Box 242,
Crowsnest Pass, AB T0K 0E0
September 27, 2025

Mayor and Councillors,
Box 600,
Crowsnest Pass, AB T0K 0E0

Dear Mayor Painter and Councillors,

Re: Proposed Bylaws No. 1240, 2025 and No. 1241, 2025: Land Use Bylaw Amendments

The Crowsnest Conservation Society (CCS) is "a diverse group of individuals with a passion for nature and the beautiful landscapes in the Crowsnest Pass and surrounding area. We share a strong conservation ethic." Our vision states "we work together with community partners" to ensure "private and public decisions about land development are made with the long-term needs of wildlife and sustainable community as key factors." (https://www.crowsnestconservation.ca)

We have several concerns about Proposed Bylaws 1240, 2025 and 1241, 2025. They include:

- Proposed Zoning and Housing Type not needed or desirable
- Reduction of Wildlife Corridors
- Limited Access and Egress
- Access to Potable Water
- Septic Fields and Stormwater drainage in the area

1. **Proposed Zoning and Housing Type not needed or desirable**

a. The creation of an additional Grouped Country Residential (GCR) Subdivision within our municipality is not needed or desired.

"The MCNP is also dealing with a legacy of large lot, low density housing, typically called "country residential development. P.25 MDP

We have too many GCR subdivisions which have never been completed by developers, to the detriment of current residents who have no access to water for fire prevention or no egress if the single access road were to be closed. Most of these existing subdivisions have not yet sold or had residences built on each lot. It makes no sense to start another subdivision.

b. The proposal for a Grouped Country Residential Subdivision is in contravention of Council's own Municipal Development Plan that emphasizes the need for increased densification of the Municipality (2000).

2. **Reduction of Wildlife Corridors**

The CCS supports all the work done recently by environmental groups to support wildlife connectivity in our area, such as Road Watch, Miistakis Institute, and the Nature Conservancy of Canada (NCC). This research and planning should be respected rather than allowing a residential development that will jeopardize wildlife movement.

a. A survey quoted in the *Crowsnest Pass Municipal Development Plan* stated that 93% of people identify the natural environment as the most defining characteristic of the Crowsnest Pass. (P.101 MDP). That priority held by local residents would be ignored if Council approved this Area Structure Plan and rezoning.

b. This proposed development is near the municipally-defined East Linkage Zone wildlife linkage corridor (MDP, P.15). Evidence collected by the above organizations confirm that the East Wildlife Linkage Zone is important for the movement of large wildlife. Privately owned land nearby has recently had extensive logging that will also affect movement of wildlife.

c. The designation of these Non-Urban lands for any type of development is in contravention of the current *Crowsnest Pass Municipal Development Plan* which emphasizes the importance of maintaining wildlife corridors.

> "Goal: Sustain a harmonious balance between natural and built environments by directing development to built-up areas – preventing the fragmentation of wild lands and preserving the unique biodiversity of the MCNP. P. 74 MDP

d. The preference of the Municipality to accept funds in lieu of 10% Municipal Reserve land is short-sighted.

The Crowsnest Conservation Society believes that money collected will just be spent. Lands that are set aside in the planning stage of a development have a much higher chance of never being developed, which is the best option for wildlife. The proponents have indicated in conversations with us that they are willing to create a strip of Municipal Reserve that could extend across the two quarter sections that Sentry Six owns, creating a larger and much more viable wildlife corridor through the developed area.

3. **Limited Access and Egress**

The proposed Area Structure Plan shows Adanac Rise as the single access and egress road to the area, to include between 40 and 49 different lots after subdivision.

We are very concerned about future risk to these residents. If there were to be a need for evacuation of the area at the same time as fire trucks require access to fight a wildfire, both residents and workers would be at risk.

4. **Access to Potable Water**

The *Crowsnest Pass Land Use Bylaw* for Grouped Country Residential subdivision requires access to potable water for each lot (Schedule 2-GCR-1). Also, under the *Alberta Municipal Development Act*, the *Subdivision and Development Regulations* require the availability and adequacy of a water supply.

> 7. "In making a decision as to whether to approve an application for subdivision, the subdivision authority must consider, with respect to the land that is the subject of the application, …f) the availability and adequacy of a water supply…." *Subdivision & Development Regulations*, P.10 (emphasis added}

The CCS recognizes that the findings of the Phase 1 Groundwater Supply Assessment imply that each lot should have access to the expected amount of water needed annually for average households.
We are concerned, however, that even with a requirement for a Phase Two Groundwater Supply Assessment prior to Subdivision Approval, there is no mention of what will happen if the Phase Two Assessment shows that there is less water access than expected.

5. **Septic Fields and Stormwater Drainage in the area**

The Area Structure Plan expects that each lot owner will be responsible for establishing a method for handling sewage from the dwelling, meeting provincial expectations. It is also stated that septic fields must stay within lot boundaries, that also contain the well for that property.

We are concerned that the addition of more septic fields to the existing ones in the area have an increased risk of contaminating wells, aquafirs, and natural water courses near the headwaters of the South Saskatchewan River. Because the whole property has significant elevation differences, we are also concerned that consideration be given to the impact of heavy rainfall events.

Conclusion:

The Crowsnest Conservation Society appreciates the opportunity to participate in this public Hearing process. If Council decides to approve this application in spite of the issues raised above, we urge you to accept a 10% Municipal Reserve allocation in land set aside rather than a cash payment from the developer to encourage the movement of wildlife through the area.

Sincerely,

Brenda Davison, President, on behalf of the
Board of Directors

References

Miistakis Institute and Nature Conservancy of Canada (2022), *Linking Landscapes: Helping Wildlife Move around the Crowsnest Pass.* https://www.rockies.ca/files/reports/MIR_NCC_LinkingLandscapes_ParticipantUpdate_OCT2022_Final.pdf

Municipal Government Act, Revised Statutes of Alberta 2000, Chapter M-26 (MGA). *Current in 2016.*

Municipality of Crowsnest Pass Development Plan (MCDP), Bylaw No. 1059, 2020.

SentrySix Land Corporation (2025). *Bear Valley Area Structure Plan.*

Standards of Development, Municipality of Crowsnest Pass Land Use Bylaw No. 868-2013, consolidated to Bylaw No. 1157-2023.I (LUB).