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 Bylaw No. 1243, 2025: Land Use Bylaw Amendment

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 are strongly opposed to Proposed Bylaw 1243, 2025, for three reasons:

1. Land classified as Environmentally Significant Area
2. Isolated Non-Urban property
3. Proposed Zoning and Housing Type not needed or desirable

1. Land classified as Environmentally Significant Area

The CCS considers itself a guardian for the long-term needs of wildlife within the natural landscapes in our community. The identified land for this proposal is north of the Crowsnest River. It is south of the McGillvray Creek but within the same quarter.

The research and planning that Miistakis Institute and the Nature Conservancy of Canada (NCC) have done in our municipality should be respected rather than allowing a residential development that will jeopardize wildlife movement.

The Crowsnest Pass administrative summary of this proposal for changing the zoning of this portion of NE¼ 18-8-4-5 from Non-Urban to Grouped Country Residential states:

> "The subject property is outside but near the edge of the Miistakis Ecological Corridor and outside of the Forest Reserve…In the "Environmentally Significant Areas of Alberta 2014" report the quarter section has a summed score of 0.2227, which means it is an Environmentally Significant Area (ESA)…the ESA cut-off value is 0.189…The NW-18-8-4-5 has a summed ESA score of 0.1616, and the SW-18-8-4-5 has a summed ESA score of 0.2083." (Request for Decision, September 9, 2025)

The land within this proposed parcel is in the quarter that has the highest ESA value of three neighbouring quarters. These ratings reflect frequent wildlife use of these lands for movement between feeding grounds and breeding areas. Any residential development at all in these officially rated environmentally sensitive lands will have an immediate effect on the movement of large animals such as elk, grizzly bear, and cougars, in addition to other ungulates and smaller mammals.

2. Isolated Non-Urban property near north border of Municipality

The CCS is also concerned that this proposed development is surrounded by empty quarter sections, all but one zoned Non-Urban. This fact means that wildlife are accustomed to the undeveloped landscape. South of the empty quarter bordering the identified property is a 20-lot GCR subdivision and then urban development next to Highway #3. If this proposal is approved, there would be no connectivity between developed areas. Connectivity is a requirement for efficient delivery of municipal services such as garbage pick-up, road maintenance, and snow clearing. Developing this parcel of isolated land would cost the Municipality more in long-term maintenance than other Grouped Country Residential subdivisions. Long term cost benefits of this type of zoning have been a topic of discussion in the Municipality for years.

3. Proposed Zoning and Housing Type not needed or desirable

We believe that the creation of an additional Grouped Country Residential Subdivision within our municipality is not needed or desired. We have too many GCR subdivisions which have never been completed by developers, to the detriment of current residents who worry about fire prevention or 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. In addition, approving new Grouped Country Residential Subdivisions is in contravention of Council's own Municipal Development Plan (2000).

> "Densification is the basis of the MCNP growth strategy…Setting density targets for new development areas means that more people will live on a smaller footprint of land, which makes infrastructure delivery more affordable, supports businesses and protects important natural areas. This is particularly important in Crowsnest Pass because of the limited land base and environmental constraints. P.29 MDP

Conclusion:
The Crowsnest Conservation Society appreciates the opportunity to participate in this public Hearing process. We urge you to reject this application for rezoning of this isolated parcel of land to Grouped Country Residential due to the Environmental Significance of the land for large wildlife and the long-term additional costs to the Municipality.

Sincerely,

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