

February 21, 2012

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

Attention: Karen Kormos

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

Mixcor Aggregates Inc. ("Mixcor") submits our organization's comments regarding 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 304.8 (1000') from the boundary of a multi-parcel residential subdivision as a Discretionary Use. In addition, Mixcor would also like to request a ten minute presentation block for the opportunity to address council on this proposed bylaw.

Mixcor believes that Parkland County should not pass Bylaw No 01-12 and continue to allow for extraction only operations within the buffer of multi-lot residential subdivisions and offers the following rationale

Natural Resource Sterilization

Sand and gravel is a non-renewable resource which is found in increasingly lesser quantities around the Greater Edmonton area. Sterilization of these sand and gravel reserves could result in:

- increased aggregate costs to users and consumers of our products
- decreases overall revenue to Parkland County
- larger volume of trucks on regional road networks as sand and gravel operators are required to haul aggregates from farther sources, which concurrently increases each operators' overall carbon footprint
- Camrose County, for instance, has a limited quantities of aggregate resource remaining within the county boundaries. Section 13 (Mineral Resources) of the Camrose County Land Use Bylaw #1052 states that "Extracting Resource Minerals in a careful, planned manner will generate jobs for residents and taxes for the county. Council has a responsibility to see that the resources are not sterilized by incompatible surface development." Camrose County places the onus squarely upon the sand and gravel operators to work with residents in removing these reserves as expeditious as possible and mitigate any concerns addressed by local residents. The link to the MDP is enclosed --> [www.county.camrose.ab.ca/bylaws/administration bylaws/bylaw 1052](http://www.county.camrose.ab.ca/bylaws/administration%20bylaws/bylaw%201052) Municipal Development Plan

Parkland County should advocate for the responsible and expeditious development of these sand and gravel reserves, especially those deposits close to markets and within proximity of multi-lot residential subdivisions, and work in collaboration with operators, regulators and concerns residents and landowner associations to ensure that sterilization of these resources can be minimized.

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Landowner Property Rights

Parkland County landowners should have the right and opportunity to develop their properties in an approved and legislated manner, which can translate into an agricultural, commercial or industrial intended use. Landowners who own lands containing aggregate resources should have an opportunity to develop them responsibly and not be inhibited or heavily restricted due to the presence of multi-lot residential subdivisions.

- Are long-term rural residential land uses, whether multi-lot subdivisions or singular residential lots, provided higher priority status than short-term, interim land uses like aggregate extraction. Aggregate extraction is a short term venture where reclamation will be returned to equivalent land capability
- How is extraction only operations within the 304.8m (1000') buffer of a multi-lot residential subdivision different than the structured development of a multi-lot residential subdivision?
 1. Both ventures involve soil relocation with heavy equipment and will generate comparable amounts of dust, noise and disruption during daytime hours.
 2. Primary difference is that Extraction Only operations will have significant restrictions to minimize impacts and contain a hard timeline for completion whereas a multi-lot residential subdivision is permanent, become more intensive with development and final completion could exceed that of an Extraction Only Aggregate Operation.
- Do residents and landowner associations within existing multi-lot subdivisions oppose other land use developments, in terms of new adjacent multi-lot residential subdivisions, campgrounds, recreation facilities, oil and gas operations, that could impact their qualities of life? Some of these scenarios have similar development phasing as aggregate operations.

In summary, long-term residential land uses should not be provided higher priority and status than short-term aggregate extraction land uses.

Promotion of Close to Market Aggregate Resources

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

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

Community Improvement or Enhancement

The sand and gravel industry provides numerous benefits to the local community, whether economic, employment or environmental.

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

Continuance of Section 12.12 (1)(a) of Land Use Bylaw 20-2009

Mixcor feels that "Extraction Only" operations can co-exist with local residents under related conditions and offers the following suggestions, solutions and mitigative measures for Parkland County to allow aggregate producers the opportunity to continue Extraction Only operations within the 304.8m (1000') buffer of a multi-lot residential subdivision:

- sand and gravel operator provide a business plan determining the amount of time required to finish all operations within the buffer offset
- reduced extraction hours, which could translate into only daytime hours and no weekends.
- develop site specific operational controls that will satisfy local concerned residents and advocate sand and gravel operators to expeditiously and responsibly extract the aggregate resources
- regular community engagements, in the form of meetings with landowner associations, local residents and open houses
- consultant reports to address residential concerns on noise and water, if deemed applicable by Alberta Environment and Water, Parkland County and local residents

In keeping this Discretionary Use in place, Parkland County Planning and Development and Council can make the appropriate land use decision based upon the information compiled within the Development Permit application, total quantity of sand and gravel reserves situated within the buffer and effectiveness of operational mitigation plans and strategies instead of a perceived lack of compatibility with the surrounding area.

Any questions or concerns regarding the comments and rationale for Parkland County not approving Bylaw No 01-2012 can be directed to (780) 986-6721.

Sincerely,
Mixcor Aggregates

Brock Helm
Aggregate Resource Manager

cc: Gary Zeitner, GM, Mixcor Aggregates
Terry Mix, Owner, Mixcor Aggregates