



**BEAVER COUNTY**

# WHAT WE HEARD REPORT



*This page is left intentionally blank.*



## TABLE OF CONTENTS

1. BACKGROUND .....	1
2. PURPOSE.....	2
3. STAKEHOLDER ENGAGEMENT .....	2
4. INFORM .....	4
4.1. Information Package.....	4
4.2. Advertising.....	4
5. PUBLIC ENGAGEMENT .....	5
5.1. Public Engagement.....	5
5.2. Public Survey .....	5
5.3. Stakeholder Comments .....	6



# 1. BACKGROUND

Beaver County is currently completing a strategic Municipal Development Plan Bylaw (“MDP”) and Land Use Bylaw (“LUB”) review and update to address current challenges with the existing MDP and LUB. Hence, this project did not involve a complete rewrite of the documents but focused on strategic updates requested by the County.

For the MDP, the overall changes focused on the following:

- Reformatting of the document to increase appeal and ease-of-use.
- Editing the policy wording for increased clarity and conciseness.
- Preserving the nature and intent of the existing vision and goals while making them clearer for decision makers, administration, and the community.
- Updating the intermunicipal collaboration and governance sections to ensure alignment with Intermunicipal Development Plans (“IDP”).

Within the MDP, the core areas for policy updates were related to the following:

- **Resource Extraction:** Clarified that the County issues approval first, not the Province.
- **Industrial Development:** Strengthened policies for site considerations for industrial development and added policies to identify off-site levies.
- **Transportation and Utilities:** Added policies for federal aviation requirements.
- **Country Residential Development:** Multi-lot country residential development and subdivision requirements rewritten to ensure consistency with LUB.
- **Renewable Energy:** Added policies for commercial renewable and alternate energy facilities.
- **Crown Lands and Telecommunications:** Sections created to clarify role of the municipality for development.
- **Overlay Districts:** Establishing overlay districts related to federal and provincial regulations – aerodrome, landfills and wastewater facilities.

For the LUB, the overall changes focused on the following:

- Reformatting the document to increase appeal and ease-of-use.
- Moving administrative processes to the latter part of the Bylaw to help users access key components of the Bylaw more easily.
- Updating/modernizing language throughout.
- Updating the document to match legislation and the IDP and MDP policies.
- Simplifying and generalizing many permitted and discretionary uses (every use has a definition now with consistent language).
- Increasing the number of permitted and discretionary uses in every district.
- Adding development regulations to every district for clear expectations around development standards.



Within the LUB, the core areas updated with regulations were the district changes and overlay regulation additions. District changes were related to the following:

- **Crown Land District** to provide the County the opportunity to provide input on the potential impact of land uses and development on those lands governed and managed by the Crown;
- **Tourism District** to provide opportunities for tourism-related businesses and activities within the rural environment; and
- **Direct Control District** to enable Council to exercise particular control over the use and development of specific and unique land uses in any manner Council may consider necessary.

Overlays were added to the draft LUB to relate to specific setbacks required by legislation. These overlay regulation updates were added:

- Airport Protection Overlay;
- Landfill Setback Overlay; and
- Sanitary Facilities Overlay.

Because these documents are not undergoing a complete rewrite, the core areas outlined above were updated, as requested by the County in response to current challenges the County is experiencing. These core areas were also informed and shaped by administrative working sessions, Council working sessions, and public input from the community.

## 2. PURPOSE

Strong engagement with Council, administration, County residents, and other stakeholders is crucial when developing or amending statutory documents. As a part of the project, County Council participated in the in-person information/engagement workshop sessions to provide their vision and goals for the MDP and LUB. Similarly, County administration participated in a session to provide important information regarding any current or potential issues that they foresee, as well as opportunities. The public and stakeholders were provided the opportunity to learn about the project, provide their input, and give feedback throughout its development of the specific changes identified by Council.

The purpose of this document is to outline the input and feedback received by Council, administration, public and stakeholders, and discuss how their input was or was not addressed and why in the development of the MDP and LUB Update.

## 3. STAKEHOLDER ENGAGEMENT

Beaver County places great emphasis on the comprehensive stakeholder engagement to guide the development of the MDP and LUB strategic updates. The County intended for the project



to be informed by the knowledge of administration and the vision of Council with input from the community on the proposed strategic amendments to the MDP and LUB.

The purpose of the engagement process was to gather local insight from stakeholders to refine the existing MDP and LUB, and ultimately, to obtain consensus around policies, regulations, and land uses within the County.

To see provide transparency in the process and recommended changes to the MDP and LUB update involved a three-step process – inform the community of the project being carried, engage with the community followed by providing feedback of the changes being made, and empower through people having the ability to further express their views and comments through the formal public hearing as outlined below:



### STEP 1 INFORM & ENGAGE

Inform and engage the community in the planning process, project timelines and provide background information.

A project webpage on the County’s municipal website was set up to notify the general public of the project and its intent/purpose. The project team prepared the content for the County to post. The communication at this stage of the project was focused on the project objectives, processes, and opportunities to provide input. A Project Overview information brochure was created to inform people about the project that was also posted on the County’s webpage. This step also involved meeting with Council and administration to understand current challenges they experienced with the two documents and the specific focus of the changes.



### STEP 2 FEEDBACK

Provide a draft of the MDP and LUB and share it with the community to obtain feedback and input.

Experience has demonstrated that municipalities will obtain a better buy-in from all stakeholders and decision makers if time is spent taking the draft document through a feedback loop process. The project team and the County organized two open houses to provide an in-person opportunity to explain the strategic changes being made to the MDP and the LUB Update project, as well as a survey that could be taken online or in-person. This feedback loop provided an opportunity for the community to voice their opinions along with the opportunity for the project team and the County to carry out any additional refinements and edits or identify other changes to make beyond the focused updates provided by Council.







### STEP 3 EMPOWER & ADOPT

The public and stakeholders can participate in the public hearing process by presenting directly to Council during the Public Hearing, or by providing written comments prior to the Public Hearing.

Through the formal public adoption process, stakeholders and the public will have an opportunity to present their support or opposition to the proposed updates to the MDP and LUB. Council will be empowered to make a decision to adopt the proposed changes.

The input, feedback, and conversations that occur during this three-step process are documented in this What We Heard Report, which will accompany the final updates to the MDP and LUB presented to Council for adoption.

## 4. INFORM

### 4.1. Information Package

In early June 2023, a Project Overview Information Package was created and posted on the County's webpage for public viewing. This information package provided:

- A thorough explanation of the Alberta Planning Hierarchy;
- The requirements of a MDP and LUB, as outlined in the *Municipal Government Act*;
- An overview of the project; and
- Ways for the public and stakeholders to get involved.

The PDF of this document is contained in Appendix A.

### 4.2. Advertising

Advertisements ran in the newspaper and via the County's social media platforms to publicly advertise the project and to invite the public to attend the Open House sessions on November 1<sup>st</sup>, 2023. These advertisements ran in the Beaver County Chronicle in the following editions: October 18, 2023, October 25, 2023, and November 1, 2023. The County's website provided the opportunity to create a specific landing page for the proposed changes to the MDP and LUB which contained relevant information such as the project information package, project presentation and engagement boards that were shared at the Open House sessions, the draft updates to the MDP and LUB, and the link to fill out a survey in providing feedback.



## 5. PUBLIC ENGAGEMENT

### 5.1. Public Engagement

In the evening of Wednesday, November 1st, 2023, the County hosted two 4-hour drop-in Open House sessions, concurrently in the Town of Viking and the Town of Tofield at the Town community halls. The consultant project team along with County administration and Council representatives determined that two sessions were needed to aid in providing access to the public in context to the size of the County.

The public Open House sessions provided information about planning hierarchy and what an MDP and LUB is, the planning process, and the specific changes that have been made to the documents. The engagement provided the public with the opportunity to understand the purpose of the specific changes to the MDP and LUB and contribute input regarding the changes being proposed or other aspects related to the two documents.

At the Open Houses, residents were encouraged to fill out a survey on the MDP and LUB to share their comments about the documents.

### 5.2. Public Survey

From October 20, 2023, to November 17, 2023, stakeholders and members of the public were invited to take a public survey, online or in-person at the Open House sessions. There was a survey for the MDP and a survey for the LUB. No actual surveys were submitted through the survey link, however, there were comments that were submitted to the County regarding the MDP and LUB Update project. One of the responses answered the MDP and LUB survey questions consolidated in their own format as shown in the table below:

PUBLIC SURVEY – MDP & LUB	
Question	Respondent Answer
Response 1	
Are we familiar with the MDP & LUB ...	YES
Have we read these in their entirety? ...	YES
Have we read the drafts for both of these ...	YES
Have we read portions of the drafts that were relevant to us ...	YES ... and all remaining portions.
Do we know what policies apply to our land in both of these	YES
What is our district in the current LUB & MDP?	Country Residential
What is our district in the draft LUB & MDP?	Beaver Hills Moraine





The table in the next section outlines the comments that were submitted.

### 5.3. Stakeholder Comments

The following table contains the comments collected from stakeholders and how they were addressed or why they were not addressed. For the purposes of maintaining the confidentiality of the participants, their names have not been included:

EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
Response 1	
<p><b>In response to survey question: Based on your views on the community, what do you think might be missing in relation to the goals and vision of the community in the new Municipal Development Plan:</b></p> <p>Introduction: We are pleased to participate in this very important review process by Beaver County and fully recognize the need to improve the clarity and use of both the Development Plan and Bylaws.</p> <p>We also recognize the need for the process to incorporate practical land use and policy changes to address or promote specific elements within our county such as industrial parks, lighting, agri-tourism, recreation, and campground issues. However, at this time we've focused on the proposed changes to land uses in Country Residential, Beaver Hills Moraine district and these appear in Part II, under your survey request for "other comments".</p> <p>The undertaking of this review process is a daunting task, and we wholeheartedly congratulate those who have given it shape and meaning. We also welcome the objectives entrenched in the process to engage and inform the community, especially to seek its input into the process, including for what is contemplated as follow up.</p> <p>We have found the time between when the process was first announced in the Tofield Mercury, to the public information meetings, to the deadlines for this comment, as rather short, given the magnitude of the proposed changes.</p>	<p>Comments noted; the County has carried out a series of information and engagement as noted in this report. As reference in the response, the formal public hearing process provides additional opportunity to provide input to Council in making a decision on the adoption of the Municipal Development Plan and Land Use Bylaw.</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p>However, we assume this will be balanced by the provision of other opportunities for input.</p> <p>Those who prepared and published the resources for this review, including all the documents, information background and display materials, are to be congratulated; these have greatly facilitated the access of a wide range of complex materials for easy, informative, and digestible public access.</p>	
<p><b>In response to survey question: What do you think might be missing in relation to uses or regulations in the new Land Use Bylaw:</b> While reviewing the documents we reflected on the current review's focus for rendering the development plans and bylaws more efficient in promoting and supporting future business development. In so doing, the County has undertaken to refine and improve a "business as usual approach" to possible further parcellation of land within its borders, as well as anticipated and hoped-for changes to land uses. We worked to develop a list of questions, comments and suggestions related to that review in Part II, below.</p>	<p>The County has taken a balanced approach to updating the MDP and LUB based on specific issues identified through feedback on the existing documents. As the County moves forward it will continue to monitor implementation and identify if additional changes are required.</p>
<p>During our undertaking to review the documents, we found ourselves asking how the bylaws and development plans could more deliberately be shaped to deal with the critical upheavals that are already taking place, relative to issues like climate change, the biodiversity crisis and economic uncertainties, all of which are expected to worsen in the decades ahead</p> <p>In addition, we questioned how dealing with these issues could be planned along with the shaping of economic instruments, so as to avoid well known conflicts that have proven to accompany these uncertainties, e.g., neighbour vs. neighbour, environment vs. jobs conflicts or simple resistance to taxation or municipal policy changes.</p> <p>Evidently, these questions are beyond the scope of the current review. However, we recall that in 2017 Beaver County undertook to develop a sustainable development plan (<a href="#">click here</a>) which appeared to be future-oriented in its goals. A 37-person Steering Committee, led by County</p>	<p>The MDP outlines multiple policies and goals that speak to the growing biodiversity within the County and the climate change crisis.</p> <p>Intertwined in Section 2.0 Vision and Goals, the MDP states one of its goals is for the "Preservation of wildlife habitats and environmentally sensitive areas." Additionally, it has been expressed within this section how it is important for the County to develop in a sustainable manner. It is outlined that economic diversification must be environmentally sound and residential areas must harmonize with the environmental sensitivities of the area.</p> <p>Section 11.0 Environmentally Sensitive Areas, strictly indicates that the intent of the MDP is to "ensure environmentally sensitive areas are not jeopardized by land use and development." This section outlines the objectives relating to the protection of the County's biodiversity, specifically in Beaver Hills Moraine, with policies</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p>Council and including a cross-section of residents met in three workshop to brainstorm strategic directions, related to agriculture &amp; renewable energy, environment &amp; wetlands, population, public participation, investment &amp; economic diversification, and other issues that included housing. The output of this plan might be a good starting place to shape vision statements and objectives for the next review of the Development Plan and Bylaws.</p> <p>Gazing into the crystal ball, we feel that references to high-level warnings about the growing biodiversity and climate change crises need to be referenced in future plans. Of significance, is that on these issues, expectations for municipalities, including those in rural areas, to institute change are enormous. We understand that our national and provincial governments - as with many other countries – have been slow to translate world targets into country plans that can realistically be addressed by municipalities. We also appreciate the challenges facing municipal authorities that wish to act in the face of political or economic resistance by their own provincial governments.</p>	<p>that demonstrate how the County will meet these objectives.</p> <p>Environmental protection and preservation goals are integrated throughout the whole MDP. For example, Policy 4.9 indicates that the County must require country residential development to comply with policies regarding the preservation of environmentally sensitive areas and critical wildlife habitat, resource extraction, recreation, and historical and archaeological features.</p> <p>Additionally, there is regulation within the LUB to support the goals to preserve biodiversity and combat climate change. For example, subsection 5.6.9 of the LUB references the support of sustainable housing projects that include methods that reduce energy use and increase water efficiency which would directly help with the climate change crisis.</p> <p>Understanding the context of Beaver County and the risk for wildfires, subsection 5.6.10 and 5.6.11 addresses these concerns and provides mitigation measures for fire prevention. These regulations understand the importance of protecting wildlife and vegetation and sets actions to support these goals.</p>
<p>Nonetheless, the realities of global crises are clearly coming home to roost here in Beaver County. The increase in brush fire incidents last summer in our County, by itself, is evidence of a future that has already arrived and a portent of a future to come that will include a broad range of other problems. These are sure to pose a number of greater challenges to future development plans by the County and the administration of bylaws.</p> <p>The current review does not address any of these. However, given the expectations for municipalities to provide leadership that addresses these changes, predictive actions that could be less disruptive and less expensive in the long run need to be discussed.</p>	<p>The review of the MDP and LUB carried out by the County was focused on specific sections. The County recognizes the changes within its environment and continues to work on initiatives to address these risks as indicated in the comments above.</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p>That fact that Beaver County is home to wetlands of global significance underscores this point. A portion of Beaver County is contained within the UN-designated Beaver Hills Biosphere (BHB), especially those areas designated as “country residential”, “moraine” or “wildlife areas” in the review documents. The BHB produced three excellent reports related to these wetlands in our county, one in 2019, another in 2020. Both point to existing problems and possible courses of action to deal with them; both in keeping with observations made and targets adopted by global biodiversity and climate change decision-making. Of significance, the reports allude to and suggest ways forward that prevent further damages to existing wetlands in our County and to the need for restoration programs, i.e return to historical levels.</p>	<p>The Beaver Hills Biosphere has specific policy related to contributing towards its protection while balancing the interests of landowners in the area. In relation to wetlands, the County has in place setback provisions from wetlands; however, the management and control of these natural features is within the purview of the province and requires approval and compensation should wetlands be removed.</p>
<p>Both biodiversity and climate change targets in these reports point, not only to changing behaviours that continue to cause damage but to the need to also prevent further damage and for further actions to restore existing damage to previous levels. Unfortunately, the current review allows little reference to prevention or restoration issues. As well, the global targets it contains include notions of indigenous involvement with related issues, as do the precepts of the Beaver Hill Biosphere. A future review could better address these areas, as well.</p>	<p>The MDP highlights the importance of the Beaver Hills Moraine (or otherwise called the Beaver Hill Biosphere). Biospheres are regions in which people live and work in harmony with nature; however, they are not officially protected by Federal or Provincial legislation.</p> <p>Although Beaver Hills Moraine is not protected by federal and provincial legislation, the County understands the importance of protecting this environmentally sensitive area, therefore the policy contained in Section 4.0 seeks to mitigate and avoid disruption to the area.</p>
<p>A suggested course of action:</p> <p>Incorporating issues like those discussed above into future vision statements for any bylaw review would fundamentally change the county's perspectives for subdividing land or allowing changes to land uses.</p> <p>A first step could be to revisit the recommendations contained in the sustainable development review undertaken by Beaver County in 2017 as the focus for a task force to be formed in the near future with a mandate to update and put practical ‘arms and legs’ to them. Such an entity could be asked to return with a practical framework for a new</p>	<p>Thank you for your recommendations which will be raised with Council.</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p>Development plan and Bylaw review, to take place within a few years. With public involvement in the process, the initial phase need not be costly, and the NAME REMOVED is certainly prepared to assist in the process. We are engaged on these issues with other organizations.</p> <p>Of significance is that, in the current review process, Beaver County has displayed the capacity to develop and produce a state-of-the-art public consultation process for decision making, and this paves the way for a deepening of the process.</p>	
<p>Several models exist that might be useful in shaping the follow up to the 2017 Report, some of which are provided here:</p> <p>Camrose Green Action Committee: <a href="http://camrose.civicweb.net/document/37509/">camrose.civicweb.net/document/37509/</a></p> <p>Halton, Ontario: Regional Forest <a href="https://www.halton.ca/The-Region/Explore-and-Enjoy-Halton/Regional-Forests">https://www.halton.ca/The-Region/Explore-and-Enjoy-Halton/Regional-Forests</a></p> <p>Toronto: Biodiversity in the City <a href="https://www.toronto.ca/explore-enjoy/parks-gardens-beaches/ravines-natural-parklands/biodiversity-in-the-city/">https://www.toronto.ca/explore-enjoy/parks-gardens-beaches/ravines-natural-parklands/biodiversity-in-the-city/</a></p> <p>Edmonton: Our Strategy for Biodiversity Protection <a href="https://www.edmonton.ca/city_government/environmental_stewardship/strategy-biodiversity-protection">https://www.edmonton.ca/city_government/environmental_stewardship/strategy-biodiversity-protection</a></p> <p>Calgary's Biodiversity <a href="https://www.calgary.ca/parks/wildlife/biodiversity.html">https://www.calgary.ca/parks/wildlife/biodiversity.html</a></p>	<p>Thank you for your comment and information.</p>
<p><b>Part II. Other Comments:</b></p>	<p>Thank you for your concern. In various sections of the MDP, there are objectives and policies dealing with development within the Moraine and</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p><b>A.</b> The review specifies as an overriding consideration, that any development should not</p> <ul style="list-style-type: none"> <li>• Unduly interfere with the amenities of the neighborhood, or</li> <li>• Materially interfere with or affect the use, enjoyment or value of neighboring properties.</li> </ul> <p>Further, the Country Residential Development plan recognizes the Beaver Hills Moraine as having significant and sensitive environmental features. As well, the County also acknowledges that a higher priority will consider conservation, protection and restoration of natural areas.</p> <p><u>Concern 1:</u></p> <p>There are many wetlands in the Ministik and Moraine regions that need to be conserved as they are in danger of losing wildlife habitat and biodiversity. Conservation approaches of these wetlands are far less intrusive and costly than restoration efforts. Wildlife corridors and migratory patterns could be jeopardized by further development. See Wetlands Alberta - <a href="https://goo.gl/EBGrBR">https://goo.gl/EBGrBR</a>. and DUCs <a href="http://www.ducks.ca/our-work/wetlands">www.ducks.ca/our-work/wetlands</a>, <a href="http://www.ducks.ca/biodiversity">www.ducks.ca/biodiversity</a></p>	<p>Ministik regions, as well as in accordance with the wildlife and environmentally sensitive areas.</p> <p>All development permit and subdivision applications are reviewed on a case-by-case basis due to the uniqueness and diverse natural environments throughout the County.</p> <p>It is not uncommon for the Development Authority or Subdivision Authority to review the lands for environmental sensitivities (whether for the location within the Moraine, extreme wetlands, or compatibility of the proposed development with the land). The County, in some instances, may not allow the development to proceed if there are too many nuisance factors that could negatively impact the environment, or the County may request an Environmental Easement be put in place. In some instances, if the lands are too fragile, there may be a necessity for an environmental impact assessment, or involvement of Alberta Environment. As part of an application for a subdivision or Area Structure Plan, they are referred to relevant government agencies for input. Please note that water bodies are administered by the province and federal agencies if fish bearing.</p>
<p><u>Concerns 2:</u></p> <p>It appears the County is preparing to accommodate further sub development. Stated policies appear good in theory, but by observing what actually occurs in sub development areas, on specific properties, the environment could continue to be negatively affected by an increased number of landowners.</p>	<p>The County is seeking to attract people and economic development while balancing the impact on the environment. For the County to be fiscally resilient, it needs to attract economic growth and provide housing choices for a range of people within the community. However, the County also recognises that balancing development while protecting the environment is important to the welfare of all those in the community. An example of how the County is balancing the desire for economic development and growth with environmentally sensitive areas, the County has limited the density of development in the west end of the County. Between the MDP and LUB there are a range of policies and regulations that enable the</p>





EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
	management between these elements on top of provincial and federal regulations.
<p><b>B. MDP Policy 4.9 and 4.22</b> (and referring to Land Use Bylaw 5.6.9, where 'the County will support' and perhaps consider encouraging sustainable housing projects)</p> <p><u>Comment:</u></p> <p>We recommend that the County adopt a position that 'any new development (in the Ministik and Moraine zones) needs to include a 'Green' or 'Eco' design plan? This would introduce provisions that lessen the human footprint in the environment, and could lead to future 'green' buildings in the area/county and highlight the County's Sustainability vision. See Beaver County Sustainability document 'Home. Grown. April 2017 <a href="http://beaver.ab.ca">205398 (beaver.ab.ca)</a></p>	<p>As mentioned above, the County limits density within the Ministik and Moraine areas as a tool to preserve green space. Any development requiring an Area Structure Plan requires a range of background studies as outlined in section 18.10 of the MDP. The purpose of these studies is to determine the potential impact on the environment and measures to mitigate, remedy or avoid the impacts.</p>
<p><b>C. Policy 4.11</b> The County shall allow agriculture and agriculture-related uses in multi-lot country residential subdivisions.</p> <p><u>Question:</u></p> <p>The County needs to consider the total environmental impact if many landowners in a subdivision want to raise their maximum allowable numbers of animals? See Bylaw 22-1130.</p>	<p>Thank you for this observation. The County will consider this.</p>
<p><b>D. 8.0 Wildlife</b></p> <p><u>Question:</u></p> <p>Concerning the Statement of Intent when referring to the Beaver Hills Moraine and future development proposals, concrete assurances are needed that the area will be preserved</p>	<p>The MDP recognizes the Beaver Hills Moraine for its significant and sensitive environmental features. While country residential development will be allowed in this area, environmental sensitivities will be a higher priority and development will take into consideration the conservation, protection, and restoration of natural areas.</p> <p>The Beaver Hills Moraine, while not officially protected by federal or provincial legislation, is an important natural area in the west end of the County where country residential predominates. Due to Moraine's significance for wildlife habitat, the MDP will encourage the preservation of the area's unique environmental features when considering residential development proposals.</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
	<p>The County also has access to resources within the Beaver Hills Moraine area to provide advise on specific developments to help protect this area and each application is considered individually on its own merits.</p> <p>Sections 2.0 and 7.0 of the MDP offer some guidance on this topic.</p>
<p><b>E. 11.0 Environmentally Sensitive Areas:</b> In the Statement of Intent, (including BH Moraine) that environmentally sensitive areas not be jeopardized by land use and development.</p> <p><u>Concern:</u></p> <p>Allowing further development and permitted or discretionary uses may lead to a negative impact on the environment.</p>	<p>Section 11.0 of the MDP offers guidance with respect to developing in Environmentally Sensitive Areas and what is and what is not permitted. Further guidance, as mentioned in the previous comments is also provided.</p> <p>It is not uncommon for the Development Authority or Subdivision Authority to review the lands for environmental sensitivities (whether for the location within the Moraine, extreme wetlands, or compatibility of the proposed development with the land). The County, in some instances, may not allow the development to proceed if there are too many nuisance factors that could negatively impact the environment, or the County may request an Environmental Easement to be put in place. In some instances, if the lands are too fragile, there may be a necessity for an environmental impact assessment or involvement of Alberta Environment.</p> <p>All applications are reviewed on a case-by-case basis due to the uniqueness and diverse natural environments throughout the County.</p>
<p><b>F. What appears to be missing</b> from the Land Use District Table (of Permitted and Discretionary uses):</p>	<p>Refer to the following responses:</p>
<p><b>For Country Residential,</b> specifications on acreage size and allowable numbers for:</p>	<p>Acreage sizes are determined during the subdivision process and accounted for in various areas of the LUB (Section 5.1.7, 5.1.8, 5.1.10, and 5.6.2) and the MDP (Section 4.0).</p>
<p><b>Campgrounds:</b> Concerns: (allowing 40 sites or more), could lead to issues with noise, unruly behavior, traffic, odour from porta potties, environmental impact, could be very unsightly in smaller subdivisions</p>	<p>Section 7.3 of the LUB provides guidance on preparing a master or conceptual plan to address fire safety, potable water supply, waste management, stormwater management, solid waste management, and traffic impact</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
	<p>assessments. In addition to these requirements in Section 7.3, Section 5.5.8 and 5.5.9 outlines additional development permit requirements the Development Authority may require during the application process (such as visual appearance, noise, and lighting). Applications received would be reviewed and considered based on the application's completeness, compatibility with districting, and mitigation measures to address potential nuisance factors. In addition, campgrounds are considered discretionary in most districts which means there would be public consultation and opportunity for adjacent landowners to express any comments or concerns. The only district where this use is permitted is the Tourism district. Currently, there are no properties districted as the Tourism district as this did not previously exist and the process to rezone a property will include a public hearing to allow public input.</p>
<p><b>Equestrian facilities:</b> Concerns: number of animals, traffic, odor reference Animal Bylaw 22-1130</p>	<p>Equestrian facilities are considered discretionary in Urban General and Country Residential districts and permitted in the Agricultural and Tourism districts. In addition to public consultation (if considered discretionary), the Development Authority may utilize Sections 5.5.8 and 5.5.9 of the LUB to consider additional development permit requirements (including traffic, noise, appearance, odour, etc.). The Animal Control Bylaw is specifically restrictive to the number of household pets and agricultural animals within the Country Residential district, Hamlets, and lands within IDP areas. Animals not permanently occupying the lands would not be considered a household pet nor count towards the agricultural animal count (for that property owner). However, other sections within the Animal Control Bylaw (such as animal cruelty, nuisance, or vicious dogs) must be complied with. In addition, if it was the intent to permanently house some agricultural animals at the property (within the CR district), written permission from the Community Peace Officer or Bylaw Enforcement Officer can be obtained for being over the limit.</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p><b>General commercial use:</b> Concerns: noise, traffic, security, could be unsightly in smaller sub-divisions.</p>	<p>General Commercial Uses are considered discretionary in the majority of the districts, aside from Rural Commercial and Business/Light Industrial. In addition to public consultation (if considered discretionary), the Development Authority may utilize Sections 5.5.8 and 5.5.9 of the LUB to consider additional development permit requirements (including traffic, noise, appearance, lighting, etc.). The development authority can place conditions on issuing a development permit that the applicant must comply with.</p>
<p><b>Kennels:</b> Concerns: number of animals (would the Animal Bylaw 22-1130 apply?) Noise may impact neighbours.</p>	<p>Kennels are considered discretionary in the Agricultural and Country Residential districts and permitted in the Rural Industrial and Medium Industrial districts. The Animal Control Bylaw is specifically restrictive to the number of household pets and agricultural animals within the Country Residential district, Hamlets, and lands within IDP areas. Animals being temporarily boarded at a Kennel would not be considered household pets (for that property owner). However, other sections within the Animal Control Bylaw (such as animal cruelty, nuisance, or vicious dogs) must be complied with. Section 7.11 of the LUB offers some regulations that would address cleanliness, screening of the property, noise, and compatibility with adjacent land uses. In addition to Section 7.11, the Development Authority may utilize Sections 5.5.8 and 5.5.9 of the LUB and conditions may be placed on the permit that the applicant must comply with.</p>
<p><b>Local Industrial:</b> Concerns: noise, traffic, could be unsightly in smaller sub-division.</p>	<p>Section 7.12 of the LUB offers some regulations on Local Industrial Uses. Local Industrial Uses are considered discretionary in the Agricultural, Urban General, Rural Commercial, and Country Residential districts. It is permitted in the Rural Industrial District. Where the use is considered discretionary, public consultation would take place with the adjacent landowners. In addition to Section 7.12, the Development Authority may utilize sections 5.5.8 and 5.5.9 of the LUB.</p>
<p><b>Manufactured Home parks:</b> Concerns: number of units, security issues, could be unsightly in smaller sub-division.</p>	<p>Any new development will have to meet the regulations of the land use bylaw and conditions</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
	<p>of approval of a permit. The County also has an Unsightly Bylaw that applies to all properties in the County. The visual appearance of a building can be very subjective, and enabling various forms provides the opportunity for affordability. If a community is concerned about the form of housing the developer may want to impose restrictive covenants for the development of future building forms that would be the responsibility of the community to manage vs the municipality.</p>
<p><b>Recreation uses:</b> Concerns: dirt bikes, ATVs and snow mobiles, noise and environmental impact; trap and rifle ranges – noise, safety, neighborhood disturbance.</p>	<p>Recreation uses are considered discretionary in the Agricultural, Urban General, Rural Commercial, Rural Industrial, and Country Residential districts. It is permitted in the Tourism district. Where the use is considered discretionary, public consultation would take place with the adjacent landowners. The Development Authority may utilize sections 5.5.8 and 5.5.9 of the LUB.</p> <p>At this time there are no properties districted within the Tourism District. The process of rezoning includes a public hearing where public input will be considered.</p>
<p><b>Recreational vehicle uses:</b> Concerns: total number of allowable vehicles; storage of many vehicles on properties could become unsightly.</p>	<p>Recreational Vehicle Uses occurs when an RV is intended to be occupied for more than 6 months. Vehicle and Equipment Storage means a development used for the outdoor storage of RVs and other equipment and does not involve the erection of permanent structures. RV Uses is considered permitted in the Agricultural, Urban General, Tourism, and Country Residential districts.</p> <p>Section 5.6.13 states “personal recreational vehicles may be stored in country residential lots unless they are in disrepair and/or unduly interfere with the enjoyment of neighbouring properties”.</p> <p>Section 7.21 offers some regulations and controls with respect to temporary accommodations and recreational vehicle uses. The maximum number of permits issued for RVs</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
	for a parcel of land shall be 2 (unless allowed under a separate use). The Development Authority may utilize sections 5.5.8 and 5.5.9 of the LUB regarding an application or conditions of a development permit.
<b>Recycling:</b> Concerns: noise, odor, traffic.	Section 7.15 of the LUB offers some controls/regulations. The Development Authority may utilize sections 5.5.8 and 5.5.9 of the LUB regarding an application or conditions of a development permit.
<b>Storage sites:</b> Concerns: noise, odor, traffic, may be unsightly in smaller sub-divisions	Storage sites are considered discretionary in the Agricultural, Rural Industrial, Country Residential, and Medium Industrial districts. It is considered permitted in the Landfill and Composting District. Where the development is considered discretionary, public consultation will be required. Section 6.4 of the LUB offers some setback guidelines for non-operating waste storage sites. The Development Authority may utilize sections 5.5.8 and 5.5.9 of the LUB regarding an application or conditions of a development permit.
All of the above could 'unduly interfere with the amenities of the neighborhood and materially interfere with or affect the use, enjoyment, or value of neighbouring properties.'	That is correct. This is why the Development Authority reviews and assesses the potential impacts of each application on a case-by-case basis and may require additional documents from the developer to address any nuisance factors (visual, odour, noise, etc.).  In some cases, a development permit may be refused due to incompatibility or interference with adjacent lands.
<b>F.</b> What also seems to be missing is more consideration in the otherwise excellent document created by Beaver County entitled ' <a href="#">Home. Grown' April 2017. 205398 (beaver.ab.ca.)</a> The document recommended a yearly follow up to measure progress of those visions. Has that happened, and if so, could the County consider using some to those ideas and recommendations going forward.	Please note this document is no longer in effect.
<b>G. General questions</b> are raised about the calculation of the total allowable sites in a subdevelopment; e.g., why aren't school sites, community halls, churches, etc. factored in? It	The calculation is related to the density of residential development and does not include institutional or commercial developments.





EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
seems that these would have as much environmental impact as a residence.	
<p><b>H. General comments:</b> Has or will the County consider establish a mechanism to handle neighbour disputes around individual uses of a property? This area can be very problematic, particularly on smaller acreages when it comes to such matters as discharging firearms or fireworks, unsightly storage of garbage, vehicles, barking dogs, etc.</p>	<p>Neighbour disputes arise from a range of issues; if it is related to a LUB aspect, the question is whether the use or structure is compliant. If it is not a series of steps would be undertaken by the County through enforcement to address the matter.</p> <p>The LUB, animal control, and nuisance bylaws deal with many neighbour disputes. The County will be reviewing its nuisance bylaw in the near future to determine if changes are required. Notwithstanding the existing County regulations, some matters are beyond the limits of planning and enforcement legislation and must be dealt through civil action.</p>
Response 2	
As per the requirements of the Canada Energy Regulator, development in proximity to TC Energy's pipelines with potential new residents, employees, structures, ground disturbance, and crossings could warrant pipeline remediation. Consultation between TC Energy and the applicant prior to development assists both parties in determining the best course of action to proceed with potential remediation and development. This is to help prevent pipeline damage, unwarranted crossings, and identify development within proximity to the pipeline that may trigger a pipeline Class upgrade.	Because pipeline rights-of-way are registered on land titles, it is the landowner's responsibility to consult with TC Energy or other pipeline companies prior to development. When an applicant applies to subdivide their land, the County refers the subdivision application to all pipeline companies that have registered an interest on a property.
<p><b>Description of Proposed MDP and LUB Update</b></p> <p>We understand that application is for policy updates to the Land use Bylaw (LUB) and Municipal Development Plan (MDP). The LUB determines the allowed use and function of each land use within the County. The MDP is the guiding document for all planning policies within a municipality, all lower and subsequent planning documents must be in compliance with the MDP. The Land Use Bylaw and Municipal Development Plan updates do not contain any policy on development near high pressure transmission pipelines.</p>	<p>It is the landowner's responsibility to ensure compliance with any caveats on their land title (i.e.: utility right of way for pipelines).</p> <p>During the subdivision process, any oil or gas company is sent a referral package for all subdivision files. This allows the representative of the company the opportunity to provide any comments or concerns within the subdivision area.</p> <p>As part of processing future applications, the County may advise residents to contact Alberta One-Call and review their land title for any</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
	caveats to be made aware of their property's nuances. The County also has known pipelines and wells on their GIS system based on information from Alberta Energy Regulator.
Please refer to <b>Attachment 01 Pipeline Assessment Area and Prescribed Area</b> for maps that show the proposal in relation to the TC Energy pipeline assessment area and prescribed area, which the following recommendations apply to.	Thank you.
<p><b>Assessment of Proposed MDP and LUB Update</b></p> <p>The MDP and LUB updates were reviewed, and do not appear to contain any maps, statements or policies related to development in proximity of pipeline infrastructure. Therefore, TC Energy recommends the inclusion of the maps, statements and policies detailed in the recommendations section below.</p>	<p>The MDP has policy within Section 5.0 Resource Extraction regarding safe planning around pipeline and facilities as well as encouraging remediating abandoned well sites and pipelines. This section outlines policy that states the County must follow the Alberta Energy Regulator's regulations and guidelines which includes statements related to development in proximity to pipeline infrastructure.</p> <p>Because maps regarding pipeline infrastructure are constantly changing, it would be impractical to include a map that is current with pipeline infrastructure into a statutory document. Please also refer to comments noted above.</p>
<p><b>Recommendations</b></p> <p>Based on a review of the existing LUB the following list represents TC Energy's recommendations for inclusion in the new plan to ensure safe development adjacent to pipeline infrastructure:</p> <ol style="list-style-type: none"> <li>1. We recommend that TC Energy's pipelines (and any other pipelines) and facilities be indicated on one or more maps within the LUB and the MDP.</li> <li>2. To ensure that all development within the Pipeline Assessment Area is referred to TC Energy for review and comment, we recommend inclusion of the following policy in the MDP and LUB:</li> </ol> <p><i>"When an area structure plan, an outline plan, a concept plan, a subdivision application</i></p>	<p>Please refer to above comments regarding the specificity of the request.</p>
	<p>Section 5.0 has been updated to include area structure plans, outline plans and conceptual schemes (5.9) and subdivisions (5.11) in the MDP. LUB has been amended to reflect TC as a referral agency when development permits are with the pipeline assessment area.</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p><i>or a development permit application is proposed that involves land within the pipeline</i></p> <p><i>assessment area, as demonstrated in Map #1 Development Plan Area, Beaver County</i></p> <p><i>Administration shall refer the matter to the pipeline operator for review and input."</i></p>	
<p>3. To ensure that developers and landowners are aware of the requirement for written consent by TC Energy for development within the 30m prescribed area, we recommend the inclusion of the following policy in both the MDP and LUB:</p> <p><i>"All development within 30m or crossings of a pipeline shall require written consent from the pipeline operator and is the responsibility of the applicant to obtain prior to any development approval."</i></p>	<p>Please refer to the policy contained in Section 5.0 where the County recognizes its responsibility regarding the AER setback regulations and has been amended to include the written consent requirement (5.7).</p>
<p>4. To support compliance with Canada Energy Regulator requirements, when a planning, policy, land use / zoning, subdivision or development application is received that involves land within up to 400 metres of an oil or gas pipeline right-of-way, Administration shall refer the matter to the pipeline operator for review and input prior to approval.</p>	<p>Referring subdivision applications to the Alberta Energy Regulator and operators has already been established as a part of the County's subdivision application process. When the County refers the application, the AER reviews and provides input on the application.</p>
<p>5. Landowners are encouraged to collaborate with pipeline operators prior to submission of an application concerning lands that are within up to 400 metres of pipeline infrastructure (the "pipeline assessment area").</p>	<p>All of these aspects should be addressed through the referral process and is also the responsibility of individual owners relating to the covenant registered on their titles. This is particularly important regarding temporary structures that do not require a development permit. It is recommended that TC work with the County on providing information for landowners regarding their responsibilities around oil and gas pipelines/wells located on their property.</p>
<p>6. As per Provincial and Federal regulations, all ground disturbance or development within 30 metres (the "prescribed area" or "controlled area") or crossing a pipeline shall require written consent from the pipeline operator and is the responsibility of the applicant to obtain prior to construction.</p>	
<p>7. No buildings or structures shall be installed anywhere over a pipeline right-of-way.</p>	
<p>8. As part of plan preparation at all stages, applicants shall identify the location of all pipeline systems within the plan area as well as their associated setbacks as applicable based on federal, provincial or pipeline operator specifications.</p>	



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p>a. Permanent buildings and structures (i.e. including a foundation or anchored to the ground) shall be located a minimum of seven (7) metres from the edge of a TC Energy right-of-way, or twelve (12) metres from the pipeline, whichever is greater.</p>	
<p>b. Temporary or accessory buildings (i.e. without a foundation and not anchored to the ground) shall be located a minimum of three (3) metres from the edge of a TC Energy right-of-way.</p>	
<p>9. Oil and gas pipeline rights-of-way should be preserved as passive open space. A crossing and encroachment permit/agreement must be approved by the pipeline operator for ongoing activities such as mowing or maintenance of the right-of-way.</p>	<p>The County GIS web mapping through the guess services provides this information, however, it is recommended to confirm with AER – One Stop web site that provides greater accuracy and updates.</p>
<p>Additional best practices and guidelines for development adjacent to pipelines in the land use planning process are included within <i>Attachment 02 TC Energy Living and Working Near Pipelines.</i></p>	<p>Thank you for the information.</p>
<p><b>Conclusion</b></p> <p>Please continue to keep us informed about this project and any future policy, land use, subdivision, and development activities in proximity to TC Energy's pipelines and facilities. Referrals and any questions regarding land use planning and development around pipelines should be sent to <a href="mailto:tcenergy@bastudios.ca">tcenergy@bastudios.ca</a>. Thanks again for providing us with the opportunity to provide comments on this project and we look forward to working with you in the future.</p>	<p>The County will have provided notification to you on the public hearing regarding the proposed updates and responses to your submission.</p>
<p><b>Response 3</b></p>	
<p>Following are some queries/comments regarding the proposed LUB/MDP documents. These documents (especially the LUB) tend to be quite confusing and are not really user friendly, and one ends up constantly chasing back and forth throughout them to try to get a proper and clear understanding of almost any concern/issue. Trying to get a clear and accurate interpretation is very difficult, and very few people will have/take the necessary time to do so. Since receiving these draft documents, we have definitely not had the time, nor hired professional consultants, to thoroughly go through them, and</p>	<p>Thank you for your comments – these documents can be challenging, and it should be noted that the County has not taken an overall rewrite of the documents but rather focused on specific sections and improving the overall layout and definitions to improve the existing status quo.</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p>as such have had to focus primarily on the "Agricultural and Rural Industrial Districts" (as they apply to our operation), and pick and choose certain topics and issues to examine; therefore, some of our comments may not be entirely accurate, and as such are subject to further enlightenment/correction should that be necessary.</p>	
<p>Although presumably there was an attempt to simplify the documents, there appears to be a lack of clarity and consistent rationale used in many aspects, and a lot is left up to interpretation, discretion, etc. From both of our many years working in relevant occupations/positions, we are both aware of the fact that consistent and accurate/proper interpretation of legislation, and fairness, consistency, and equality in the application of discretion in themselves are hard to achieve. That is one of the reasons why we have a legal system, and to unduly force people to have to access the Court system, at their own expense, for them to try to achieve these goals is unrealistic and unfair.</p>	<p>Thank you for your comments and while this process was focused on specific sections to update and the layout, the County will continue to monitor and review these documents as they continue to seek on improving what are complex processes for the community. Land use decision making is complex and therefore requires latitude in the decision-making process. However, the County encourages all members of the community to reach out to administration when they are considering development on their lands to discuss the process and the reason behind why it is required. Whatever regulations are created will never please everyone, however, their purpose is to mitigate, remedy or avoid an impact on the community.</p>
<p>In our opinion much in these documents amount to unduly and largely unnecessary detailed micromanagement and over regulation and tends to stifle a property owner's ability to use their own knowledge, free will, skills and ideas on what they want to do with their property, or how they want to run their operation/business. Individuality, common sense, innovation, self-reliance and operating within the limits of their personal financial situation, available manpower, and the state of the economy etc., must always be taken into consideration.</p>	<p>The intent of the MDP is to direct the future direction of the County over the next 20 years and is a tool to transition existing land uses to potential other lands uses. The LUB is one of the tools a municipality uses to work towards achieving the goals and objectives established in the MDP. There are many challenges with this as landowners are only looking at their specific property vs the bigger picture. A key purpose of the LUB is to establish regulations that shape a community or seek to mitigate, remedy or avoid an impact on the community. These impacts include the impact on the fiscal resiliency of a community – meaning does the development result in greater management of assets to the County that is greater than the taxes paid to support the infrastructure. In some cases, an individual's development of their lands may not have an impact but if others do the same it can result in a cumulative impact on a community. Hence, it is a fine balance of enabling economic</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
	growth, protecting the environment, and managing the fiscal impacts of residents' taxes
A cookie cutter and “one size fits all” approach is not realistic in the real world – we are all individuals and have little to no control over global, much less local politics. Everyone’s circumstances change over time and therefore adjustments often are necessary. For several reasons everyone’s world has been totally turned upside down in less than the last five years, and the whole world is dramatically shifting without most people even being aware of it yet. The world that we, and many other people, are envisioning and looking forward to living in, is a world with far less bureaucracy and excessive taxation; and one based on humanitarianism, not constant control, division and conflict.	The intent is not to create a cookie cutter approach but rather creating a plan that manages the impacts on the wider community or environment. Everyone has varying views on what is acceptable and the tools of the land use bylaw seek to create a level of certainty around what is permitted vs other uses that are classified as discretionary with the aim to balance the intent of enabling development while taking into consideration adjacent landowners.
<p>Below are a few examples of concerns we have with these draft documents:</p> <p>For instance, on our farm pursuant to your category “Agricultural Operations Primary”, we can grow berries, vegetables, herbs, spices, etc., according to your definitions on page 143. Are we permitted to grow these agricultural field crops in a greenhouse on our farm? Yet “Green Houses and Plant Nursery” appear Discretionary in the 4.4 Summary Table for “A”. We read the description for Green Houses and Plant Nursery on page 149. However, Discretionary Use - Green Houses and Plant Nursery appears to limit us to only “outside” growing of our potential products? This appears to limit the flexibility of farmers to make decisions about their own operations. Are you implying Green Houses and Plant Nursery is only for Commercial Operations? Are Agricultural Farms not Commercial Operations? Perhaps the intention was store-front type greenhouses, but, in our opinion, as it is currently proposed the LUB categorization stifles farmers from even exploring, setting up a greenhouse, and/or testing whether it would be a viable addition\diversification to their current farm operation.</p>	This is purely one definition covering agricultural operations that is related to a specific type of agricultural practice and needs to be put in context to the others agricultural uses outlined. Green Houses and Plant Nurseries are intended to be larger commercial operations and identified as a separate use due to the impacts such development may have on neighbouring landowners and county infrastructure. For clarity, we will revise the term Green Houses and Plant Nurseries to Commercial Green Houses and Plant Nurseries and add Personal Green Houses to Accessory Buildings. Therefore, a green house used for personal uses can be permitted as accessory to a use.





EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p>On 4.4 Summary Table there are a lot of blank boxes (e.g., under RI, Greenhouses and Nursery is blank) – exactly what does that indicate? We realize the main purpose of this table is to indicate whether various uses are permitted or discretionary, however, blank boxes don't help convey other information that could/may be helpful to the reader. We have an RI centered within our 5 quarters of land. It is part of our Agricultural Operations Primary. We have a water license for irrigation attached to the RI; your designations appear to limit our abilities to have flexibility in our future potential plans. Should we wish to move/build a greenhouse or even a cottage on this integral RI part of our "Agricultural Operations Primary" we appear to be limited by your Use categories. Is it intended that the blank "boxes" in this chart indicate "exempt" or "not allowed"? Those two terms are utilized in some of the "boxes" on the chart on page 97 in subsection 7.16; this certainly helps to clarify the matter in that case.</p>	<p>If the box has no indication, it means the use is not allowed – this has been updated to reflect this interpretation. It should also be noted that typical farm buildings are exempt from requiring a development permit if they meet the required setbacks in accordance with the Agricultural Operation Practices Act. Farm buildings are defined as those that will be of low human occupancy which means the presence of people is minimal. These farm buildings are only used for the housing of livestock, and/or the storage, sorting, grading of agricultural products that have not undergone secondary processing and/or the storage or maintaining of machinery, equipment or vehicles that are used in connection with the growing of farm crops or the care of farm animals. This does not include additional commercial operations that some farmers may have which would require a development permit.</p> <p>Other agricultural farming practices are also not governed through the LUB but rather the Agricultural Operation Practices Act through the provincial government.</p>
<p>3.2 discusses Development "Not Requiring a Development Permit", and 3.2.1.h. discusses "extensive agricultural purposes". We find no definition for "extensive agricultural purposes". Is h. referring to Agricultural Operations Primary? Unclear. Considering 3.2.1.h(iii) where do we stand with many non-permanent type of farm buildings, such as skid style granaries, whether metal or wood. These can often get moved between different quarters of land as use requires. The LUB again appears to be unnecessarily limiting flexibility within our farm operations.</p>	<p>Extensive agricultural purposes have been consolidated into Agricultural Operations, Primary. To avoid confusing any reference to extensive agricultural purposes have been changed to Agricultural Operations, Primary. All developments that have obtained a development permit will be considered to be in compliance (assuming you built as per what was approved in your permit with respect to size, specs, and location). If you or the future landowner of that parcel would like to expand upon an existing development or if the building is destroyed and you would like to rebuild (both which may require a new development permit), the development would be considered new and would be required to be in compliance with the LUB, or a variance to the LUB may be requested as part of the application.</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
	Your development would not be contravening the LUB so long as permits were obtained when you initially added it to your lands.
3.2.1.p – and 7.16.3 Shipping containers. Why does the length of a shipping container on our farm matter to the County with regards to requiring a development permit? Whether it is 45' or 53' in length is our business decision, as to what is the best use of our \$ invested, without limitations being imposed, apparently arbitrarily, to our farming operations.	The scale of a structure can become obtrusive landmark depending on its location within the property and this regulation has not changed from the previous bylaw. Please note that a variance could always be sought to locate a larger shipping container subject to the approval of the County.
7.16.9 also, the limitation of the numbers of containers. Only 2 are exempt; we currently have 4, ideally, we need more, but perhaps now we would need to apply for a development permit under Permitted/Discretionary Use. Again, you are limiting our freedom of personal flexibility to adapt to the environment in which we must now live. "Your discretion", not ours, now controls our decision.	The inclusion of containers on a property are viewed by some as being unsightly and hence the purpose of requiring a development permit is to assess what the potential impact may be on the surrounding community. While you have certain rights to the development on your land this does not negate a responsibility of managing the land in a manner which respects the surrounding environment and community. Hence, the purpose of a LUB is balancing the uses on a property and their impacts on the surrounding community and beyond.
Our farm location is right beside the two huge Class 1 and 2 landfills, the Ryley/County Industrial Park, the CN mainline track together with a 2-mile-long siding that often causes our primary/direct Highway 14 driveway to be blocked continuously for hours, (and on occasion days on end). This siding often appears to be used just as much as a "parking stall" as it is as a "high-speed passing lane". On many occasions we have been blocked by as little as half of an engine and/or car, and the engineer, upon request has refused to move, even though we had ascertained there was lots of room for them to move. To be fair, on one occasion the engineer disconnected the engines briefly to let us pass with the tractor and bale wagon; and other engineers have (when their overall length permits) stopped their engine/last car literally just before/past our crossing so we can cross. These types of concerns should be brought to CN's attention during the County's future project negotiations to ensure their staff	Thank you for your comment that will be passed onto Council. The LUB has not have control over railways that is governed at a federal level.



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
are doing their level best to be "good neighbors".	
Yes, we have an alternate access that was provided by CN when the siding was installed, but that requires a "5 MILE round trip" to get back to where we started from. This includes over ½ mile (one way) of this being on Highway 14 – which is dangerous at night (short winter daylight hours) when hauling 10' wide loads of bales behind a slow-moving tractor. We have already been side swiped once on the highway that wrote off our round baler and the other driver's pick-up truck. Fortunately, no one was injured. We stay off the highway as much as possible, day and night. These issues have already significantly negatively affected our use and enjoyment of our farm, and undoubtedly also devalued our farm from the perspective of it most likely not being viewed by buyers as potentially being a very attractive farming investment opportunity. These realities (and now our age) are factors we must and have used/considered since 1992 (the year the BRWMSC's landfill began to transition from a "local County landfill" to its current huge commercial operation) when deciding whether to build permanent buildings or buy containers etc. that can be sold and moved off after we leave or die.	Please refer to previous comments on CN railway lines.
The decision on how many and what length of containers we can buy and set up in our yard site should be ours to make freely. Having containers to sell appeared to be a better utilization of our capital. Shipping containers are kept in our yard, rather than spread over our 5 quarters of land for security purposes as we have had many break-ins/thefts at/from our other quarters. Industrial Districts appear not to be limited to the same degree regarding shipping containers, but larger land bases like Agriculture are?	Please refer to previous comments on shipping containers.
Our quick read through of the documents does not specifically provide clarity regarding the possibility of potential retroactive requirements. But, either way, we will now have to look at when we bought our shipping containers, and the implications of these changes, once we receive	In relation to retroactive requirements, if you have established a building or a shipping container on the site and complied with the regulations of the day and/or obtained the required permits and are no longer in



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
clarification of retroactive application of all, or parts of these documents.	compliance with the adopted land use bylaw, then the existing structures/buildings would be considered non-conforming. This means that the development will be allowed to continue unless the provisions of Section 3.3 of the LUB apply.
One of the shipping containers we utilized for our grid-tied solar array, with all permitting done by the contractor, with inspections completed and approved, etc. As presented in the draft LUB it would not fall within 7.16.2 Shipping Container guidelines. Again, business decisions we made to ensure that upon us leaving the farm, dying, etc., the solar array could be either moved with us, or sold as a unit, and moved off the property. So, where does the draft leave us now, are these new requirements potentially going to be "discretionally" deemed retroactive, etc.?	Please refer to previous comment.
Screening 6.10.14. What are the screening requirements for Agricultural Operations Primary? We make business decisions to purchase spare older machinery and equipment to salvage for material and parts as required. So, we have a lot of valuable inventory. Valuable to us. John has a lot of mechanical skills and experience, welding, etc. It saves us a "lot" of money to be able to fix our own equipment on the farm. New parts for older machinery are becoming harder and harder to locate.	<p>The use of old machinery and equipment may be permitted on a site, the LUB is not saying this situation cannot occur, however, every situation is different and there may be impacts arising. These impacts could relate to:</p> <ol style="list-style-type: none"> <li>1. Creating an undesirable visual appearance based on the size and location of the machinery and equipment which may lead to requirements to assist in mitigating, remedying or avoiding an impact.</li> <li>2. Old machinery and equipment have metals and other chemicals which through weathering may lead to contaminating the ground or water sources that affects others in the area.</li> </ol> <p>Hence, for the reasons outlined above the municipality would assess an application of this nature to ensure others within the community are not adversely impacted. In context to 6.10.14, it relates specifically to properties adjacent to provincial highways where there is guidance on the nature of screening options that you would include in an application to the County to assess. The objective is to reduce the</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
	visual presence of outdoor materials from the public realm.
The Draft appears to be adding potential additional costs to either screen a lot of areas of our farm, or waste precious time and energy to move and relocate equipment, etc., to soothe people with sensitive eyes who cannot cast their eyes to the other side of the highway, if our operation offends them. We see a lot of our equipment as historical and valuable. Would the requirements potentially imposed on us and many others like us be the same as those imposed on, perhaps, a County Councilor or other politician, or perhaps even a higher-level civil servant? Discretion can be a double-edged sword that is quite often wielded very differently depending upon who is on the receiving end.	As referred to above, each site is different and therefore needs to be assessed to understand the impacts. Because a public road is within the public realm, it is a part of the character of the community, therefore those who live in the community are affected by uses that visually impact the wider community. Additionally, it is important to consider other land users along the road corridor whose development rights could be affected by the visual changes arising from certain uses. It should be noted that these provisions were in the original land use bylaw and have not changed.
We see in a few Industrial Districts stated, "This district shall not contain a biomedical waste facility." For clarification, in which district(s) would you permit a biomedical waste facility? Where would it be located – it could seem a land location may already have been identified since so many locations are already explicitly excluded? Our concern is that Council might cave into Provincial requests/pressure, much like they appear to be doing by passing the buck of responsibility for Telecommunication Towers off onto the Federal Government. In hindsight Wainwright appeared to have fallen into a similar trap regarding their biomedical waste facility and were not saved/protected by Provincial Regulatory oversight, regulation and enforcement, or lack thereof.	At this time there is no "Biomedical Waste Facility" noted as a use in the LUB and therefore it is no a permitted use.  No applications for a Biomedical Waste Facility have been received in 2023, and at an administrative level, there has been no communications regarding any potential applications to be received.
The position taken on Telecommunication Towers illustrates council would be clearly ignoring information provided in the BioInitiative Report regarding EMF issues. Council cannot unilaterally abdicate itself from that responsibility. An informed Council would advocate for protection of their overall environment, including ratepayers close to any of these facilities. It is easy to state it falls under the sole jurisdiction of the Federal Government. However, an educated and readily defensible position to take would be include an	Telecommunication towers are governed by federal legislation and the municipality does not make the decision on the infrastructure which is processed by Innovation, Science and Economic Development (ISED). However, the agency does require all applicants to refer their applications to the relevant municipality for input and this is where the MDP policy provides direction to infrastructure uses regarding the level of engagement expected to be carried out (Section 14.0 of the MDP). The County issues a letter of



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p>amendment in 14. "Telecommunication Towers" in the MDP that states: "The applicant shall only install equipment with biologically healthy frequencies and not harmful frequency bandwidths." That would be a minimal stance to take. There is no excuse – could/would not making such a requirement amount to negligence and accountability?</p>	<p>municipal cooccurrence upon completion of the engagement process.</p>
<p>The amendment would also be in alignment with your own MDP - Vision and Goals at 2.0 clearly states "encouraging environmentally sound, sustainable economic development." The EMF experts (i.e., Barry Trower etc.) know which are safe and readily available. Protect the local environment, bees, birds, mammals, humans, etc. There is plenty of peer reviewed research on this topic that cannot be ignored. Conclusions from the BioInitiative Report 2012, BIOINITIATIVE 2012 – CONCLUSIONS Table 1-1 states, "Overall, these 1800 or so new studies report abnormal gene transcription (Section 5); genotoxicity and single-and double strand DNA damage (Section6); stress proteins because of the fractal RF-antenna like nature of DNA (Section 7); chromatin condensation and loss of DNA repair capacity in human stem cells (Sections 6 and 15); reduction in free-radical scavengers – particularly melatonin (Sections 5, 9, 13, 14, 15, 16 and 17); neurotoxicity in humans and animals (Section 9), carcinogenicity in humans (Sections 11, 12, 13, 14, 15, 16 and 17); serious impacts on human and animal sperm morphology and function (Section 18); effects on offspring behavior (Section 18, 19 and 20); and effects on brain and cranial bone development in the offspring of animals that are exposed to cell phone radiation during pregnancy (Sections 5 and 18). This is only a snapshot of the evidence presented in the BioInitiative 2012 updated report." <a href="https://bioinitiative.org/conclusions/">https://bioinitiative.org/conclusions/</a>, accessed 20231122.</p>	<p>In relation to the comments provided the County could:</p> <p>Defer to the federal government regarding safety for humans and the environment (both of which are dealt within Safety Code 6 and Impact Assessment Law); or</p> <p>Defer to this Bioinitiative Report to determine which equipment and frequencies are acceptable, and ultimately get overruled by Innovation, Science and Economic Development (ISED).</p>
<p>The County should mandate that wherever possible that the fiberoptic cable that was laid years ago between the CN tracks and Highway 14 be utilized to the maximum to keep the need</p>	<p>Item is sperate to the LUB regulations and noted to bring forward to Council.</p>





EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
for additional telecommunication towers to a minimum.	
In your MDP 5.8, it states, "The County should encourage the AER and the oil and gas industry to remediate abandoned well sites and pipelines." We request that the word "should" be replaced with the word "shall", and that a time frame for completion of the remediation be identified as being linked to the conclusion of the well site and/or pipeline being actively operated. Remediation projects are generally very costly projects. Significant penalties/fines should be clearly identified which should be imposed annually until cleanup is done to the County's and property owner's satisfaction and legal agreements. These huge multinational corporations have the deep pockets to clean these sites, and they received access to, and for, the resource itself at minimal cost.	The policy uses "should" because the Municipal Government Act exempts certain oil and gas developments from a development permit. The County would not be able to change the wording to "shall" since the AER and the oil and gas industrial is the Provincial government's responsibility to enforce remediation and it would not be in the County's jurisdiction to do so.
Oil apparently is the second most abundant "fluid" on earth (next to water) and is formed by natural bacterial processes – not decaying dinosaurs as we have long been led to believe. It was also our understanding that near the onset of the recent COVID Plandemic former Premier Jason Kenny negotiated a release of Federal Funding from PM Trudeau to reclaim abandoned well sites in Alberta as part of the Federal/Provincial COVID negotiations. How much money did Alberta receive and how many well sites were reclaimed with that money? Specifically, how many well sites were identified, and of those how many were reclaimed in Beaver County?	This is a separate item to the MDP and LUB. However, it will be raised with Council as a follow up response.
Beaver County, among others, should hold the Province accountable and responsible for those entire costs, not the local ratepayers bearing the overall liability. This should be one of the top priority financial issues rather than pressuring local lot owners regarding their lot remediations. Where is the fairness/discretion, and which issue would potentially produce the greatest financial benefit/profit and environmental improvement to the County as a whole?	Refer to above comment.
The term "abandoned" as it has been/is used with regards to many issues (i.e., over and	The term abandoned is only used in reference to oil and gas setback outlined under section 5.8 of the MDP. This term is used by the Alberta



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
above well sites and pipelines) needs to be clearly defined in the MDP as well.	Energy Regulator (AER) relating to a wellhead that is no longer in operation. The term is used to maintain consistency with the language used by AER.
We also request that the “definition” and/or “glossary” sections of both the LUB and MDP documents be moved near the beginning of the bylaw rather than being stuck somewhere near the end of it. This would make it more similarly drafted to what is historically done in other Acts and Regulations. Readers would then readily find and be aware of these sections when they first open the document and be able to quickly peruse them before moving onto the main part.	The reason for moving the definitions section to the rear is from a functionality point of view. Most people found it frustrating to go to a section that then move to the front of the document vs being on a section an easily moving to the rear to identify a definition. The intent will be to also have an online version where the definition will be easily accessed.
Additionally, we have been contacted by Shell regarding obtaining access to our land for testing with regards to their Carbon Capture program. A primary concern we have in this regard is what setback/buffer zone requirements are in place to ensure that there is no seismic activity of any type being permitted within a specified distance of all the landfill sites and their monitoring wells. Seismic activity near landfill cells could cause cracks in the clay landfill liners, and possibly even cause damage to the synthetic liner. Should that occur leachate from the landfill cell could leak out, and it could end up being almost impossible to repair the problem. Such a problem could lead to massive liability concerns, and it could be very difficult to hold any party liable for cleanup and repairs etc. The County must address this issue before any seismic testing is done to ensure the County does not end up being the fall guy stuck with the liability and cleanup bill.	Thank you for your comment, this is regulated by the Alberta Energy Regulator and not by the municipality.
Rest Areas – Highway 14  We also have another concern that we feel should be dealt with in these new proposed bylaws – that being the lack of rest areas for highway travelers etc. This could be included under the heading of Campgrounds. Highway 14 used to have several campsites and rest areas between Edmonton and Viking. Most have disappeared or have been discontinued.	The municipality has no jurisdiction of highways. Development within highway rights-of-way must be approved by the provincial government.



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p>There used to be a site on the south side of Hwy 14 just on the east side of Amisk Creek that had a cookhouse, outhouse(s) and a reasonably decent sized area for turning around and parking that did not interfere with highway traffic. There should even be an area just east of the creek itself that would be conducive to overflow parking if need be. This site was removed due to lack of funding sources and volunteer support – i.e., gov't and local service clubs etc. It appears the site is still owned by some level of gov't as there is often various equipment using the site etc. We have 1 ½ miles of Hwy 14 cutting through our farm and have, for years, had problems with people stopping to relieve themselves, leaving their “fertilizer/paper” and garbage right inside our property line on several of our approaches, including our main yardsite driveway. Some even drive out into the fields and/or up to the old yard sites. We caught one elderly couple from Wainwright who drove behind some caraganas etc. – they admitted this was their “regular” stopping spot when travelling between home and Edmonton. On many occasions we encounter people stopping and catching a nap in their vehicles on the approaches or out on the land itself. Often, we must wake them up and ask them to move so we can access our own fields with our farm equipment etc. We believe there is a rest area near Viking, however, we are not aware of any other obvious sites between that site and the west end of the County. We request that the Amisk Creek site be re-instated and that some of the “community benefit funding” from the two landfills be allocated for this purpose.</p>	<p>This property is owned by the province. Should you wish to propose such a use for the land, Beaver County would recommend that you reach out to the landowner directly and is a separate matter from the MDP and LUB update. Please contact County administration for further clarification and potential assistance on this matter.</p>
<p>Quite frankly Claystone could certainly supply one garbage dumpster at no cost as partial token compensation for all the waste that flies out onto the highway and local farmer's land from all their trucks. Two portable toilets could be funded by the community benefit funding program. The County has graders and grass cutting units that could look after the general basic landscaping type work. We see no need to provide a cookhouse or other permanent structures. Other far more rural counties have</p>	<p>See previous comment.</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
rest areas; for instance, Flagstaff County has an excellent site south of Alliance close to the river that is very well kept and attractive for everyone to use. It could use better signage for out of area travellers.	
As a side note, on November 20, 2023 an unoccupied vehicle was backed into our primary driveway for almost the entire day which made it very unsafe for us to try to get past in order for us to haul two stock trailer loads of calves to the Viking Auction.	The item does not relate to the MDP or LUB but rather enforcement. We recommend contacting the County administration to discuss how they could assist in addressing this in the future.
<p>Signs.</p> <p>We had some points we wanted to review farther with regards to signing along highways. Over the years we have had personal involvement and interaction with Alberta Transportation and other parties in that regard. We were having to deal with telephone tag with their Vermillion office – we hadn't been able to get beyond their automated answering service and actually talk to a live person. So much for progress! Luckily at about 3:30PM today we received a personal phone call back and discovered that their department, over the past while, has had some serious revisions to their approach to dealing with the signage issue. This individual expressed that we had legitimate concerns over this issue. At this point, lacking the time to fully evaluate this newest information, we will not dwell on it further at this time.</p>	Thank you for your comment. All signs within provincial highway road allowances are at the discretion of Alberta Transportation.
<p>Comments:</p> <p>As previously mentioned, we are very concerned regarding the potential selective enforcement and interpretation of the LUB and MDP. We are also concerned about the potential for these documents to create landowner friction/conflicts that possibly never would have materialized without the existence of these detailed and restrictive bylaws. How much of the present enforcement of these various bylaws are/have been initiated and or carried out as a result of public complaints being submitted to County staff?</p>	Thank you for your comment – the MDP and LUB have been operating in the County since 1980 and changed over the years. The specific changes identified by Council and administration are actually seeking to remove and create greater flexibility in the documents than what currently exist today.



EMAILED COMMENTS																									
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required																								
<p>We apologize for the delay in getting our response in earlier, however, we have been very busy and quite frankly it takes a fair bit of time to digest these large documents and work through them and prepare a decent response.</p> <p>We would appreciate a written response on these issues.</p>	<p>We appreciate your responses and have attempted to provide responses that are applicable to the documents that has involved updates to specific sections and a general clean up of the existing documents.</p>																								
<p>We are still patiently waiting for a written response to our questions with regards to 20230405 Claystone Hearing on Material Change to its Business Plan.</p>	<p>This comment will be passed on to the County.</p>																								
Response 4																									
<p>Our review was done using a public health lens that includes considerations for the design of healthy communities based on five health aspects: healthy neighbourhood design, transportation networks, natural environments, housing, and food systems. The content of this letter includes a review of how these considerations are incorporated into the referral and any associated recommendations. These concepts are part of the 2018 Healthy Built Environments Linkages Tool Kit.</p>	<p>Thank you for your submission and comments.</p>																								
<p>Community Context: According to the 2021 Canada Census, from 2016 to 2021 the population within Beaver County, including the towns of Tofield and Viking, the villages of Ryley and Holden and the Hamlets of Kinsella and Bruce, the population shrank by 1.8% overall. The average age of the population in each of the communities and the county in general is older than the Alberta average of 39, ranging from 42-50.</p> <table border="1"> <thead> <tr> <th></th> <th>Satisfied with their health</th> <th>Satisfied with life</th> <th>Satisfied with how safe they feel</th> <th>Good social relations with neighbours</th> <th>Engaged in community associations</th> </tr> </thead> <tbody> <tr> <td>Tofield</td> <td>84</td> <td>90</td> <td>97</td> <td>82</td> <td>46</td> </tr> <tr> <td>Viking</td> <td>89</td> <td>92</td> <td>99</td> <td>94</td> <td>73</td> </tr> <tr> <td>Alberta Average</td> <td>86</td> <td>92</td> <td>94</td> <td>83</td> <td>45</td> </tr> </tbody> </table>		Satisfied with their health	Satisfied with life	Satisfied with how safe they feel	Good social relations with neighbours	Engaged in community associations	Tofield	84	90	97	82	46	Viking	89	92	99	94	73	Alberta Average	86	92	94	83	45	<p>Thank you for the information.</p>
	Satisfied with their health	Satisfied with life	Satisfied with how safe they feel	Good social relations with neighbours	Engaged in community associations																				
Tofield	84	90	97	82	46																				
Viking	89	92	99	94	73																				
Alberta Average	86	92	94	83	45																				
<p>The MDP's three goals are the conservation of agricultural land and encouragement of diversity in the agricultural and services sectors;</p>	<p>Thank you for your comments.</p>																								



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
preservation of wildlife habitats and environmentally sensitive areas; and the provision of the infrastructure necessary to encourage sustainable, environmentally sound, and economic development. These goals align with the concepts of healthy natural environments and healthy food systems.	
Natural Environments: A built environment where natural environments are protected, and natural elements are incorporated and are experienced by and accessible to all. According to the provincial Community Health Surveys from 2014-2018 and 2018-2022, in Tofield and Viking 80% of residents agree they have accessible walking paths and green spaces, yet in those same communities 73 and 72% of residents are not getting sufficient activity.	Thank you for the information, however, the County does not manage these communities. Tofield is governed by the Town of Tofield and Viking by the Town of Viking.
Section 11 of the MDP- Environmentally Sensitive Areas speaks specifically to the priorities to conserve lands with important wildlife habitats or unique flora; minimize conflicts with non-compatible uses; and restrict development in areas susceptible to flooding, groundwater contamination or affect groundwater flow. Strategies mentioned to protect environmentally sensitive areas (ESAs) include restricting development, the use of buffers, easements and municipal reserves, retention of treed areas, and stormwater management that utilize existing or naturalized systems.	These are objectives the County aims to implement where possible within their jurisdiction and authority enabled under the Municipal Government Act and/or in collaboration with other agencies.
Diverse ecosystems have been shown to be more resilient and able to recover from a variety of natural and human induced stressors (i.e., climate change, forest fire, urbanization). Ensuring the preservation of environmentally sensitive areas and connecting human populations with natural environments can help protect existing ecosystems and promote a healthier human population.	Utilizing the tools enable under the Municipal Government Act, the County seeks to protect these resources. It should be noted the provincial and federal agencies are the main regulators for these assets.
Sections 5, 7, 11 and 15 of the MDP each mention stormwater management. AHS supports environmental sustainability providing a means of natural rain/ stormwater management and recommends that the stormwater management ponds be constructed to meet the capacity of the 1:100-year 24-hour storm.	Thank you for your comment – this would typically be reflected in the County's engineering design standards that would align with provincial standards.



EMAILED COMMENTS																																																													
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required																																																												
<p>The MDP contains flexible language around the circumstances as to when and Environmental impact or site assessment, Biophysical Assessment, or wetland assessment would be required. AHS-SHE supports the requirement for these types of assessments for any developments within or which could negatively impact ESAs.</p>	<p>Thank you for your input.</p>																																																												
<p><b>Housing:</b> Affordable, accessible, and good quality housing for all that is free of hazards and enables people to engage in activities of daily living while optimizing their health.</p> <p>The majority of homes within the MDP area are single family dwellings, including detached, semi-detached and movable dwellings. The table below shows the types of dwellings by type by percentage of representation.</p> <table border="1"> <thead> <tr> <th></th> <th>Single family dwelling</th> <th>Row house</th> <th>Duplex</th> <th>Apartme nt</th> <th>Movable dwelling</th> </tr> </thead> <tbody> <tr> <td>Beaver County</td> <td>90.6</td> <td>0</td> <td>0</td> <td>0</td> <td>9.2</td> </tr> <tr> <td>Tofield</td> <td>80.8</td> <td>3.7</td> <td>0</td> <td>11.1</td> <td>3.1</td> </tr> <tr> <td>Viking</td> <td>88.4</td> <td>3.5</td> <td>0</td> <td>0</td> <td>8.1</td> </tr> <tr> <td>Ryley</td> <td>75.5</td> <td>0</td> <td>0</td> <td>6.7</td> <td>17.8</td> </tr> <tr> <td>Holden</td> <td>91.1</td> <td>0</td> <td>0</td> <td>5.9</td> <td>2.9</td> </tr> <tr> <td>Alberta Average</td> <td>67</td> <td>7.8</td> <td>2.7</td> <td>19.7</td> <td>2.8</td> </tr> </tbody> </table> <p>The majority of residents own their home.</p> <table border="1"> <thead> <tr> <th></th> <th>Beaver County</th> <th>Tofield</th> <th>Viking</th> <th>Ryley</th> <th>Alberta Average</th> </tr> </thead> <tbody> <tr> <td>Owner</td> <td>90.4</td> <td>76.5</td> <td>77</td> <td>80</td> <td>88.2</td> </tr> <tr> <td>Renter</td> <td>9.6</td> <td>23.5</td> <td>23</td> <td>20</td> <td>14.7</td> </tr> </tbody> </table>		Single family dwelling	Row house	Duplex	Apartme nt	Movable dwelling	Beaver County	90.6	0	0	0	9.2	Tofield	80.8	3.7	0	11.1	3.1	Viking	88.4	3.5	0	0	8.1	Ryley	75.5	0	0	6.7	17.8	Holden	91.1	0	0	5.9	2.9	Alberta Average	67	7.8	2.7	19.7	2.8		Beaver County	Tofield	Viking	Ryley	Alberta Average	Owner	90.4	76.5	77	80	88.2	Renter	9.6	23.5	23	20	14.7	<p>The County is a large rural area that results in most dwellings being single family. The difference is located within the hamlets and the County's new LUB is providing greater flexibility for other housing forms.</p>
	Single family dwelling	Row house	Duplex	Apartme nt	Movable dwelling																																																								
Beaver County	90.6	0	0	0	9.2																																																								
Tofield	80.8	3.7	0	11.1	3.1																																																								
Viking	88.4	3.5	0	0	8.1																																																								
Ryley	75.5	0	0	6.7	17.8																																																								
Holden	91.1	0	0	5.9	2.9																																																								
Alberta Average	67	7.8	2.7	19.7	2.8																																																								
	Beaver County	Tofield	Viking	Ryley	Alberta Average																																																								
Owner	90.4	76.5	77	80	88.2																																																								
Renter	9.6	23.5	23	20	14.7																																																								
<p>In 2020, there were lower average household incomes and higher prevalence of low-income within the population compared to the Alberta average. Based on income, housing costs and the suitability of housing, there is a need for affordable and adequate housing within Beaver County. Between 18-27% of residents reported they not only spend more than 30% of their income on shelter costs but their homes were either "not suitable" or "major repairs were needed". The corresponding portion of the</p>	<p>One of the reasons for carrying out amendments to the LUB was to enable greater housing choice and size.</p>																																																												





EMAILED COMMENTS																																															
Verbatim Comments					How were the comments addressed? If they weren't, why not? *if deemed required																																										
<p>population deemed to be “in core housing need” is higher than the provincial average.</p> <table border="1"> <thead> <tr> <th></th> <th>Spendin g 30% or more of income on shelter costs</th> <th>Househo lds 'spendin g 30% + on shelter costs' or 'not suitable' or 'major repairs needed'</th> <th>Spend 30%+ shelter costs only</th> <th>Accepta ble housing</th> <th>In core need</th> </tr> </thead> <tbody> <tr> <td>Beaver County</td> <td>21.4</td> <td>26.8</td> <td>16.1</td> <td>73.2</td> <td>20.7</td> </tr> <tr> <td>Tofield</td> <td>18.6</td> <td>28.4</td> <td>16</td> <td>71</td> <td>21.5</td> </tr> <tr> <td>Viking</td> <td>18.6</td> <td>24.1</td> <td>17.2</td> <td>74.7</td> <td>17.1</td> </tr> <tr> <td>Ryley</td> <td>20</td> <td>34.8</td> <td>15.2</td> <td>65.2</td> <td>26.7</td> </tr> <tr> <td>Holden</td> <td>17.6</td> <td>17.6</td> <td>8.8</td> <td>79.4</td> <td>11.8</td> </tr> <tr> <td>Alberta Average</td> <td>21.2</td> <td>28.4</td> <td>18.6</td> <td>71.6</td> <td>9.9</td> </tr> </tbody> </table>							Spendin g 30% or more of income on shelter costs	Househo lds 'spendin g 30% + on shelter costs' or 'not suitable' or 'major repairs needed'	Spend 30%+ shelter costs only	Accepta ble housing	In core need	Beaver County	21.4	26.8	16.1	73.2	20.7	Tofield	18.6	28.4	16	71	21.5	Viking	18.6	24.1	17.2	74.7	17.1	Ryley	20	34.8	15.2	65.2	26.7	Holden	17.6	17.6	8.8	79.4	11.8	Alberta Average	21.2	28.4	18.6	71.6	9.9
	Spendin g 30% or more of income on shelter costs	Househo lds 'spendin g 30% + on shelter costs' or 'not suitable' or 'major repairs needed'	Spend 30%+ shelter costs only	Accepta ble housing	In core need																																										
Beaver County	21.4	26.8	16.1	73.2	20.7																																										
Tofield	18.6	28.4	16	71	21.5																																										
Viking	18.6	24.1	17.2	74.7	17.1																																										
Ryley	20	34.8	15.2	65.2	26.7																																										
Holden	17.6	17.6	8.8	79.4	11.8																																										
Alberta Average	21.2	28.4	18.6	71.6	9.9																																										
<p>Section 4 of the MDP- Country Residential, includes objectives that restrict residential development in areas that are not suitable due to flooding or groundwater contamination risks, incompatible surrounding uses, and the protection of environmentally sensitive areas. This aligns with AHS recommendations to minimize the residential-industrial interface and protection of biodiversity. This section prioritizes infill over additional new extensive multi-lot subdivisions and minimizing the costs of municipal servicing.</p>					<p>Thank you for your comments and the municipality understands the risks related to these issues and hence the reason for the policy within the MDP.</p>																																										
<p>AHS-SHE supports the requirement for stormwater management, assurance of sufficient water and wastewater and the requirement for an Area Structure Plan (ASP) for all multi-parcel developments with more than 3 lots. The MDP mentions discretionary requirement for a biophysical assessment and conceptual scheme for multi-lot residential developments.</p>					<p>The County has a separate bylaw relating to the management of stormwater arising from development of a property and any area structure plan, conceptual scheme or subdivision is required to show how stormwater is being managed.</p>																																										
<p>AHS-SHE supports the restrictions against new subdivisions within regulated setbacks under Section 9.6.8 of the LUB, this aligns with AHS-SHE recommendation to reduce the industrial-residential interface and prevent incompatible uses.</p>					<p>Thank you for your comments.</p>																																										
<p><b>Food Systems:</b> A built environment that can support access to and availability of healthy foods for all. In the communities of Tofield and Viking, 65 and 59 % of residents respectively are</p>					<p>The County recognizes the value of agricultural land and the important of a healthy community.</p>																																										



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p>not getting sufficient servings of fruits and vegetables daily and 20% worry about running out of food before they can afford to buy more. Eating healthy is not only a matter of personal choice, it can also be positively influenced by community environments. Balancing food expenditures with the cost of housing, transportation, and other necessities is a struggle for some people, as such locating healthy, accessible and affordable food options near affordable housing can contribute to a healthy, equitable food system.</p> <p>The MDP objectives under section 3.0 Agriculture include the protection of agricultural lands, good stewardship of the land and minimizing conflicts between agricultural and non-agricultural uses. Agricultural capacity is a key aspect of healthy food systems, some expert opinion indicates that agricultural land and workforce capacity are essential for a healthy food system, particularly at the regional or local level.</p>	
<p><b>Transportation Networks:</b> Safe and accessible transportation systems that incorporate a diversity of transportation modes and place priority on active transportation over the use of private vehicles.</p> <p>The MDP and LUB contain policies that restrict residential development near major roadways. AHS supports minimizing the residential-industrial interface, where zoning presents challenges the use of strategies like those mentioned in the plans such as the use of buffers and berms as well as trees/vegetation can aid in mitigating noise, light and odour pollution that may be generated by the activities within the commercial or industrial districts and the vehicular traffic associated. Acute effects of noise pollution include decreased sleep quality and quantity, increased annoyance, and stress. Chronic effects include hypertension, decreased learning and productivity and endocrine disruption.</p>	<p>The County covers a significant land area that provides a range of development opportunities that support villages, towns and cities. While the County seeks to create recreational facilities and trails for its residents and visitors, the ability to implement an active transportation plan or public transportation system is cost prohibitive.</p>



EMAILED COMMENTS																																																									
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required																																																								
<p>Active transportation such as cycling or walking promotes physical activity that has important health benefits, including significantly reducing the risk of all-cause mortality, cardiovascular disease, obesity, type-II diabetes, and certain types of cancer. Trails and sidewalks provide connectivity and easy access to resources and facilities through active transportation. This encourages social capital and community engagement, as residents are more likely to engage socially and trust their neighbours. This in turn supports the MDP's identified objective to support rural social structure under Section 3.0 and acknowledgement under Section 4 of the potential impact that land use has on the social, economic, and environmental welfare of its residents.</p>	<p>Please refer to the above comments.</p>																																																								
<p>According to the 2021 Census, there is variability in the commute to work needs of residents. The majority do rely on vehicular means for their daily commute, some however do use non-vehicular methods.</p> <table border="1"> <thead> <tr> <th></th> <th>Commute within community</th> <th>Commute within the County</th> <th>Commute outside of the County</th> <th>Car, truck or van</th> <th>Public transit</th> <th>Walked</th> <th>Bicycled</th> </tr> </thead> <tbody> <tr> <td>Beaver County</td> <td>16.1</td> <td>36.6</td> <td>46.3</td> <td>94.9</td> <td>0.5</td> <td>1.5</td> <td>0</td> </tr> <tr> <td>Tofield</td> <td>0</td> <td>62.1</td> <td>37.1</td> <td>90.9</td> <td>0</td> <td>7.9</td> <td>0</td> </tr> <tr> <td>Viking</td> <td>77.4</td> <td>6.5</td> <td>14.5</td> <td>84.1</td> <td>0</td> <td>13.4</td> <td>0</td> </tr> <tr> <td>Ryley</td> <td>58.6</td> <td>27.6</td> <td>10.3</td> <td>81.6</td> <td>0</td> <td>15.8</td> <td>0</td> </tr> <tr> <td>Holden</td> <td>27.3</td> <td>45.5</td> <td>18.2</td> <td>78.6</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Albertha</td> <td>71.6</td> <td>23.2</td> <td>4.2</td> <td>87.3</td> <td>5.6</td> <td>4</td> <td>0.7</td> </tr> </tbody> </table> <p>As Beaver County is predominately rural in nature, the MDP focus of Section 13 is on vehicular transportation. There is no mention of pedestrian systems in either the LUB or MDP. AHS-SHE recommends inclusion of policies that promote the incorporation of non-vehicular and pedestrian pathways throughout and between developments. These concepts may be explored through other municipal plans, such as a transportation master plan or social master plan.</p>		Commute within community	Commute within the County	Commute outside of the County	Car, truck or van	Public transit	Walked	Bicycled	Beaver County	16.1	36.6	46.3	94.9	0.5	1.5	0	Tofield	0	62.1	37.1	90.9	0	7.9	0	Viking	77.4	6.5	14.5	84.1	0	13.4	0	Ryley	58.6	27.6	10.3	81.6	0	15.8	0	Holden	27.3	45.5	18.2	78.6	0	0	0	Albertha	71.6	23.2	4.2	87.3	5.6	4	0.7	<p>Pedestrian pathways are an excellent planning feature within urban communities. As Beaver County is predominately rural, a pedestrian pathway plan is not feasible.</p> <p>The urbans located within Beaver County have separate policy documents (as they are separate municipalities) where something like a master transportation plan may be beneficial.</p>
	Commute within community	Commute within the County	Commute outside of the County	Car, truck or van	Public transit	Walked	Bicycled																																																		
Beaver County	16.1	36.6	46.3	94.9	0.5	1.5	0																																																		
Tofield	0	62.1	37.1	90.9	0	7.9	0																																																		
Viking	77.4	6.5	14.5	84.1	0	13.4	0																																																		
Ryley	58.6	27.6	10.3	81.6	0	15.8	0																																																		
Holden	27.3	45.5	18.2	78.6	0	0	0																																																		
Albertha	71.6	23.2	4.2	87.3	5.6	4	0.7																																																		



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p><b>Neighbourhood Design:</b> Neighbourhoods where people can easily connect with each other and with a variety of day-to-day services.</p> <p>Section 9.1 and 8.2 of the LUB stipulate the requirements of site plans of development and subdivision applications. Section 17 of the MDP mentions that ASPs will be required for developments with 4 or more lots. Section 17.10 provides a list of the types of supporting assessments that may be required at the discretion of the county.</p> <p>AHS-SHE supports the requirement for ASPs on multi-lot developments. AHS-SHE requests opportunity to review and provide comment on the technical reports, assessments and plans mentioned in these sections such as EIAs, TIAs, and hydrogeological assessment.</p>	<p>As part of any ASP or other statutory planning documents they are circulated to respective government agencies such as AHS-SHE and foresee this continuing with future applications.</p>
<p><b>General Land Use considerations:</b></p> <p><u>Confined Feeding Operations:</u> Specific restrictions for confined feeding operations are made under section 3.9, AHS-SHE supports restricting the development of such operations, including manure storage facilities, in proximity of residential and environmentally sensitive areas. Under Section 6.2 of the LUB considerations are made for the potential impact of existing CFOs within 1km of proposed non-agricultural developments. Under Section 3.2.i of the LUB, a development permit will not be required for CFOs that fall under the requirements of Part 2 of the AOPA.</p> <p>Please be advised that AHS no longer receives referrals from NRCB to provide comment on CFO applications, new or expanding. As such with the exemption of CFOs from requiring a development permit from Beaver County, there will be no input from a health perspective for these files.</p>	<p>Thank you for your comments.</p>
<p><u>Daycares:</u> Under the LUB, in Rural commercial districts, in addition to daycare facilities, the following services are listed as “permitted uses”: personal services (including drycleaners),</p>	



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p>cannabis retail and funeral homes (including crematoriums). AHS-SHE does not recommend allowing for these types of facilities adjacent to a daycare, additional context and recommendations are provided below.</p>	<p>The LUB has been amended in the district you are referring to as a specific regulation regarding setbacks from the respective uses.</p>
<p><u>Drycleaners</u>: There exists an incompatibility of uses between a daycare and businesses such as drycleaners which are known to use chemicals such as PERC (perchloroethylene), also known as tetrachloroethene. International Agency for Research on Cancer, IARC, classifies PERC as a Group 2A or “probable carcinogen”, routes of exposure include dermal and respiratory where it acts as a central nervous system depressant. The children in the care facility could be at risk of exposure to PERC and other potentially harmful chemicals should developments of the areas zoned as RC that include dry cleaner operations as would be permitted under the current draft of the LUB.</p>	
<p>It is the recommendation of this office that should a development of a proposed daycare and playground be approved, mitigation strategies to prevent potentially harmful fume/vapour releases or restrictions on future uses be put in place against uses that are known to generate them, such as dry cleaners, that would affect the high risk or sensitive populations, like children, on the adjacent lands.</p>	
<p>Land use restrictions have been recommended in other jurisdictions regarding this matter. For example, The California Air Resource Board and Environmental Protection Agency published the Air Quality and Land use Handbook- A community health perspective in April 2005, in which they discuss the risk of cancer to sensitive populations as well as the general public in relation to the location of dry cleaners. In this document a setback distance (for small drycleaner operations with only 1 machine) of 300 feet (approx. 100m) is recommended as it reduces the risk of cancer from chemical exposures by 75% to an average of 10 cases per 1 million exposed.</p>	
<p>A second example is the Guidance for the Assessment of Environmental Factors –</p>	



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p>Separation distances between industrial and sensitive land uses, published by the Australian Environmental Protection Authority in June 2005. This document recommends a 100m set back distance between sensitive land uses, which include childcare facilities and playgrounds, from dry-cleaner businesses. AHS-SHE supports the recommendation of a 100m setback distance from any drycleaner operation to a playground or childcare facility.</p>	
<p><u>Cannabis Retail:</u> Evidence shows commercialization of alcohol and tobacco has resulted in substantial population level morbidity and mortality as well as community level harms. This is of particular importance because adding cannabis use to a community adds multifactorial relationships to already existing social issues, as we know co-use or simultaneous use of cannabis, alcohol and/or tobacco, in some kind of combination is common.</p> <p>Locating cannabis stores away from schools, daycares and community centers is essential to protecting children from the normalization of Cannabis use. Cannabis stores should not be permitted within a buffer zone of any type of childcare facility or school. AHS also suggests that municipalities include other places that children and youth frequent as part of minimum distance bylaws such as parks, churches, and recreation facilities. AHS-SHE recommends a minimum 300m separation distance between cannabis stores and schools, daycares, and community centres.</p>	<p>It is provincially legislated that Cannabis Retail must be located at least 100 metres away from health care facilities and schools. Upholding provincial legislation, the LUB reflected this provision in the Specific Use Regulations for Cannabis Retail (Section 7.4).</p>
<p><u>Cannabis Production:</u> Section 7.4 of the LUB does stipulate a setback of 500m from sensitive uses such as schools, health care facilities and residential dwellings. Section 7.4.11 requires the inclusion of various plans including fire safety, waste management, water, stormwater and wastewater management and ventilation plans. AHS-SHE requests opportunity to review such plans in the future at the development stage.</p>	
<p><u>Crematoriums:</u> Alberta Funeral Services Regulatory Board (AFSRB) licenses crematoriums under the Cemeteries Act, however they do not have setback distance</p>	<p>Thank you for your comments and the LUB has been updated to reflect for crematoriums that</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p>requirements, nor do they monitor air quality. Alberta Environment and Protected Areas does not monitor emissions from crematoriums, as they are exempt from the Code of Practice for Small Incinerators (2005). The National Collaborating Centre for Environmental Health (NCCEH) has identified some crematory pollutants of concern including dioxins, furans, mercury, and fine particulate matter.</p> <p>To enhance public health and address the absence of legislated setback distances in Alberta between crematoriums and sensitive land uses, it is recommended that planning authorities establish specific setback requirements. The NCCEH (O'Keeffe, 2020) underlined the diversity in setback recommendations internationally, ranging from 150m to 500m. Planning authorities are encouraged to utilize setback requirements, implement equipment controls, and consider factors like the number of proposed cremations, local climate conditions, and proximity to sensitive receptors when evaluating the appropriateness of crematory sites.</p> <p>AHS SHE recommends that crematoriums be treated as a discretionary use, providing an additional layer of consideration in the planning and decision-making process.</p>	<p>carry out cremation on-site have site specific regulations to reflect the standards.</p>
<p><u>Campgrounds:</u></p> <p>Section 7.3 of the LUB requires campground applications with more than 40 sites, cabins, or structures to have a master or conceptual plan. AHS request the opportunity to review these, as well as the associated reports stipulated under Section 7.3.2 of the LUB.</p>	<p>As part of a typical application of this nature the County refers applications of this nature to government agencies including the Department of Health.</p>
<p><u>Resource Extraction:</u> Section 5 of the MDP outlines the objectives and policies regarding resource extraction, AHS-SHE supports the use of set-back distances, the remediation of abandoned wells, requirement for remediation plans, and special consideration for residential developments within 1.5 km of a sour gas facility.</p>	<p>Thank you for your comments and please note that subdivision applications are typically supported by these studies when identified as required on a site-specific basis.</p>





EMAILED COMMENTS																	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required																
<p>Section 7.11 of the LUB restricts sand/gravel developments within multi-lot subdivisions or within 300m of a multi-lot or hamlet residential subdivision. AHS-SHE recommends the requirement for an Environmental Impact Assessment, hydrogeological and biophysical assessments for these types of developments, some of the considerations of such assessments are included under Sections 7.11.5 and 7.11.14.</p>																	
<p><u>Drinking Water and Wastewater Servicing:</u></p> <p>The LUB allows for a variety of servicing options including un-serviced to both municipal water and sewer serviced, water only and sewer only, each with corresponding minimum lot sizes. Section 5 of the LUB states a minimum lot size of 20,000 ft<sup>2</sup> (or 0.46 acres) for UG and RC districts. For un-serviced lots, where onsite sewage systems are required, lot sizes smaller than 4.0 acres may not be sufficient to allow for a water well, primary onsite system and suitable back up location for an onsite system. Planning for the future of the development is important, as onsite systems may only function for 25 years.</p> <table border="1"> <thead> <tr> <th><i>District</i></th> <th><i>Minimum Lot Size</i></th> </tr> </thead> <tbody> <tr> <td><i>Low Impact-Eco Friendly Industrial (IE), Business/light Industrial (IL), Medium Industrial (IM),</i></td> <td>0.12 acre</td> </tr> <tr> <td><i>Urban General (UG) and Rural Commercial (RC)</i></td> <td>0.46 acres</td> </tr> <tr> <td><i>Rural Industrial (RI)</i></td> <td>1.0 acre</td> </tr> <tr> <td><i>Country Residential (CR)</i></td> <td>3.0 acres</td> </tr> <tr> <td><i>Tourism District</i></td> <td>4.9 acres</td> </tr> <tr> <td><i>Ministik Buffer Area</i></td> <td>40 acres</td> </tr> <tr> <td><i>Landfill and composting (LC)</i></td> <td>Not specified</td> </tr> </tbody> </table>	<i>District</i>	<i>Minimum Lot Size</i>	<i>Low Impact-Eco Friendly Industrial (IE), Business/light Industrial (IL), Medium Industrial (IM),</i>	0.12 acre	<i>Urban General (UG) and Rural Commercial (RC)</i>	0.46 acres	<i>Rural Industrial (RI)</i>	1.0 acre	<i>Country Residential (CR)</i>	3.0 acres	<i>Tourism District</i>	4.9 acres	<i>Ministik Buffer Area</i>	40 acres	<i>Landfill and composting (LC)</i>	Not specified	<p>There are various methods to address drinking water and wastewater servicing on-site. A number of factors go into the ability to accommodate onsite services and also require the approval of provincial agencies. These options range from wells to water tank storage or onsite septic systems to storage tanks. The nature of the use will also guide the type of systems installed. Finally, the County has used these lots sizes and they are not being changed as part of this review and no issues have been raised by the community through the process.</p>
<i>District</i>	<i>Minimum Lot Size</i>																
<i>Low Impact-Eco Friendly Industrial (IE), Business/light Industrial (IL), Medium Industrial (IM),</i>	0.12 acre																
<i>Urban General (UG) and Rural Commercial (RC)</i>	0.46 acres																
<i>Rural Industrial (RI)</i>	1.0 acre																
<i>Country Residential (CR)</i>	3.0 acres																
<i>Tourism District</i>	4.9 acres																
<i>Ministik Buffer Area</i>	40 acres																
<i>Landfill and composting (LC)</i>	Not specified																
<p>Section 5.6.6 of the LUB requires that multi-lot subdivisions adjacent to municipal water and or sewer services connect to the municipal utility system. AHS-SHE supports connection to, or deferred services agreements for future connection to, Alberta Environment &amp; Protected Areas (AEPA) licensed drinking water and</p>	<p>The County at subdivision or development permit stage takes into account the setbacks to water and sewer systems utilising GIS data.</p>																



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p>wastewater systems and discourages unlicensed communal systems or long-term reliance on pump and haul holding tanks. Consideration for meeting the setback distances under Section 15 of the <i>Nuisance and General Sanitation Regulation, NGSR (AR 243/2003)</i> between sewage systems and drinking water wells should be made at the subdivision and development stages. Mapping of the location of the drinking water wells and existing sewage systems within and adjacent to the plan areas are recommended to protect drinking water sources and prevent negative health impacts on residents.</p>	
<p>Section 5.6.9 of the LUB mentions support for options to increase water efficiency and innovative technologies. AHS-SHE supports such climate resilience and innovations and recommends compliance with the Alberta <a href="#">Public Health Guidelines for Water Reuse and Stormwater Use</a> where applicable.</p>	<p>Thank you for your information.</p>
Response 5	
<p>Within the MDP sections listed below the following sample policies and objectives are provided and encouraged to be included in the MDP and LUB.</p> <p><b>Municipal Development Plan</b></p> <p><u>Section 3</u></p> <ul style="list-style-type: none"> <li>The County <i>will</i> encourage and promote programs and initiatives that support conservation practices and agricultural stewardship.</li> </ul>	<p>The existing MDP policy seeks to manage agricultural land within the jurisdiction governed under the Municipal Government Act vs regulations governed by the province under the Agricultural Practices Act and Section 11.0 covers matters relating to conservation.</p>
<p><u>Sections 4 – 7</u></p> <ul style="list-style-type: none"> <li>The County <i>will</i> encourage both urban developers and municipal planners to incorporate beneficial management practices in the development design, planning review, and construction stages such as:                             <ul style="list-style-type: none"> <li>Design plans and projects from the start such that they minimize overall</li> </ul> </li> </ul>	<p>County policy seeks to minimize disturbance of wetlands through retaining where possible and placing buffers around waterbodies in alignment with provincial policies.</p>



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<p>footprint and wetland disturbance and maximize buffers around all waterbodies.</p>	
<ul style="list-style-type: none"> <li>○ When reviewing plans and project proposals ensure full Municipal and Environmental Reserve is utilized to protect buffers, flood zones and riparian edges around wetlands and other waterbodies. Look for low-impact surface run-off systems.</li> </ul>	<p>A key purpose of Environmental Reserve is to create the required buffers around riparian edges. In a rural community stormwater runoff needs to comply with the County's bylaw relating to stormwater management.</p>
<ul style="list-style-type: none"> <li>○ During construction, enforce regulations for erosion and sediment control, as well as noxious and invasive species control around wetlands and other waterbodies.</li> </ul>	<p>Sediment and erosion control measures are generally a condition of a development permit where construction is involved.</p>
<p><u>Section 8</u></p> <ul style="list-style-type: none"> <li>• Encourage broadening the focus beyond specific areas as connectivity of wild spaces is important. In addition, Beaver County is located within the Prairie Pothole Region which is internationally recognized for its waterfowl habitat. Given the proportion of wetlands already lost any further impact to wetlands and associated uplands have a disproportional further deteriorating effect.</li> </ul>	<p>The management of wetlands is through the province and the County's approach aligns with provincial regulations.</p>
<ul style="list-style-type: none"> <li>• Recommended corresponding policies: The County <i>will</i> explore opportunities to:                             <ul style="list-style-type: none"> <li>○ Further inventory natural assets in their relation to wildlife habitat but also the value of these assets to municipal service delivery.</li> </ul> </li> </ul>	<p>The provincial habitat wildlife map is used as a guide when reviewing a development application. Any large-scale development that involves an Area Structure Plan, Conceptual Scheme or subdivision may be required to complete a biophysical assessment to formally delineate any identified wetlands and significant ecological features.</p>
<ul style="list-style-type: none"> <li>○ Further increase protections in bylaws, policies and procedures to protect wetlands above and beyond the Alberta Wetland Policy.</li> </ul>	<p>Carrying out this step would be redundant as the municipality does not have jurisdiction on water bodies.</p>
<ul style="list-style-type: none"> <li>○ Increase wetland area and numbers.</li> </ul>	



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<ul style="list-style-type: none"> <li>○ Increase associated upland habitat area (including grasslands).</li> </ul>	While the County supports this approach, they do not have the resources to carry out these initiatives.
<ul style="list-style-type: none"> <li>● The County <i>will</i> incorporate wetland retention and restoration into flood and drought adaptation and management plans, source water protection, stormwater management, and water quality maintenance.</li> </ul>	The County recognizes the value of wetlands and the impacts of flooding/droughts and works in collaboration with other government agencies relating to improving our ecosystem.
<p><u>Section 9</u></p> <ul style="list-style-type: none"> <li>● The County <i>shall</i> where possible, integrate existing wetlands into programmed open space design, green belt planning, environmentally significant areas, etc.</li> </ul>	The County encourages the protection of wetlands but is not responsible for the regulation of waterbodies related to development.
<p><u>Section 11</u></p> <p>The most important objective and policy relate to implementing a goal to manage the County in a way that results in a no net loss of wetlands and grasslands. The following objective and policies are drafted to assist with this:</p> <ul style="list-style-type: none"> <li>● <u>The County <i>should</i> be managed in a way that achieves no net loss of wetland area and functions.</u></li> </ul>	Refer to above comment.
<ul style="list-style-type: none"> <li>● The County <i>should</i> restore or collaborate with organizations to restore lost or degraded wetlands where feasible and beneficial to benefit municipal service delivery and nature conservation.</li> </ul>	The County supports such initiatives but is not resourced to carry out such initiatives.
<ul style="list-style-type: none"> <li>● The County <i>should</i> be managed in a way so that it:                             <ul style="list-style-type: none"> <li>○ Will maintain or restore associated upland areas to retain or enhance landscape connectivity where ecologically significant wetland complexes exist.</li> </ul> </li> </ul>	
<ul style="list-style-type: none"> <li>○ Maintains core ecological functions and services of wetlands (e.g., water</li> </ul>	



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
storage, flood control, biodiversity support, climate regulation, etc.) through planning of compatible adjacent land uses.	
<ul style="list-style-type: none"> <li>The County <i>should</i> Work with the province to ensure approvals given under the Water Act, Public Lands Act or the Environmental Protection and Enhancement Act are consistent with municipal wetland goals and objectives.</li> </ul>	The County works with the province on a range of items, ultimately the province is the regulatory body responsible for wetlands.
<ul style="list-style-type: none"> <li>The County <i>should</i> explore adoption of additional policies such as a wetland policy to further establish control over wetlands management and associated outcomes such as flood risk reduction.</li> </ul>	Refer to comments above.
<ul style="list-style-type: none"> <li>The County will conduct further public education about the importance of all types wetlands to increase awareness, protection and restoration of these ecosystems.</li> </ul>	The County has limited resources and uses provincial information regarding the importance of wetlands.
<p><b>Land Use Bylaw</b></p> <p>Review the North Saskatchewan Watershed Alliance – Riparian Discussion Guide (a copy is attached) in relation to recommendations for including provisions to protect riparian areas. Consider wetlands as requiring similar further integration into the LUB. For example, the guide outlines requirements such as:</p> <ul style="list-style-type: none"> <li>Include wetlands in new definitions for water features;</li> </ul>	Riparian margins and its definition are guided by the Province.
<ul style="list-style-type: none"> <li>Require specific information relating to wetlands in subdivision applications;</li> </ul>	If the property is identified as containing wetlands the applicant is required to support with application with a study delineating the wetland boundaries.
<ul style="list-style-type: none"> <li>Require delineation of wetlands during the subdivision process;</li> </ul>	Refer to above.



EMAILED COMMENTS	
Verbatim Comments	How were the comments addressed? If they weren't, why not? *if deemed required
<ul style="list-style-type: none"> <li>Develop setback requirements for development from wetlands; and</li> </ul>	Setbacks are guided by the Department of Environment.
<ul style="list-style-type: none"> <li>Prohibit disturbance of wetlands during development.</li> </ul>	Silt and sediment controls are required as part of a development permit to avoid impacts on wetlands.



*This page is left intentionally blank.*







Beaver County