

From: [Belen Scott](#)
To: [Laura Friend](#)
Subject: Rocky View County Response – Scott Pit Project Application
Date: Friday, March 28, 2025 5:09:13 PM
Attachments: [2025-03-28 Rocky View County Response Scott--Pit Project Application.pdf](#)

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Good afternoon, Ms. Friend,

Please find attached a letter from Chief Administrative Officer Reagan McCullough, the letter outlines Rocky View County has reviewed the Scott Pit Project application and remains concerned about its impact on residents. The County previously rejected similar applications in 1995, 2010, and 2020 due to strong community opposition, citing health risks, property devaluation, and reduced quality of life. The proposed site is within one mile of 389 homes, conflicting with County policies like the Municipal Development Plan and Bears paw Area Structure Plan. Additionally, the County is considering a full prohibition on new aggregate operations in the area, with a decision expected in 2025. The Aggregate Resource Plan also proposes a one-mile exclusion zone, which the Scott Pit does not meet.

If approved, the project must comply with the following key considerations and recommendations:

- Strict noise and air quality standards, including monitoring plans.
- A groundwater monitoring plan if extraction occurs near the water table.
- Enhanced reclamation planning for inactive sites.
- Possible additional land use restrictions if County policies are updated before the project proceeds.

Rocky View County appreciates the opportunity to provide input and welcomes further discussions. Please let us know if you require any clarification.

Best regards,

Belen Scott

Executive Coordination Supervisor

Rocky View County

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March 28, 2025

Laura Friend
Manager, Board Reviews
Natural Resources Conservation Board
4th Floor, Sterling Place
9940 - 106 Street
Edmonton AB T5K 2N2

Via Email: laura.friend@nrcb.ca

Re: Scott Pit Project Application (05-26-02-W05M)

Dear Ms. Friend,

Please accept this letter as Rocky View County's (the "County") formal response to the public notice issued on February 18, 2025 regarding proposed Natural Resources Conservation Board ("NRCB") application submission requirements for aggregate extraction at 05-26-02-W05M (the "Scott Pit") in Bearspaw.

Application Background:

Rezoning applications for aggregate extraction at the Scott Pit have been submitted to the County three times over the past 30 years (1995, 2010, and 2020). All three applications were refused by Rocky View County Council (the "Council"), with strong community opposition to each application brought forward. Notably, the public hearing to consider the 2020 application spanned over two days with 826 records comprising of letters, emails and video submissions received in opposition to the application. As you will be aware, the Bearspaw community has longstanding concerns over the potential impacts of the Scott Pit proposal, with particular concern over the effect of respirable particulate matter on health, property value decline, and other nuisances that will affect residents' use and enjoyment of their property.

Rocky View County Statutory Plans:

It is noted that Section 2 of the NRCB application requirements requires the proponent to identify all pertinent municipal policies and initiatives. For clarity, the County has set out its existing and forthcoming requirements below.

City of Calgary / Rocky View County Intermunicipal Development Plan:

As there are known sources of quality aggregate deposits along the County and City of Calgary boundary, the City of Calgary / Rocky View County Intermunicipal Development Plan (IDP) provides some policy regarding aggregate extraction. Section 12.0 of the IDP states that where an aggregate development is proposed within one municipality, considerations should be given on the potential impact to the other. The assessment of this aggregate development should not only take into account the impacts of Rocky View County, but also The City of Calgary. The City of Calgary / Rocky View County IDP can be viewed here: [City of Calgary / Rocky View County IDP](#).

Municipal Development Plan:

The County's Municipal Development Plan (MDP) provides high level guidance for aggregate development. Notably, Policy 15.1 requires that adverse impacts from aggregate resource extraction be minimized on existing residential dwellings among other areas.

With approximately 389 residential dwellings located within a one-mile radius of the subject lands, any assessment of aggregate development should consider the impacts on these dwellings. The County's MDP can be viewed here: [Municipal Development Plan](#).

Bearspaw Area Structure Plan:

The subject lands are located within the Bearspaw Area Structure Plan (ASP). The existing ASP provides the opportunity to consider new aggregate extraction only where the proposal can demonstrate that "the rural residential character of adjacent lands is not unduly negatively impacted or substantially altered".

Due to community feedback received from the previous Scott Pit Project applications and public engagement during the drafting of a new ASP, the County is proposing now entirely prohibit the approval of any rezoning application that facilitates provision of a new or expanding aggregate operation within the Plan area. This is reflected in Policy 9.1.1. of the draft ASP. The draft ASP will be considered again in Q2 2025 following a previous public hearing in January 2025. The draft ASP is available here: [Bearspaw Area Structure Plan](#).

Application Process:

Within the County's Land Use Bylaw, the extraction of aggregate resources is identified as *Natural Resource Extraction/Processing* use. In accordance with Section 299(f) of the Land Use Bylaw, any application for *Natural Resource Extraction/Processing* requires that land be redesignated to a new direct control district. Direct control districts are used for special land uses where general land use districts are not sufficient due to the unique regulations required.

Further, the MDP states that as part of an application to redesignate lands for the purpose of aggregate development, that an Aggregate Master Site Development Plan (MSDP) also be submitted. An MSDP is a non-statutory plan that details how an aggregate site will operate; the requirements of an MSDP are specified in Part 4 of Appendix C of the MDP. As per the Municipal Government Act (MGA), a public hearing is required to redesignate private lands within a municipality. At the public hearing Council would typically consider all submissions and speakers in support or opposition of an application.

Where Council approves the redesignation and MSDP application, an Applicant is then required to submit a development permit application for the extraction of aggregate. Additional development permits may be required to place any buildings or structures of the site at the discretion of the County's Development Authority. The County may specify conditions that are required to be met before the development permit is released and conditions that are to be met for the duration of the development permit. The County requires development permits for aggregate extraction be renewed every five years.

Aggregate Resource Plan Project:

The County has also initiated its own Aggregate Resource Plan (“ARP”) project to strike a balance between the continued need for aggregate and preserving the quality of life of residents. The ARP project is a framework, comprised of different documents and amendments to the existing Land Use Bylaw and MDP. It is anticipated that this framework will be presented to Council for consideration no later than the end of Q2 2025.

The County is proposing to establish locational criteria to restrict future aggregate extraction in sensitive areas. The County is proposing to have a 1.61 kilometre (one-mile) exclusion zone from all existing or future residential lands that are within an area structure plan. The proposed Scott Pit application is within this 1.61 kilometre buffer zone and would not meet the current requirements of the proposed locational criteria.

Additionally as part of the ARP project, the County has drafted an aggregate performance standards document to set thresholds that must be met for the duration of extraction activity and to outline application requirements. The document covers 13 subject areas that the County would consider important in managing the public and environmental impacts of aggregate extraction.

Additional Issues for Consideration:

Many of the subject areas being considered by the County are also identified in the NRCB application requirements. In the event the NRCB were to consider approval of the Project, the County recommends the NRCB considers the following items that were not identified in the application requirements:

1. Aggregate extraction operations shall not exceed noise levels of daytime operation for the lesser of either:
 - 55 dB LAeq (1-hour, free field); or
 - 10 dB above recorded ambient sound levels (measured as LA90)
2. An Applicant be required to submit a Noise Monitoring Plan to ensure that generated noise from the site would not exceed the thresholds outlined. The applicant would be required to submit monitoring reports to the County and outline any remedial action where it is deemed to no longer be within the appropriate levels .
3. The County proposes air quality standards in accordance with the guidelines of South Saskatchewan Region Air Quality Framework. Aggregate extraction operations shall be required to, at minimum, meet the following criteria:
 - PM_{2.5} 24-hour average 27 µg/m³;
 - PM₁₀ 24-hour average of 45 µg/m³;
 - TSP 24-hour average 100 µg/m³; and
 - all other air pollutants of concern shall be assessed, if required, against the thresholds stated within the Alberta Ambient Air Quality Objectives.
4. Similar to the above, an air quality monitoring plan shall be required as part of an application submission. Additionally, where extraction is expected to be undertaken at or less than 5.0 metres above the identified groundwater table, a groundwater monitoring plan would be required.

Ms. Friend
(Continued)

5. The Aggregate Performance Standards document also speaks to broadening the requirements of reclamation plans, along with requiring interim reclamation plans where a site is inactive for one year, over and above seasonal fluctuations in activity. Other areas that are considered include hours of operation, impacts to agricultural lands, and weed management. Please find attached a copy of the proposed performance standards for reference. The County encourages the incorporation of these standards.

Per Section 619(3) of the MGA, if the NRCB approves the Scott Pit project application, the County must grant any statutory plan or land use bylaw amendment within 90 days (or longer if agreed upon) upon receiving an application. However, if Council consider and approves components of the ARP project before an application is made, under Section 619(4), the County may address items not covered by an NRCB approval in the land use amendments hearing

The County appreciates the opportunity to provide a response to the Scott Pit project and looks forward to continued collaboration on what is an important issue for our residents. If you have any questions or require further information, please contact the undersigned.

Sincerely,
Rocky View County



Reegan McCullough
Chief Administrative Officer