



February 20, 2012

Parkland County
Planning and Development Services
53109A SH 779
Parkland County, Alberta
T7Z 1R1

Dear Ms. Kormos, Senior Development Planner;

RE: Submission of Comments and Opposition to Proposed Bylaw 01-12

The Alberta Sand and Gravel Association ("ASGA") wishes to submit our organization's comments on the proposed changes to Land Use Bylaw 20-2009 and specifically, Bylaw No. 01-2012 which removes Section 12.12 (1)(a) to no longer allow natural resource extraction within 304.8m (1000') of the boundary of a multi-parcel residential subdivision as a Discretionary Use.

The ASGA advocates the orderly and responsible development of Alberta's aggregate resources, promoting high standards of workmanship and accountability related to the environment. The ASGA believes that Parkland County should not amend Land Use Bylaw 20-2009, with Bylaw No 01-12 and continue to allow extraction only operations within the buffer adjacent to multi-lot residential subdivisions for the following rationale:

Resource Sterilization

Sand and gravel is a non-renewable resource found in diminishing quantities in the Greater Edmonton area. Sterilization of these sand and gravel reserves could result in increased aggregate costs to users and consumers of our products and decreased overall revenue to Parkland County.

The ASGA believes that responsible development of sand and gravel reserves is essential and is most effective when there is collaboration among operators, regulators and residents.

Promotion of Close to Market Aggregate Resources

The development of close to market aggregate resources benefits the economy and the environment. Parkland County should continue to promote sand and gravel development, including extraction only operations within the 304.8m (1000') boundary of multi-lot residential subdivisions since longer truck hauling times and distances equates to:

- greater air pollution and carbon loading
- higher overall costs for construction and infrastructure projects
- greater impact on local roads and highways

Property Rights

Parkland County landowners should have the right and opportunity to develop their agricultural, commercial or industrial properties in a legislatively approved manner. Landowners with aggregate resources should have an opportunity to develop them responsibly and not be restricted by the

development or presence of multi-lot residential subdivisions. The ASGA believes that responsible aggregate development can occur within close proximity to multi-lot residential subdivision through proper planning, effective mitigation strategies, incorporation of best aggregate management practices and structured, regular communication consultations. When these measures are combined with strict enforcement of your regulations, all stakeholders will benefit.

Temporary Land Use

Natural resource extraction is an interim land use. Ultimately the lands will be returned to equivalent land capability. In terms of operating within 304.8 metres (1000') of a multi-lot residential subdivision, sand and gravel operators should be allowed to permit "Extraction Only" operations as a Discretionary Use.

The ASGA proposes that long-term residential land uses should not be provided higher priority and status than short-term aggregate extraction land uses.

Community Improvement or Enhancement

The sand and gravel industry provides numerous economic and employment benefits to the local community.

- operators employ local people and contractors
- operators contribute Community Aggregate Payment (CAP) money to Parkland County for every tonne of sand and gravel that goes to market. The intent of these funds is to assist with County projects and initiatives and can lessen the overall tax burden
- the return of a pit area to equivalent land capability can provide added benefit to the local community
- development of local aggregate deposits equates to lower emission per tonne of gravel delivered to market, lower density of trucks on road systems and less road deterioration

Please consider this letter a request for the ASGA to make a presentation to council on this proposed bylaw. Thank you for the opportunity to provide our organization's input on the proposed Bylaw change. I can be reached for any questions or concerns regarding our comments at (780) 986-6721.

Sincerely,
The Alberta Sand and Gravel Association



Brock Helm
President, ASGA Board of Directors

cc: Board of Directors, ASGA
Teri Muhlbeier, Executive Director, ASGA