-estimating (or under-estimating) the amount of growth expected within the County. *** recommends that implementation of the Regional Community Recreation Off-Site Levy Bylaw be delayed until after the County (and CMRB) approve the new Municipal Development Plan (MDP) and Regional Context Studies. This will allow the County to update the off-site levy bylaw's underlying growth assumptions and corresponding recreation demand modelling.	
38	CONCERNS WITH THE COMMUNITY RECREATION OFF-SITE LEW BYLAW Applying Section 4(c) of the Off-Site Regulation, *** has reviewed the proposed Regional Community Recreation Off-Site Levy Bylaw and offers the following four (4) concerns. CONCERN #3: FUNDING SOURCES *** understands that municipal community recreation infrastructure is often funded by grants from the Provincial government. Based on our review of the proposed Community recreation off-site levy bylaw, it appears that investment required for future community recreation infrastructure is to be funded entirely by new development and existing ratepayers. *** recommends that the Regional Community Recreation Off-Site Levy Bylaw calculations should be revised to assume a proportional investment from the Province for future infrastructure.	Concern
39	When will this be initiated?	Information
40	Would the Community Recreation Levy apply to any Land Use type?	Information
41	Without this levy, how is this currently funded? Is this not a double dip?	Information
42	Why are there not more options, last year there was 4 options. Why was a special rate and catchment option not chosen?	Concern
43	How does Calgary do it?	Information
44	If you’re in east Balzac, miles from the west and paying for base when you won’t even use that facility at all. Those developers will see very little benefit. Impact on developers is greater.	Concern
45	Those in industrial areas should not have to pay, seems like double dip.	Concern
46	This 2:1 ratio, is this a ’feels right’ number or based on a study?	Information
47	Are the levies only for capital?	Information
48	Will you have a levy for operational cost?	Information
49	The timing of collection of levies vs building facilities and development times. Does this assume the County would take out debt to build the facilities and then repay themselves using levies?	Information
50	Recreation cost sharing; is one coming with Calgary?	Information
51	As someone who is an industrial contributor, it’s easier to understand when it comes to operations then when it comes to recreation. It helps if you’re building a residential community, but industrial areas are limited-service areas. Not same return on money for developers. Businesses are not using rec centres/amenities. People who work in Balzac generally live in Airdrie or Calgary and these are not RVC residents using RVC facilities.	Concern
52	Are there thoughts of other recreational facilities in the future?	Information
53	If another recreation project comes along in 5 years would the levy increase?	Information
54	Council has said they need to revisit the rec master plan. What happens to the money collected if/when plans change?	Concern
55	If no Conrich facility was built, could the money be used for some new unidentified build?	Information
56	One is about the recreation levy and at what stage is it applied? Is it subdivision only or would some development permits be eligible as well?	Information
57	Hi yes, I am wondering about the recreation levy particularly and I'm sorry I haven't read through the materials yet, but is there a possibility to apply the levy to only a specific	Information

	development area? For example, if you have, you know a 40-acre parcel, but you're developing a Small area of it. Does the levy apply to the entire 40 acres, or would it be to a development area?	
58	There was another question respect to development area. The example given, if you have a 40-acre parcel and you're only doing business or uses for maybe 10 acres of that. Would you then, with the levies specifically for the recreation levy, would it be applied to the 40 acres or just 10 acres?	Information
STORMWATER LEVY COMMENTS		
59	Regional Stormwater Off-Site Levy Bylaw - We are encouraged to see that the proposed revisions to the stormwater off-site levy include levies to pay for necessary infrastructure within the areas that will be serviced by the CSMI system. It never made sense that the existing stormwater off-site levy collected funds to pay for the regional conveyance system without recognizing that stormwater had to get to that regional conveyance system. Langdon, Janet and Conrich area-specific levies are an essential element for viable stormwater management in east RVC. Continuing to permit development without effectively managing stormwater is not sustainable from either an environmental or a long-term financial perspective. Although the stormwater levies may now be higher in these areas than stormwater levies in neighbouring municipalities, the total off-site levies paid in these areas remain significantly lower than the totals paid in the other municipalities. As a result, the impact on regional competitiveness still favours development in Rocky View.	Support
60	Stormwater Levy: No comments or concerns.	Support
61	What improvements in infrastructure are going to occur? What are we getting for this increase?	Information
62	Better service, more connection to that service therefore levies are going up? Is this what is currently happening or is this to serve a future plan?	Information
63	When the storm water levies were updated back in 2020, staff had brought forward the two-tiered regional and local connectivity. Has this not gone forward under the previous Council?	Information
TRANSPORTATION LEVY COMMENTS		
64	The budget for transportation capital projects is at $1.85 Billion, are all of the projects included in that number expected to be constructed within the next 25-30 years?	Information
65	How was the new base levy split determined between rural and rurban? Rurban is a new term to me, and this delineation appears to only be used for the transportation levy. The transportation base levy for rural goes up by 35% to $6199/ac and the base levy for rurban goes up 278% to $17,394/ac.	Information
66	It seems most equitable to have the same base rate applied equally to all land, as it is with the new recreation levy. This would be a new transportation base levy at $10,912/ac, which still represents a substantial increase from the current rate.	Concern
67	Is there a public document available that goes into more detail or breakdown of projects included on the attached Map A?	Information
68	Given the size and diversity of the County a further breakdown in zones for transportation levy could be another way of looking at it. In regard to our current development project *** would see no benefit from most of the projects shown on the map included in the base levy. Although we would produce a higher traffic count per acre than 5 acre+ sized subdivisions, those counts are being added to very few locations immediately adjacent to major corridors. In other large municipalities we see transportation levies broken down by region on a much smaller scale for transportation projects, often with levy rates being assigned to individual quarter sections at different rates depending on proximity to	Concern

	existing infrastructure, future network improvements and timing. Below snapshot is an example of transportation levies in Parkland County. There are probably good reasons that Rocky View's levies haven't been done in this way, but it seems more equitable in regards to actual benefit and actual cost.	
69	Transportation Off-Site Levy Bylaw - We support the proposed changes to the Transportation Off-Site Levy (TOL) Bylaw. From the residents' perspective, a more equitable levy structure would base the levy charged for residential development on the number of new dwellings created rather than on the acreage involved. However, we recognize that Administration sees significant difficulties in implementing this alternative. The proposed two-tiered TOL (rural / rurban rates) acknowledges the greater infrastructure demands from higher density residential development and commercial development while maintaining greater structural and administrative simplicity relative to a per-dwelling rate structure. As a result, we strongly support this change. In terms of which types of development pay the rural versus the rurban rate, aggregate resource development should pay the higher rate as do all other commercial developments. Gravel pits are not temporary in terms of any meaningful planning horizon, and their end use is uncertain. They involve significant heavy truck traffic whose demands on the road network are comparable to, if not greater than, other commercial operations. They are not comparable to those from lower density residential or agricultural development. Incorporating the costs for bridges along the road networks that are part of the TOL is also a solid step forward. Bridges are an essential component of the transportation network, and their costs should be covered by the TOLs. The information indicates that there may be consideration for phasing the TOL rate increases. We believe the revised rates should be fully implemented immediately, not over time. Existing County stakeholders, both residential and business, have subsidized new development's share of transportation infrastructure costs for too long. There is no rationale for extending that subsidization. Impacted developers may complain, but as is obvious from staff's presentation, the levy costs associated with development in Rocky View will remain significantly lower than those of any neighbouring municipality.	Support
70	Transportation Levy: The increase in transportation levy is substantial. The methodology used takes all projects which may be built over a very long period and levies a potential cost for those projects over all land. This method doesn't provide a timeline for those improvements and there is no correlation conveyed in the base levy between the funds collected and the projects built. Essentially this means that levies collected in the 2020's could be held for 80 years until some of the last projects are completed on Map A – and those projects may be far away from the land that originally paid those levies. The County's size and geography also don't lend well to a broad base levy as has been proposed. $1.856 Billion is an eye-popping number for a rural Alberta municipality to contemplate spending on transportation infrastructure and some further detailed consideration on the projects included and the benefitting areas would be merited. It seems unnecessary to include projects in the transportation levy that are, by any reasonable assessment, far outside of a reasonable development horizon.	Concern
71	CONCERNS WITH THE REGIONAL TRANSPORTATION OFF-SITE LEVY BYLAW Applying Section 4(c) of the Off-Site Regulation, *** has reviewed the proposed Regional Transportation Off-Site Levy Bylaw and offers the following three (3) concerns. CONCERN #1: PROPORTIONALITY *** does not understand why the proposed regional transportation off-site levy makes a distinction between 'rurban' and 'rural' development forms as it relates to the contribution of funding for future upgrades to the County's long range transportation	Concern

	network. Based on our understanding of the various schedules attached to the proposed Off-Site Levy Bylaw, we understand that: • Rurban landowners/developers will contribute 75% of the costs for future long range transportation network upgrades; and • Rural landowners/developers will contribute 25% of the costs for future long range transportation network upgrades. Given the proposed Off-Site Levy Bylaw is including the total $946,841,237 of infrastructure investment required from developers to fund the future long range transportation network to its ultimate anticipated capacity, why are rural and rurban developers treated differently? *** believes it would be fairer to consider these two types of developers proportionally the same when it comes to the need for future infrastructure. On what basis is the 75/25 split determined and why? Does geographical location within the County and/or the type of new development play a factor in this7 Acknowledging the *rurban' definition included in Schedule 'A', *** believes the arbitrary distinction between rural and rurban developers may be creating disproportionate expectations for funding the long-range transportation network upgrades when considering the principles in Section 3 of the Off-Site Levy Regulation.	
72	CONCERNS WITH THE REGIONAL TRANSPORTATION OFF-SITE LEVY BYLAW Applying Section 4(c) of the Off-Site Regulation, *** has reviewed the proposed Regional Transportation Off-Site Levy Bylaw and offers the following three (3) concerns. CONCERN #2: GEOGRAPHIC LOCATION Map 'A' of the Regional Transportation Off-Site Levy identifies the specific location of all segments of the long-range transportation network that are proposed to be upgraded in support of anticipated growth within the County. Schedules 'B1' and 'B2' delineate the specific type of roadway cross-section and associated upgrade costs for each segment. *** acknowledges that areas benefitting from the expanded long range regional transportation infrastructure network include all lands that are expected to be developed within the County and correspondingly contribute increased traffic onto the long-range network. To this end, *** appreciates that the costs associated with 'background regional traffic' have been removed from the 'developer' funded portion of the upgrade costs. However, *** does not understand how the Off-site Levy Bylaw's methodology has considered the physical location of proposed development within the County. For example, why should a developer pursuing a subdivision within the Cochrane Lake community need to contribute infrastructure investment to fund future upgrades to infrastructure in Langdon, and/or vice versa? *** recommends the Regional Transportation Off-Site Levy be established based on the expected traffic generation and distribution that is connected directly to a specific location of development (i.e. ASPs)? Does the Off-Site Levy make any distinction between the specific type of development (i.e., residential, commercial, and industrial) and the amount and type of associated traffic it generates?	Concern
73	CONCERNS WITH THE REGIONAL TRANSPORTATION OFF-SITE LEVY BYLAW Applying Section 4(c) of the Off-Site Regulation, *** has reviewed the proposed Regional Transportation Off-Site Levy Bylaw and offers the following three (3) concerns. CONCERN #3: UNDERLYING GROWTH ASSUMPTIONS *** assumes that the geographic extent of future upgrades to the long-range transportation network as illustrated on Map *A' of the Regional Transportation Off-Site Levy are based on the County's underlying growth management assumptions contemplated by the 2013 Municipal Development Plan (County Plan). *** notes that the County is preparing a new Municipal Development Plan (MDP) that is anticipated to be before Council at a public hearing some time in 2025.	Concern

	*** further notes that since the County Plan was adopted in 2013, the province mandated regional planning within the Calgary Region under the auspices of the Calgary Metropolitan Region Board (CMRB). Subsequently, the CMRB adopted a Regional Growth Plan (RGP) in 2022 which dramatically alters expectations for future rural development in the County. Alternatively, the CMRB RGP contemplates an urban form of development within determined Joint Planning Areas — in accordance with Regional Context Studies and subsequent Area Structure Plan (ASP) reviews/updates. As such, *** is concerned that the total anticipated infrastructure costs contemplated by this proposed Regional Transportation Off-Site Levy are based on 'out-dated' development assumptions that are over a decade old which do not reflect the current (and evolving) growth management expectations within the County and the Region. For this reason, *** is concerned that the corresponding per ha (per ac) levy rates to be charged by this proposed bylaw may be substantially over-estimating (or under-estimating) the amount of growth expected within the County. *** recommends that implementation of the Regional Transportation Off-Site Levy Bylaw be delayed until after the County (and CMRB) approve the new Municipal Development Plan (MDP) and Regional Context Studies. This will allow the County to update the off-site levy bylaw's underlying growth assumptions and corresponding traffic generation modelling.	
74	Why is Springbank [cost's] down?	Information
75	What would be the timing if this is implemented?	Information
76	Can you explain how council voted to freeze numbers in 2020. If the money was frozen, where did the money come from? Tax dollars?	Information
77	So, ultimately it would never touch taxpayer dollars, it would touch the levy reserve?	Information
78	Do you have feedback from when Council voted to freeze fees, what their reasoning was to freeze those fees? Was it make our region more attractive for development?	Information
79	In terms of payment, is the transportation levy payment like the other 3 levies?	Information
80	How comparable are the rates compared to the surrounding markets?	Information
81	Why did you choose Strathcona county for other county benchmarking?	Information
82	Why not special levies for special areas, like bridges?	Concern
83	Why is the gravel industry is treated differently and has a lower rate?	Information
84	Do these transportation levies include underground infrastructure?	Information
85	Why was the schedule F, special area 4 construction land for purchase of RR34 fly over 100% paid by Rocky View?	Information
86	Why not put the fly over at RR40?	Information
87	Given that the levies are paid at subdivision, Springbank is the only community that benefits. What about Harmony? This subdivision is not paying for what they're benefiting from.	Concern
WATER/WASTEWATER LEVY COMMENTS		
88	Given that the levies are paid at subdivision, Springbank is the only community that benefits. What about Harmony? This subdivision is not paying for what they're benefiting from.	Concern
89	Regional Water and Wastewater Off-Site Levy Bylaw - Our previous concerns regarding whether the water/wastewater levies will effectively recover the County's debt incurred to construct the existing and future infrastructure remain unchanged. That said, we have not had the opportunity to determine if the proposed new levy rates improve debt recovery. The County fronted the costs to extend servicing to East Balzac, so expanding the water/wastewater levies to apply to development there makes sense.	Support
90	Is there a way to secure a 50% deferral rate for our wastewater/water levies?	Concern
91	Will borrowing costs be reset to zero, or will they be included in the new rate?	Information

92	Water and Wastewater Levy: These levies are divided into separate components but some of the same feedback applies to each point, corresponding project numbers from the proposed levies are referenced below. Project D6, the major upgrades to the water treatment plant appears to be the primary driver for revisiting the existing levy rates under this bylaw. D1 and D2: The projects summarized that there is no measurable benefit to existing development but the project descriptions include doubling the amount of pumps at each lift station and major capital improvements to the waste water treatment plant. The improvements listed for both D1 and D2 would be providing redundancy and resiliency for a large period of time, up until the maximum theoretical capacity is reached. This appears to be a benefit to the County and to existing development. D7a, D7b, D8, D9a, D9b: There are no upgrades proposed under these Schedules. Each project references the increased system capacity up to 8000 cubic meters and provision of water to existing developed areas but offers no detailed description on why the existing levy rate can't be retained and the recoverable amount reduced instead. It appears that the recoverable amount is being increased to align with an increase in theoretical capacity which for these projects, already exists and is already covered by the existing bylaw levy rates. D11: This project notes that there is zero capital cost or recoverable cost incurred to date, but that 3808 cubic meters of capacity has been committed and $2.7M of levies have been collected against this future project, or $708/m3 to date. This levy is proposing a cost of $4821/m3 and the actual capital project cost per volume is $2864/m3. The project summary notes that no benefit to existing development will be provided – but also that development levies have been collected from existing development land and capacity has been assigned to existing development. There seem to be a few items that are incongruent regarding Schedule D11. The levies do not account for any benefit to developed land, though installing a backup loop and additional capacity adds resiliency to the overall system. This benefit is shared by future development lands, existing developed lands, and the County.	Concern
93	Has there been any consideration or discussion with the city of Calgary to have regional infrastructure?	Information
94	Is there a grant that offset the cost of provincial funding? Was that a unique opportunity to apply for those grants or are there more available to the county?	Information
95	Are there updated maps for new areas? Are there updated boundaries for other areas?	Information
96	Do you know the amount of servicing today (water Langdon)? Is it being upgraded?	Information
97	Are improvements to get this up to 8000 per day something in the horizon?	Information
98	On the water side, is there a list of projects that fall under the potable water levy?	Information
99	Are new projects undertaken by the County or the developer?	Information
100	Is Council on board with first reading? With the first rates you've provided to them?	Information
101	A lot of us have projects with you, completed in the last year or two. Are we able to get from staff what the current rates are vs the new rates for comparison?	Information
102	Are you worried about run-on subdivisions?	Information
103	Given the proposal, and no changes to it; What is a conceivable date for Council's approval and it becoming effective? Considering approval dates of land use amendments and subdivisions. What is the rate before/after approval?	Information