Brief Opposing
Proposed Bylaws No. 1233, 2025 and NO. 1234, 2025: Land Use Bylaw Amendments
By
Crowsnest Conservation Society
September 8, 2025

The Crowsnest Conservation Society 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)

The Crowsnest Conservation Society urges you to reject this Tecumseh Area Structure Plan and application by SentrySix for a rezoning of Non-Urban Area – NUA-1 land to Grouped Country Residential- GCR-1 and of Non-Urban-NUA-1 to Recreation and Open Space – RO-1. It will result in the subdivision of this property to create 23 Grouped Country Residential lots.

There are five important reasons for rejecting these applications;

- Proposed Zoning and Housing Type not needed or desirable
- Interference and Reduction of Wildlife Corridors
- Risk of Damage to Existing Wetlands on Property
- Lack of Access to Potable Water
- Impact of more Septic Fields in the area

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

    a. The creation of an additional Grouped Country Residential 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 (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

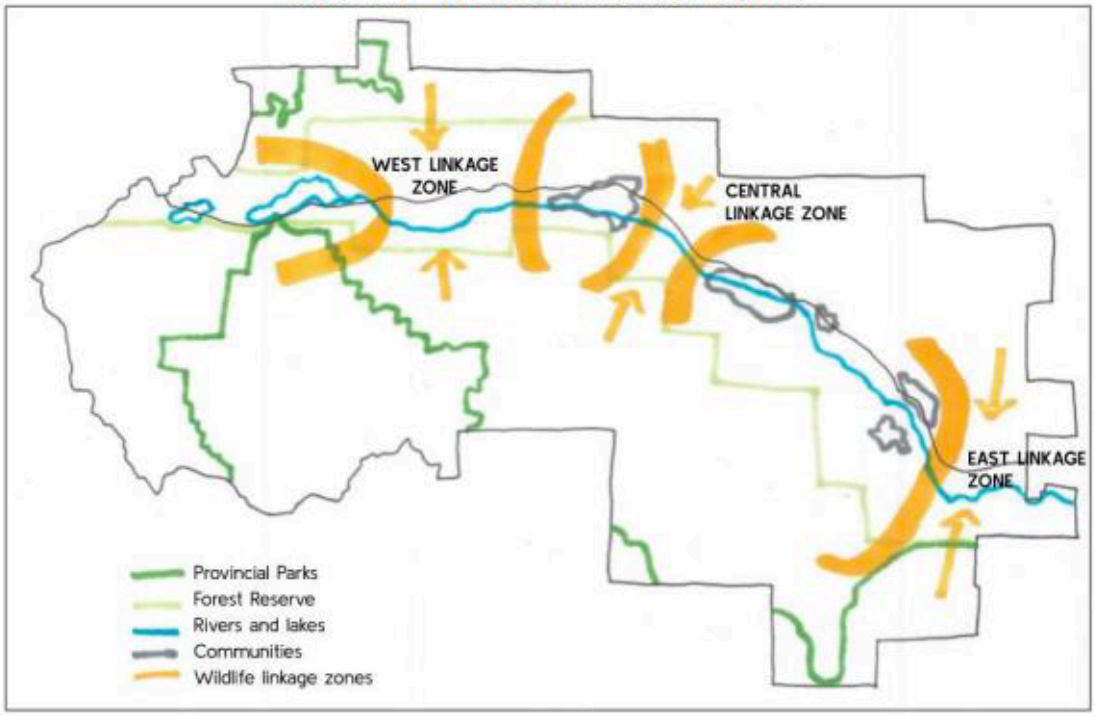
"GOAL: Direct new residential development to existing urban areas and establish a sustainable density target – supporting a wide range of housing option in size, style, and price for a diverse population. P.60 MDP

2. Interference and Reduction of Wildlife Corridors

The Crowsnest Conservation Society 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 in the middle of the municipally-defined West Zone wildlife linkage corridor (MDP, P.15).

FIGURE 9 - WILDLIFE LINKAGE ZONES



15

The NCC created the Jim Prentice Wildlife Corridor and has conducted a wildlife monitoring study with Miistakis Institute over the past three years. They have proven that the Crowsnest Pass "contains the highest number of medium and large animal species in North America" (Miistakis Institute and NCC, 2022). Road Watch and Miistakis had previously identified where wildlife collisions occurred and where a wildlife crossing structure would be valuable.

The evidence collected by these three organizations confirm that the West Wildlife Linkage Zone as described in the MDP is critical to the movement of large wildlife.

c. The designation of these particular 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.

> "The municipality's five urban communities are separated by areas that remain generally undeveloped. In effort to retain critical habitat areas and wildlife linkage zones, and to maintain distinct identities for each community within the municipality, these spaces should be left in an undeveloped state (not including linear uses like trails and utilities). P. 35 MDP
>
> "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. This proposal is also in contravention of the Alberta government requirement for the Municipality to abide by the South Saskatchewan Regional Plan, approved in 2014 and amended in 2018, under the *Alberta Land Use Act*, *Regulatory Details*, Part 1, Section 2,(1.c).

The South Saskatchewan Regional Plan states key outcomes as:

> "Biodiversity and ecosystem function are sustained through shared stewardship."
> "Watersheds are managed to support healthy ecosystems and human needs through shared stewardship."
> "Land is used efficiently to reduce the amount of are that is taken up by permanent or long-term developments associated with the built environment."
> "The quality of life of residents is enhanced through… the preservation and promotion of the region's unique…natural heritage." SSRP P.45, 46

and strategic directions as

> "Conserving and Maintaining the benefits of biodiversity."
> "Advancing watershed management."
> "Promoting efficient use of land."
> "…preserving and promoting the region's unique…natural heritage." SSRP P.45, 46

e. We recognize the attempts by the proponent to accommodate the existing wildlife patterns by excluding much of the Old Growth Forest area from the planned residential lots. It may help to mitigate the future situation but avoiding development altogether would be better for wildlife.

3. Risk of Damage to Existing Wetlands within the proposed development.

The Biophysical Assessment submitted by the developer identifies nine wetlands within the proposed area. It is admirable that each of those wetlands with a 30 m buffer will be part of the future Municipal Environmental Reserve. It is worth noting, however, that

> "McElhanney recommends conducting a Pathway 5 – Comprehensive Desktop Delineation with Field Verification. Furthermore, any proposed impacts to wetlands would require a Wetland Assessment Impact Report (WAIR) prepared by a QWSP, which would be the responsibility of the developer. To accurately determine the permanence of each wetland, a field assessment using the ABWRET-A protocol will be necessary as well as a review of aerial photographs dating back further than 1971 if available." *Biophysical Assessment Report: Sentry Ridge Development,* P.17

The Crowsnest Conservation Society believes that a detailed on-site examination of the wetlands and regionally sensitive areas must be required by Council to ensure that the proposed development adheres to the *Municipal Development Plan*, the *Standards of Development* in the municipal *Land Use Bylaw* and the expectations of provincial agencies regulating such areas.

We also urge Council to require actual land allocation rather than money in lieu of Environmental Reserve. Availability of land is finite. Money is just spent.

4. Lack of Access to Potable Water

a. The *South Saskatchewan River Basin Management Plan (2015)*, under the *Alberta Water Act*, has not allowed any new water licenses since 2006 except for conservation purposes.

This proposal is for a new Grouped Country Residential subdivision within the South Saskatchewan River Basin. It will have to be demonstrated that the new wells are not taking water from the aquafers in the closed river basin. We could not find any references to the South Saskatchewan River Basin in the groundwater report, although four different aquafir types at differing levels are identified.

b. 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 Crowsnest Conservation Society is concerned that the *Phase Three Groundwater Availability Assessment* report on Page 32 repeatedly uses words like "estimated annual recharge," "assumed yield," and "number of lots determined in consideration of estimated

groundflow" (McElhanney Ltd, *Phase Three Groundwater Availability Assessment).* None of these phrases give us confidence that there is sufficient water for a total of 30 subdivision lots in Sentry Six holdings in addition to the existing dwellings in the adjacent area.

We recognize that the groundwater report advises that six of the 23 new lots must use cisterns due to the likely low flow of shallower wells. We support that these cisterns should be a requirement prior to subdivision. We also appreciate the prohibition of additional wells on those properties.

5. **Impact of more Septic Fields 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. It is hoped that advice will be sought from knowledgeable professionals who will then install the best type of sewage system for that property, taking the total number of existing and new septic fields into consideration.

The Crowsnest Conservation Society is concerned that the additional of 23 more septic fields to the existing dozens in the area have an increased risk of contaminating wells, horizontal aquafirs, and natural water courses near the headwaters of the South Saskatchewan River. The recent example of the Beaver Mines community is an example of the risks and expenses incurred when groundwater cannot provide potable water anymore.

Conclusion

There are five important reasons the Crowsnest Conservation Society opposes Proposed Bylaws No. 1233, 2025 and No. 1234, 2025, that would allow SentrySix to create a new Grouped Country Residential Subdivision in the Tecumseh part of the Municipality of the Crowsnest Pass.

- Proposed Zoning and Housing Type not needed or desirable
- Interference and Reduction of Wildlife Corridors
- Risk of Damage to Existing Wetlands
- Lack of Access to Potable Water
- Impact of more Septic Fields in the area

The Crowsnest Conservation Society urges you to deny approval of Proposed Bylaws No. 1233, 2025 and No. 1234, 2025.

Council's refusal to approve this application will help to maintain existing wildlife corridors, water quantities and quality, the integrity of our own municipal goals, and provincial requirements that are committed to preserving healthy natural landscapes for future generations of Albertans.

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.

McElhanney Ltd, *Biophysical Assessment Report: Sentry Ridge Development,* 2025

McElhanney Ltd, *Phase Three Groundwater Availability Assessment*, 2025

SentrySix Land Corporation (2023). *Tecumseh Subdivision Development Proposal*. (Proposal).

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

South Saskatchewan Regional Plan (2014, Amended 2018) *(SSRP)*. Developed pursuant to section 13 of the *Alberta Land Stewardship Act.*

South Saskatchewan River Basin Management Plan, under the *Alberta Water Act.* (2015).

McElhanney Ltd, *Tecumseh Area Structure Plan,* 2025