



November 20, 2024

Rocky View County

Planning, Development & Engineering Staff

262075 Rocky View Point

Rocky View County, Alberta, T4A 0X2

Attention: Jeannette Lee

**REF:** Rocky View Bylaw Levy Amendments & Additions

RE: Development Community – Levy Feedback and Recommendations

Dear Jeannette,

Firstly, thank you to Rocky View County (RVC) for hosting the various work sessions with the Development Community during the month of October. They were informative and provided greater clarity around the rationale for the Bylaw Levy Amendments and Recreation Levy addition.

Administration was tasked with garnering feedback from the Development Community. During the information session that Hopewell and Beedie attended on October 31<sup>st</sup>, it was requested that feedback be provided to RVC with respect to the implementation and timing of the Bylaw Levy amendments.

RVC Council and Administration have presently approved first reading for Bylaw C-8547-2024, C-8548-2024 and C-8549-2024. These Bylaws would amend the Regional Stormwater Offsite Levy Bylaw C-8008-2020, Regional Water & Wastewater Offsite Levy Bylaw C-8009-2020 and Regional Transportation Off-Site Bylaw C-8007-2020 respectively.

RVC Council and Administration further approved first reading for the Community Recreation Off-Site Bylaw C-8550-2024.

The Transportation Rural Base levy rate is being unfrozen from \$4,495.00 per acre and increased to \$14,268.00 per acre. East Balzac Special area rates increase from \$17,200.00 per acre to \$20,014.00 per acre. The increase as explained during the information session, was to align with inflation and having frozen the rate for the past 4 years.

The Water & Wastewater rate is increasing from \$31,837.00 per m<sup>3</sup>/per day/per acre to \$37,507.00 per m<sup>3</sup>/per day/per acre. The increase as explained during the information session, was to align with inflation and having frozen the rate for the past 4 years.

The Community Recreation rate will be \$1,162.00 per acre for the base County wide rate and further catchment rates apply to specific areas.



The increases equate to \$19,419.00 per acre (approx.) in the East Balzac area.

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 \$19,419 per acre increase in levy payments. On a ¼ Section of land, this equates to \$3.1m 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.



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.

Best Regards,

**Hopewell Development LP**

**DEREK FOX**

VICE PRESIDENT, CONSTRUCTION

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<b>cc.</b>	<b>David Forbes</b>	-	<b>Principal – Enright Capital Ltd</b>
	<b>Jorden Dawson</b>	-	<b>Vice President – Beedie Industrial Development</b>
	<b>Geoff Macmillan</b>	-	<b>Director, Development – Anthem Properties</b>
	<b>Miguel Martinez</b>	-	<b>Director, Development, Prairie Regions - Quadreal</b>



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262075 Rocky View Point  
Rocky View County, AB T4A 0X2**Re: Proposed Regional Off-Site Levy Bylaw Updates**

- Regional Transportation Off-Site Levy Bylaw C-8549-2024
- Community Recreation Off-Site Levy Bylaw C-8550-2024
- Regional Water and Wastewater Off-Site Levy Bylaw C-8548-2024
- Regional Stormwater Off-Site Levy Bylaw C-8547-2024

Attn: [Engineering@rockyview.ca](mailto:Engineering@rockyview.ca); [LegislativeServices@rockyview.ca](mailto:LegislativeServices@rockyview.ca)

Dear Reeve and Council,

Overland Container Transportation Services (OCTS) is a transportation services provider operating in association with CN and CP/KC rail terminals located within both the Calgary and Edmonton metropolitan areas. OCTS's operations provides our customers with reliable and efficient railway logistics, transportation, and storage services across Western Canada, the Yukon, and Northwest Territories. OCTS is one of the largest container drayage providers in Alberta, and we are proud to be the "last mile" for prominent global steamship lines and freight companies.

OCTS presently employs \_\_\_ people operating out of five (5) locations with the City of Calgary's Foothills Industrial Park. Given the continued urbanization occurring within the southeast portion of the city, OCTS's operations are being challenged by increased traffic congestion. As such, OCTS has purchased ±64 ha (±160 ac) within Rocky View County's Conrich community, directly adjacent to CN's Calgary Logistics Park. OCTS intends to strategically re-locate its entire base of operations from the Foothills Industrial Park to the Conrich Regional Business Centre to strategically capitalize on the area's efficient connections with regional transportation infrastructure. To this end, OCTS has 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!*

OCTS 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. OCTS has 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, OCTS has prepared the below-referenced estimates of the combined regional off-site levy bylaw payments in relation to our proposed Conceptual Scheme development within the Conrich community. The table compares the current and proposed rates – and demonstrates how OCTS 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.

### Overland Container Transportation Services - Overland Open Park Conceptual Scheme Estimated Off-Site Levy Payment Comparison

#### CURRENT RATES

Net Developable	Transportation Off-Site Levy		Stormwater Off-Site Levy		Water Off-Site Levy	Wastewater Off-Site Levy	Community Recreation Off-Site Levy	TOTAL
60.4 ha	Base Levy @ \$11,354 / ha	Special Area #2 Levy @ \$12,869 / ha	Base Levy @ \$14,807 / ha		Assumed 316 m <sup>3</sup> /day water demand		N/A	
	\$685,781.60	\$777,287.60	\$894,342.80		\$4,231,887.00	\$3,885,071.00	\$0.00	\$10,474,370.00

#### PROPOSED RATES

Net Developable	Transportation Off-Site Levy		Stormwater Off-Site Levy		Water Off-Site Levy	Wastewater Off-Site Levy	Community Recreation Off-Site Levy		TOTAL
60.4 ha	Rurban Levy @ \$42,981 / ha	Special Area #2 Levy @ \$18,980 / ha	CSMI Area Levy @ \$20,592 / ha	Conrich Benefitting Area Levy @ \$6,381 / ha	Assumed 316 m <sup>3</sup> /day water demand		Base Levy @ \$2,871 / ha	Eastern Levy @ \$15,014 / ha	
	\$2,596,052.40	\$1,146,392.00	\$1,243,756.80	\$385,412.40	\$5,825,024.00	\$4,089,641.00	\$173,408.40	\$906,845.60	\$16,366,532.60

#### Notes

1. OCTS's estimate for Water & Wastewater Off-Site Levy assumes 20,000 m<sup>2</sup> of commercial buildings, 9.3 ha of future industrial subdivision, water demand of 2.43 m<sup>3</sup>/day for the Phase 1 logistics centre, and 170 future multi-family dwelling units

## PRINCIPLES OF AN OFF-SITE LEVY

OCTS understands that, in establishing an off-site levy, a municipality must consider the general principles established by the *Off-Site Levy Regulation, Alberta Regulation 187/2017*, 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.

OCTS has 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*, OCTS has **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 industrial development within the Conrich Community.

However, OCTS **has concerns** with the Regional Transportation Off-Site Levy Bylaw (C-8549-2024) and the Community Recreation Off-Site Levy Bylaw (C-8550-2024) and appreciates the opportunity to share them as described within the following sections.

### **CONCERNS WITH THE REGIONAL TRANSPORTATION OFF-SITE LEVY BYLAW**

Applying Section 4(c) of the *Off-Site Regulation*, OCTS has reviewed the proposed Regional Transportation Off-Site Levy Bylaw and offers the following three (3) concerns.

#### **CONCERN #1: PROPORTIONALITY**

OCTS 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 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?

**OCTS 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 this? Acknowledging the 'rurban' definition included in Schedule 'A', OCTS 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*.

### **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.

OCTS 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, OCTS appreciates that the costs associated with 'background regional traffic' have been removed from the 'developer' funded portion of the upgrade costs.

However, OCTS 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?

**OCTS 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 #3: UNDERLYING GROWTH ASSUMPTIONS**

OCTS 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).

OCTS 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.

OCTS 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, OCTS 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, OCTS 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.

**OCTS 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.**

### **CONCERNS WITH THE COMMUNITY RECREATION OFF-SITE LEVY BYLAW**

Applying Section 4(c) of the *Off-Site Regulation*, OCTS has reviewed the proposed Regional Community Recreation Off-Site Levy Bylaw and offers the following four (4) concerns.

#### **CONCERN #1: PROPORTIONALITY**

OCTS 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?

**OCTS 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? OCTS 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*.

### **CONCERN #2: UNDERLYING GROWTH ASSUMPTIONS**

OCTS 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).

OCTS 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.

OCTS 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, OCTS 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, OCTS 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.

**OCTS 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.**

### **CONCERN #3: FUNDING SOURCES**

OCTS 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.

**OCTS 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.**

In conclusion, OCTS appreciates this opportunity to share our perspectives regarding the proposed updates to the County's regional off-site levy bylaws. We commend administration and Council for taking a leadership position with the objective of directing sustainable growth within the County. OCTS has 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.

Respectfully,



Joe Tompalski

President, Overland Container Transportation Services (OCTS)

November 14<sup>th</sup>, 2024

Capital and Engineering Services  
262075 Rocky View Point  
Rocky View County, AB T4A 0X2  
Edmonton, AB T6X 0A9

**RE: Offsite Levy Bylaw Feedback – Rocky View County, AB**

This letter is provided in accordance with the ongoing consultation process regarding changes to Rocky View County's Offsite Levy Bylaws. Camgill Development Corporation is an active developer in Rocky View County and is impacted by changes to the offsite levy bylaw. We commend the County on the clarity of the documents, maps and presentations that have been made available explaining the changes and impact to each development area under the proposed bylaw.

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 East Balzac 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.

**Stormwater Levy:**

No comments or concerns.

**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.

**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/m<sup>3</sup> to date. This levy is proposing a cost of \$4821/m<sup>3</sup> and the actual capital project cost per volume is \$2864/m<sup>3</sup>. 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.

#### 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.

Thank you for the opportunity to contribute to the offsite levy bylaw.

Regards,

Camgill Development Corporation

Will Adam, P.Eng., PMP  
Development Manager  
Camgill Development Corporation



**Bylaw C-8549-2024**

**Schedule 'B-1' – Long Range Regional Transportation Infrastructure Network –  
Rurban Base Levy**

**Description:**

Rocky View County’s existing regional road network requires expansion to accommodate forecasted traffic volumes. With the increase of road users within Rocky View County’s boundaries due to newly created residential, agricultural, business, and institutional development, the County requires the development of a long range transportation network to efficiently transport traffic to provincial highway systems.

The long range regional transportation infrastructure network is based on the build out traffic volumes resulting from development in growth areas of Rocky View County. All roads within the long range regional transportation infrastructure network will be constructed to meet the required cross sections as detailed in the project costs and consist of:

- Network A Road – 11.4m Paved Surface within a 36m Right of Way;
- Network B Road – 9.0m Paved Surface within a 30m Right of Way;
- 4 Lane Arterial Road – 23.8m Paved Surface within a 40m Right of Way; and
- 6 Lane Arterial Road – 32.2m Paved Surface within a 50m Right of Way.

**Project Costs:**

Upgrade Capital Cost Estimates:

- |                                    |                     |
|------------------------------------|---------------------|
| • 230.4km of Network A Road:       | \$511,987,399       |
| • 440.8km of Network B Road:       | \$841,819,078       |
| • 104.7km of 4 Lane Arterial Road: | \$477,134,240       |
| • 4.1km of 6 Lane Arterial Road:   | <u>\$24,904,844</u> |
| • Total Cost                       | \$1,855,845,561     |

Non-Levy Cost (Background/Regional Traffic): \$445,402,934

Rural Levy Cost (25%): \$463,961,390

Total Estimated Cost to Levy: \$946,481,236

**Rurban Levy Cost Calculation:**

\$946,481,237/22,021 hectares = \$42,981/hectare or \$17,394/acre.

**2024 Rurban Levy Proposed for Collection:**

\$42,981/hectare or \$17,394/acre.



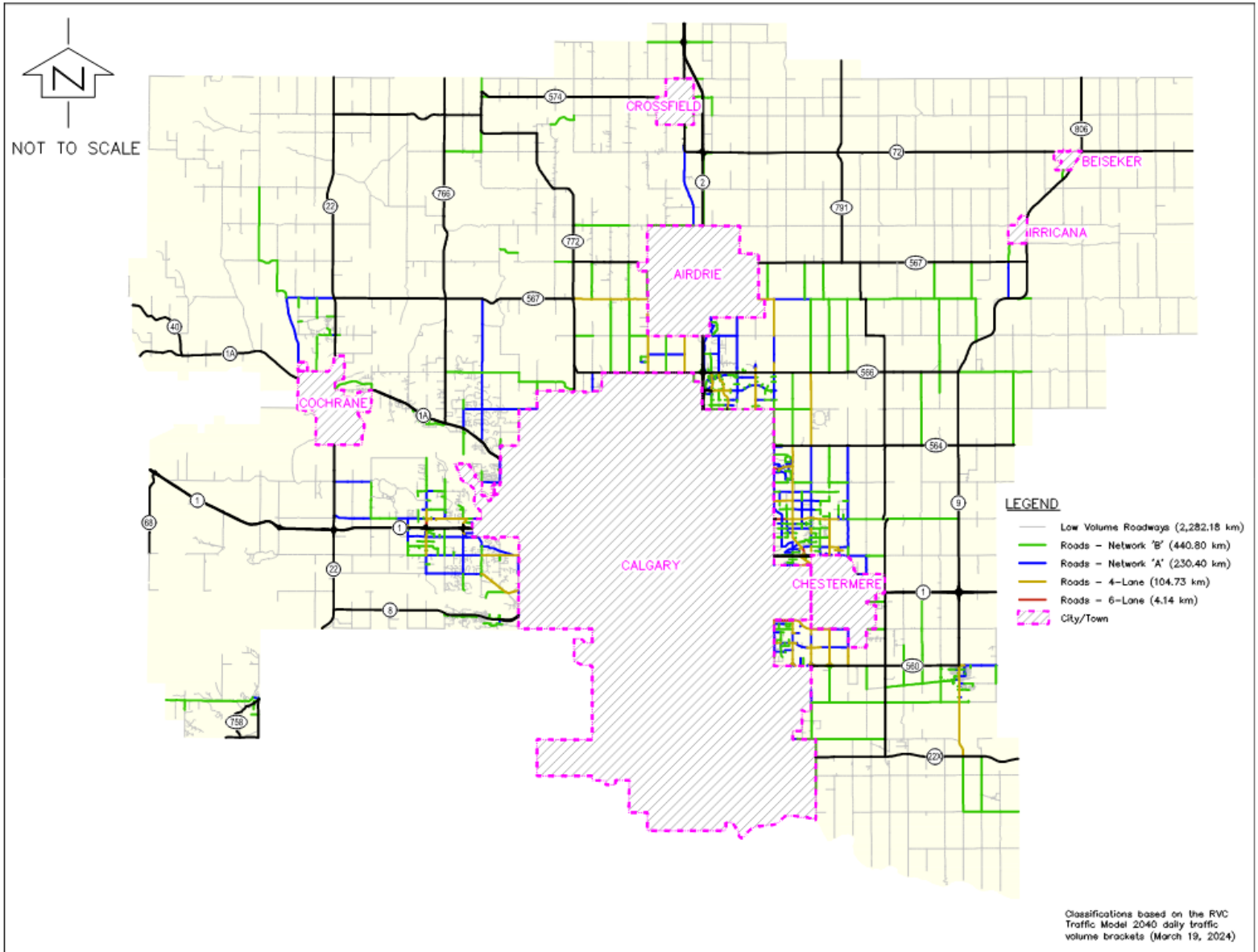
**Cost and Benefit Allocation Rationale (New and Existing Development):**

The lands benefitting from the expanded long range regional transportation infrastructure network include all lands having new development that will increase traffic. Background and regional traffic have been removed from the costs. There are no other measurable benefits to existing development as the upgrade will only increase capacity.



Bylaw C-8549-2024

Map 'A' – Long Range Regional Transportation Infrastructure Network –  
 Rurban and Rural Base Levies



**From:** [Charmaine Tootell](#)  
**To:** [Brenda Mulrooney](#); [Jeannette Lee](#)  
**Subject:** FW: Community Recreation Offsite Levy Bylaw Review  
**Date:** Monday, November 4, 2024 1:03:58 PM  
**Attachments:** [image001.png](#)

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Hi Brenda and Jeannette,

Are one of you able to respond to this inquiry?

Thank you,

**CHARMAINE TOOTELL**

Engineering Coordinator | Capital and Engineering Services

**ROCKY VIEW COUNTY**

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**From:** Robyn Erhardt <[Robyn@twpplanning.com](mailto:Robyn@twpplanning.com)>  
**Sent:** November 4, 2024 1:01 PM  
**To:** Engineering <[Engineering@rockyview.ca](mailto:Engineering@rockyview.ca)>  
**Subject:** Community Recreation Offsite Levy Bylaw Review

Hello,

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.

In addition, I realize the session last week was for the public but that there may be an additional session for the development community. Could you confirm if there will be another information session for the development community?



Thank you for the consideration.  
Robyn

Robyn Erhardt, B.A., M.Plan  
**Township Planning + Design Inc.**  
Urban + Regional Planning, Planner

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We have moved! Please note our new address: Suite 110, 259 Midpark Way SE, Calgary, AB. T2X 1M2

**Linda Hajjar**

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**From:** Patrick McFetridge <patrick.mcfetridge@enrightcapital.com>  
**Sent:** Tuesday, October 22, 2024 3:31 PM  
**To:** Jeannette Lee  
**Cc:** Brenda Mulrooney; Linda Hajjar  
**Subject:** RE: Off-Site Levy presentation

Jeannette,

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.

Thank you.

Patrick

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**From:** Jeannette Lee <JLee@rockyview.ca>  
**Sent:** October 22, 2024 11:06 AM  
**To:** Patrick McFetridge <patrick.mcfetridge@enrightcapital.com>  
**Cc:** Brenda Mulrooney <BMulrooney@rockyview.ca>; Linda Hajjar <LHajjar@rockyview.ca>  
**Subject:** Off-Site Levy presentation

Hi Patrick,

Please find the pdf of the presentation, looking forward to your comments.

Thanks

**JEANNETTE LEE, P.ENG., PMP**

Manager | Capital & Engineering Services

**ROCKY VIEW COUNTY**

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

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[JLee@rockyview.ca](mailto:JLee@rockyview.ca)

**ROCKY VIEW COUNTY – OFF-SITE LEVY BYLAWS**  
**Summer 2024 Draft Bylaws**  
**Comments – Rocky View Forward**  
**September 28, 2024**

**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.

**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.

### **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.

### **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.

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?

The County has acknowledged that the approved Recreation Master Plan, the basis for this levy, has serious flaws. Councillors 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.

The September 24<sup>th</sup> 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.

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.

### 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.

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 within the 20-minute driving threshold of county residents. To the best of our knowledge, such an assessment has not been done.

#### *Inappropriateness of area-specific levy rates*

We acknowledge the logic in having a recreation off-site levy so that new development contributes to the costs of recreation investments in the County. However, when there is so much uncertainty about what needs to be built and where, the use of a two-tiered levy structure with area-specific levies is inappropriate.

Once levies are collected for a specific area, those funds must be used for facilities in that area. Council's September 24<sup>th</sup> discussion illustrated that there is a lack of sufficient clarity regarding recreational needs to lock levy revenues into specific areas.

#### *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.

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?

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.

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.



December 23, 2024

**Rocky View County**

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

**Re: Proposed Amendments to Land Use Bylaw C-8007, 8008, 8009-2020 and C-8550-2024**

Dear Reeve Kissel and Members of Council,

We are writing to express concerns regarding the proposed amendments to the Land Use Bylaws C-8007, 8008, 8009-2020 and C-8550-2024 for January 7, 2025. Given the substantial impact these amendments will have on Beedie, the broader development community, and the recently approved Janet Area Structure Plan amendment.

While the public information sessions held by Rocky View County ("RVC") administration this past Fall were appreciated, they have not provided sufficient clarity regarding the significant levy increases or the methodology behind their calculation. Proceeding with such an important hearing on short notice leaves inadequate time to assess the implications of these amendments fully. We strongly urge that any decisions regarding the levy increases be postponed by at least six months to allow for a more thorough understanding of these proposed changes and their potential impact on development in RVC.

As you know, Beedie has been working closely with RVC administration for over seven years to advance the development of the Janet Long Term Development Area ("Janet"). We very recently received approval of the Janet ASP amendment by the Calgary Metropolitan Region Board, a major step forward for Janet. Unfortunately, Janet now faces another significant challenge should the proposed bylaw amendments be approved. Specifically, the proposed amendments would result in an increase of \$22,499 per acre in levy fees for Janet - an alarming two-fold increase to current rates. This change would lead to an additional \$4.6 million in costs for our lands alone, significantly undermining the competitive advantage that Rocky View County has historically prioritized. In addition, it now unfairly benefits developments that are able to lock-in their levy rates prior to this material increase. We have been diligently working for over seven years to advance Janet and due primarily to political delays we now enter the competitive landscape at a material disadvantage.

In addition to the material increase of the Transportation levy, the inclusion of the Community Recreation Levy for industrial uses further adds to the confusion and concern. While we appreciate the intent of the Community Recreation levy we do not understand why it is beneficial or applicable for industrial developments in Janet.

While we recognize that adjustments to the bylaw are necessary for RVC's growth, the scale of these increases demands more time and information for proper evaluation. Without adequate time to assess their accuracy, fairness and feasibility, it is unclear whether investment in developments like Janet can proceed under these new terms.

In light of these considerations, we formally request a minimum six-month extension to allow for a more comprehensive review of the levy increases and their impact on our development, as well as on other potential projects within RVC.

Sincerely,

A handwritten signature in black ink, appearing to read "Jordan Dawson", with a long horizontal flourish extending to the right.

Jorden Dawson  
Executive Vice President, Industrial Development  
403.724.4627