

Karen Kormos

From: bernie & maryann kolkman [mailto:bernie@berko.com]
Sent: Wednesday, February 22, 2012 7:32 AM
To: Karen Kormos
Subject: Proposed Bylaw No. 01-2012

February 22, 2012

Acting Senior Development Officer
Planning & Development
Parkland County
Stoney Plain Alberta

Attn: Karen Kormos

Please accept our formal response to the noted bylaw. BERKO Services Ltd. provides technical, permitting, development and reclamation services to the sand and gravel industry in Alberta and Saskatchewan. With over 35 years experience we have seen numerous deposits depleted, resulting in the continued need for new sources to be found; all the while with development(s) facing increasing challenges and operating costs to insure sand and gravel deposits are optimized and the lands eventually returned to their previous best use.

During this time much progress has been made in the quality of operating practices e.g. dust and noise controls, implementation of set backs and buffers, industry specific speed limits and the ASGA truck registry specifically to mitigate concerns over gravel hauling. These efforts have improved the relationship between operators, rural residents and the public, and are a credit to the collaborative efforts between industry, government and various enforcement agencies.

Parkland County's existing "discretionary use" for mining and hauling within 304m (1000') of a residential subdivision is a solid compromise between the needs of gravel pit developers, operators and haulers; and the public. The removal of this discretionary use will adversely effect the overall viability of sand and gravel reserves in Parkland County and the Greater Edmonton Area. Passage of this by-law will result in:

- large amounts of proven deposits becoming sterilized
- the reduction of life cycles on existing, permitted pits
- acceleration of yet to be developed sources being brought on line
- an inevitable increase in development permit applications for sand and gravel
- an increase in the overall numbers of land disturbances
- increase distances over which sand & gravel is carried to market
- increases in fuel consumption, wear and tear, carbon footprint etc.
- increases in retail pricing for sand and gravel products to recover these additional costs

The encroachment of rural residential development continues to sterilize medium and long term gravel reserves all around the province. We urge Parkland County to delay passage of this bylaw and allow for optimal extraction of materials from pits already approved; or consider a compromise by approving a sunset clause for the permitting of known reserves to facilitate continued "discretionary use" within the 304m (1000') set back distances.

Thank you for your consideration of this matter.

Regards:

Bernie Kolkman
BERKO Services Ltd
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