

ATTACHMENT 'C': APPLICATION REFERRALS

AGENCY	COMMENTS
Province of Alberta	
Alberta Environment	A review of this location, as per the pit operations plans, indicates the presence of naturally occurring water bodies that appear to have a level of permanence. These water bodies located within the identified pit areas may be crown claimed, as per section 3 of the <i>Public Lands Act</i> .
	Contact with the Water Boundaries unit in Edmonton should be made to ensure that these potentially Public Lands, in the form of water bodies, are identified and delineated within this application.
	Should these water bodies be found to be Crown-owned, application for occupation and adherence with the Provincial wetland policy would be required.
	https://www.alberta.ca/water-boundaries.aspx
Alberta Sustainable Development (Public Lands)	No response received
Alberta Culture and Community Spirit (Historical Resources)	No response received
Alberta Health Services	Thank you for inviting Alberta Health Services (AHS) –Safe Healthy Environments (SHE) to review the above-referenced DP application. We understand that this is an application for a gravel pit within NW and SW 31-026-03 W5M. The following supportive documents were received and reviewed:
	 Mountain Ash Operation and Management Plan (SLR Canada, April 2021)
	 Dust Control Plan (SLR Canada, April 2021)
	 Ambient Air Quality Monitoring Plan (SLR Canada, April 2021)
	 Groundwater Monitoring Plan (SLR Canada, April 2021)
	Our records indicate that in 2016 we had reviewed and provided comments on the Summit Aggregate Operations Master Site Development Plan (MSDP) which served as a policy framework to guide and evaluate the development of aggregate extraction on this site. We noticed that the comments or concerns listed in our 2016 letter have been addressed in the above plans. The particulars are

summarized below.



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- We are satisfied with how the applicant is going to communicate with the well owners in terms of water sampling results. The water quality of residential wells included in the water monitoring program will be assessed against The Guidelines for Canadian Drinking Water Quality and the equivalent Alberta potable groundwater guidelines. This monitoring program will commence once the development permit (DP) approval has been obtained and will continue for a period of five (5) years or until the Phase 1 DP expires. The results will be shared with individual well owners on an annual basis. Once a control limit exceedance or increasing trend is confirmed, attempts will be made to identify potential sources and remove or manage them if feasible.
- We are satisfied with the monitoring, record keeping, and complaint response procedures captured in the Dust Control Plan and Air Monitoring Plan. We agree that record keeping, inspections, and oversight will ensure an effective dust mitigation program throughout the lifespan of operations at the Summit Pit. The complaint log that is kept on-site at alltime should be easily accessible upon request during a complaint investigation.
- We are satisfied with where the air monitoring station will be located. Considering the east boundary of the site is downwind from the project during most of the year, and the nearest residence is located approximately 250 m to the east of the project boundary, the station will be able to capture the maximum concentration of particulate leaving the project boundary and reflect the worst-case scenario.
- We are satisfied that the applicant has done an assessment on existing and future industrial emission sources and has a plan to coordinate with future applicants to reduce accumulative effects from multiple operations.

AHS-SHE has no concerns with the subject DP application.

Alberta Transportation

RSDP029840-1; DEVELOPMENT PERMIT REFERRAL – PRDP20211744

Natural Resource Extraction/Processing (Phase 1) and signage (The Summit Pit)

Highway 567; NW-31-26-3-5; SW-31-26-3-5

In reviewing the application, the proposed development falls within the control distance of a provincial highway as outlined in the *Highways Development and Protection Act / Regulation*, and will require a roadside development permit from Alberta Transportation. The application form and instructions can be obtained from the department's website at https://www.alberta.ca/roadside-development-permits.aspx.



AGENCY	COMMENTS
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The department has the following additional comments on the referral:

- Ownership of sand and gravel resources is subject to Section 58 of the Land and Property Act, Chapter L-7 RSA 2000. Prior to extraction of these resources beneath a statutory road allowance or road plan, these roads must be closed and consolidated or otherwise disposed of, as outlined in Section 22 of the Municipal Government Act.
- Implementation of the recommendations of the Traffic Impact Assessment will be a condition of the permit issued by Alberta Transportation, which includes reconstruction of the existing intersection to the Type IVa intersection treatment. Coordination of construction activity with proponents in the immediate vicinity is encouraged.

External Agency

Cochrane Lake Gas Co-op

No response received

Ridgeback Resources Ltd.

No response received

Internal Departments

Agriculture & Environment Services

No agricultural concerns. The applicant will need to ensure that the Weed Management Plan is regularly updated and adhered to.

Capital Project Management

Capital Project Management does not have any projects noted in that area.

Development Compliance

Development Compliance has no comments with regard to this application at this time.

Planning and Development Services - Engineering

General:

- The review of this file is based on the application submitted.
 These conditions/recommendations may be subject to change to ensure best practices and procedures.
- As a permanent condition, the applicant shall provide payment of the Community Aggregate Payment Levy in accordance with Bylaw C-7748-2018, as amended, in the amount of \$0.40 per ton of aggregate extracted and removed.
- As a permanent condition of the future DP, the applicant will be required to provide the County with the EPEA registration for the proposed pit.
- The applicant provided a Dust Control Plan, prepared by SLR Consulting Ltd., dated April 2021. The dust control plan provides control measures to minimize fugitive dust for aggregate crushing and screening, transportation, roads, and wind erosion. Engineering has no concerns with this.



- The applicant provided a Construction Management Plan, prepared by Mountain Ash, dated June 14, 2021. The construction management plan provides general guidelines for construction management for on-site and off-site activities. A detailed construction management plan for the construction of the Type IVa intersection at Range Road 40 and Highway 567 and the paving of Range Road 40 will be required in accordance with Section 1100 of the County's servicing standards. A special condition will be included in a development agreement to provide a detailed construction management plan prior to construction.
- The applicant provided a Good Neighboring Action Plan, prepared by Mountain Ash, dated April 2021. The good neighboring plan is prepared to address neighbor concerns and effectively mitigate any cumulative effects that may arise during operations. The good neighbor action plan provides a summary of aggregate operation within the summit pit, establishes a mechanism for ongoing communication between MALP and the surrounding residents, businesses, and stakeholder groups, and provides a means to resolve complaints or disputes arising from aggregate operations. Engineering has no concerns with this.
- The applicant provided a landscaping plan, prepared by SLR Global Environmental Solutions, dated April 15, 2021.
 Engineering has reviewed the plan and has no concerns with it.
- The applicant provided an updated Air Quality Assessment, prepared by SLR Consulting (Canada) Ltd., dated May 21, 2020. The assessment provides an air quality assessment of emissions associated with the activities and operations of the proposed aggregate development. The assessment concluded that the proposed mining operation is not expected to exceed Alberta Ambient Air Quality objectives beyond the subject lands and has a limited impact on nearby residences.
- The applicant provided an Ambient Air Quality Monitoring Plan (AQMP), prepared by SLR Consulting (Canada) Ltd., dated June 2021. The AQMP is prepared to meet the objects of Alberta's Ambient Air Quality and the Canadian Council of Ministers of the Environment standards. Quarterly or annual reports will be prepared as needed.
- The applicant provided an Acoustic Assessment Report, prepared by SLR Consulting (Canada) Ltd., dated May 21, 2020. The acoustic Assessment assesses the potential sound egress from the site operations in relation to the nearest noise-sensitive receptors. The assessment of predicted sound levels concluded that the Summit operations should not exceed the sound level criterion at any noise-



sensitive receptors, with the inclusion of the proposed acoustic mitigation measures.

 The applicant provided a Noise Monitoring Plan, prepared by SLR Consulting Ltd., dated April 2021. The sound monitoring plan will be implemented to ensure sound monitoring criteria are not exceeded in accordance with MSDP. A monthly monitoring report will be produced detailing the sound monitoring procedure, sound level results, weather conditions, site activities, subjective observations, comparison against monitoring criteria, and applicable action items after each survey.

Geotechnical:

- The applicant provided a Hydrogeological Assessment Report prepared by SLR Consulting (Canada) Ltd. dated January 14, 2020. The report concludes that the mining of the aggregate resources will be extracted to a maximum of 1.0m above the maximum level of the groundwater table. No adverse net impact of development at the site on surface water or groundwater users in the vicinity is expected.
- The applicant provided a Groundwater Monitoring Plan, prepared by SLR Consulting Ltd., dated April 2021. The groundwater monitoring plan provides information on the groundwater flow regime at the site and adapts the basal elevation of the pit in response to observed groundwater levels. A risk management plan will be developed for this site for the control limit exceedances or increasing trends. As a part of Groundwater Monitoring, the applicant shall take monthly readings of the groundwater levels to ensure mining activities remain a minimum of 1.0 m above the recorded groundwater levels at all times. The applicant will provide the County a groundwater monitoring report annually including data summaries and an interpretation of the results with respect to the environmental performance of the site as well as any recommended changes to the monitoring program.

Transportation:

- Access to the site will be via Range Road 40.
- The applicant provided a Summit Aggregate Pit TIA update, prepared by Watt Consulting Group, dated March 10, 2020. The TIA update summarizes analysis updates required for the Transportation Impact Assessment completed in 2014 for the intersection of Highway 567 and Range Road 40. As per the Summit Aggregate Pit TIA, a Type II intersection would be required upon opening day, a Type III intersection at the 10-year horizon, and a Type IVa intersection at the 20-year horizon.
- As per the MSDP, Mountain Ash Limited Partnership intend to construct a Type IVa intersection as a condition of Stage 1 development permit to satisfy the ultimate 20-year horizon.



- Prior to issuance of DP, the applicant will be required to enter into a Development Agreement with the County for:
 - The upgrade of Range Road 40 to an industrial paved standard (400.6) from Highway 567 to the site access;
 - Upgrade of the intersection of Range Road 40 and Highway 567 to a Type IVa standard including all signage and any other roadside indicators to the satisfaction of AT;
 - Obtaining Roadside Development Permit and other necessary approvals from AT for the Highway Intersection improvements;
 - Removal and reclamation of the existing access from Highway 567 to the satisfaction of AT;
 - Registration of necessary easement, right-of-ways, and/or restrictive covenants to the satisfaction of the Alberta Transpiration and the County;
 - Submission and implementation of the recommendations of the geotechnical report and pavement structure design;
 - Submission and implementation of the recommendations of the stormwater management report for the intersection and road upgrades; and
 - Submission and implementation of the recommendations of the Construction Management Plan:
- The applicant submitted a Haul Routes Plan, prepared by Watt Consulting Group, dated April 22, 2021. The haul routes plan provides information pertaining to anticipated haul routes, hauling hours, enrollment with Alberta Sand and Gravel Association's truck registry program, driver's behaviors, incidences, equipping trucks with GPS unit, and removing loose debris from the local network. Engineering has no concerns with this.
- Prior to issuance of DP, the applicant will be required to provide payment of the Transportation Offsite Levy, in accordance with the Transportation Off-site levy bylaw C-8007-2020, for the total gross acreage of the gravel pit and areas associated with gravel extraction activities for Phase 1.

Sanitary/Waste Water:

- As per the MSDP, sanitary servicing will be provided by portable facilities.
- Engineering has no concerns at this time.



Water Supply And Waterworks:

- As per the MSDP, the water servicing will be provided by portable facilities.
- Engineering has no concerns at this time.

Stormwater Management:

- The applicant provided a Stormwater Management Report, prepared by SLR Consulting Ltd., dated April 2021, which provides the overall stormwater management concept for the gravel pit. The stormwater management strategy will be implemented over six phases as the site develops. The surface water management measures for each stage include perimeter and interception ditches, settlement ponds, and infiltration sumps to manage and treat the runoff from the screening berms/overburden stockpiles mounds. The stormwater management within the extraction areas will be through sump and ground infiltration.
- It's to be noted that stormwater ponds are required to be lined to avoid contamination of groundwater and risk mobilizing existing contaminants in the soil or groundwater. The current stormwater management plan doesn't show the liners for the stormwater ponds. Prior to issuance, the applicant shall provide an updated stormwater management plan incorporating the liner in accordance with County's servicing standards.
- Prior to occupancy, the applicant is required to provide asbuilt drawings of the on-site stormwater management facilities. Once received, the County shall perform an inspection of the proposed stormwater management facilities ensuring the proposed facilities were constructed as per the approved Stormwater designs.
- The applicant provided an Erosion and Sediment Control (ESC) Plan, prepared by SLR Consulting Ltd., dated April 2021. The ESC plan provides ESC measures to prevent offsite sedimentation into adjacent vegetated lands and any permanent or ephemeral watercourses/wetland. However, the ESC plan does not meet the requirements of the County to show soil loss calculations.
- Prior to issuance of future DP, the applicant will be required to provide an updated Erosion & Sedimentation Control Plan (ESC) prepared by a qualified professional in accordance with Section 1200 of the County's servicing standards.
- Prior to issuance of future DP, the applicant will be required to provide an Erosion & Sedimentation Control (ESC) Plan prepared by a qualified professional, providing the ESC measures to be implemented for the construction of the Type IVa intersectional at Range Road 40 and Highway 560 and the paving of Range Road 40 in accordance with County's servicing standards.



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Environmental:

- The applicant provided a Biophysical Impact Assessment (BIA) prepared by SLR Global Environmental Solutions dated January 2020.
- Following are the findings of BIA
 - Soil: The on-site soils have low wind erosion risk and moderate water erosion risk; no sensitive soils were observed within the Project area during the field investigation.
 - Vegetation: Vegetation in the project area has been heavily modified by agricultural land use. No rare plants were found in the Project area. No prohibited or noxious weeds listed under the Weed Control Act were observed.
 - Wildlife: Provincially sensitive species and federally listed species have the potential to be present within the Project area. The Project area consists of primarily disturbed habitats and the area surrounding the Project consists of a similar intensive agricultural land use. The Project is expected to result in minimal loss of wildlife habitat, and no interaction with or disturbance to species at risk.
 - Wetland: 20 wetlands are present within the project area and close vicinity. Based on the conceptual footprint for the Project, the two larger wetlands in the northwest corner of the Project area and four (4) wetlands in the sensitive SW corner of the Project area will be avoided. The other 14 wetlands are removed to accommodate planned development phases through AEP approval.
 - Water Resources: No mapped watercourses were identified in the Project area during the desktop review, and no obvious drainages were observed during the field assessment.
- As per the BIA, the area has a high potential to contain a historic resource of the archeological concern. Prior to the issuance of DP, the applicant will be required to obtain clearance under the *Historical Resources Act* prior to commencing with mining activities.
- The applicant provided a Wetland Assessment and Impact Report, prepared by SLR global environmental solutions, dated February 2020. As per the Wetland assessment and impact report, no mapped watercourses are identified within the project area. A total of 20 wetlands were identified for the project area and assesses in the field. Submission under the Water Act and the Public Lands Act will be required for the disturbance to these wetlands.



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	The applicant provided a Post-Mining Reclamation plan and Soil and Weed Management Plan, prepared by SLR Consulting Ltd., dated April 2021. Both, the post-mining reclamation plan and Weed Management Plan are developed based on biophysical impact assessment and will follow the requirements of the Code of Practice for Pits. Engineering has no concerns with this.
	 As a permanent condition, the aggregate development must align with all relevant municipal, provincial, and federal legislation, regulations, and policies.
Fire Services & Emergency Management	They will need to ensure all roads comply with the following.
	1. NBC (AE) Div B 3.2.5.4. Access Routes
	2. NBC (AE) Div B 3.2.5.5. Location of Access Routes
	3. NBC (AE) Div B 3.2.5.6. Access Route Design
Road Operations	 Applicant to be reminded that any material removal from the proposed gravel pit will be subject to the County's Community Aggregate Payment Levy Bylaw C-7748-2018.
	2. Volker Stevin has applied for a development permit for the construction of a highway maintenance yard and facility to be located at the south end of Rge Rd 40 which also proposes road upgrade work to Rge Rd 40. With both these proposed developments (i.e. Summit Gravel Pit and Volker Stevin Highway Maintenance Yard & Facility) being in close proximity to each other and both proposing road upgrade work to Rge Rd 40, recommend there be coordination between the two (2) proposed development permits in terms of the proposed road upgrade work to Rge Rd 40 and proposed use of Rge Rd 40 to access each site.
Transportation Services	No response received
Utility Services	RE: PRDP20211477 - Development Permit Application; Roll #06731002 / 06731004

Agency Circulation Period: May 4, 2021, to May 25, 2021 - Agencies that were not required for distribution are not listed.

circulation.

Utility Services water and sewer have no comment to add to this

Adjacent Landowner Circulation Period: May 13, 2021, to June 3, 2021