

Foothills Crossing ASP

Town of High River Engagement Summary



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Introduction

Foothills County is committed to engaging with citizens and stakeholders when undertaking planning processes. We also recognize that when planning projects are undertaken in Intermunicipal Development Plan (IDP) areas it is of particular importance to communicate and collaborate with our municipal neighbours.

The Foothills Crossing Area Structure Plan (ASP) is located within the plan area for the Foothills County and Town of High River IDP which means that it must conform to this higher order plan. The Town had identified interests with respect to the plan area during the IDP development process and the IDP lays out some joint planning projects to address these interests.

The Town of High River was thus identified as a key stakeholder in the development of this ASP and the process through which they would be included in the planning process was described in the project's engagement strategy.

This report summarizes the activities undertaken with the Town in the years leading up to the project and throughout the plan development process.

Background

The Foothills Crossing (ASP) will guide future development of a commercial area on the east side of Highway 2 between the Highway 23 and 498th Avenue interchanges, near the Town of High River. The Plan Area is shown in Figure 1. Below.

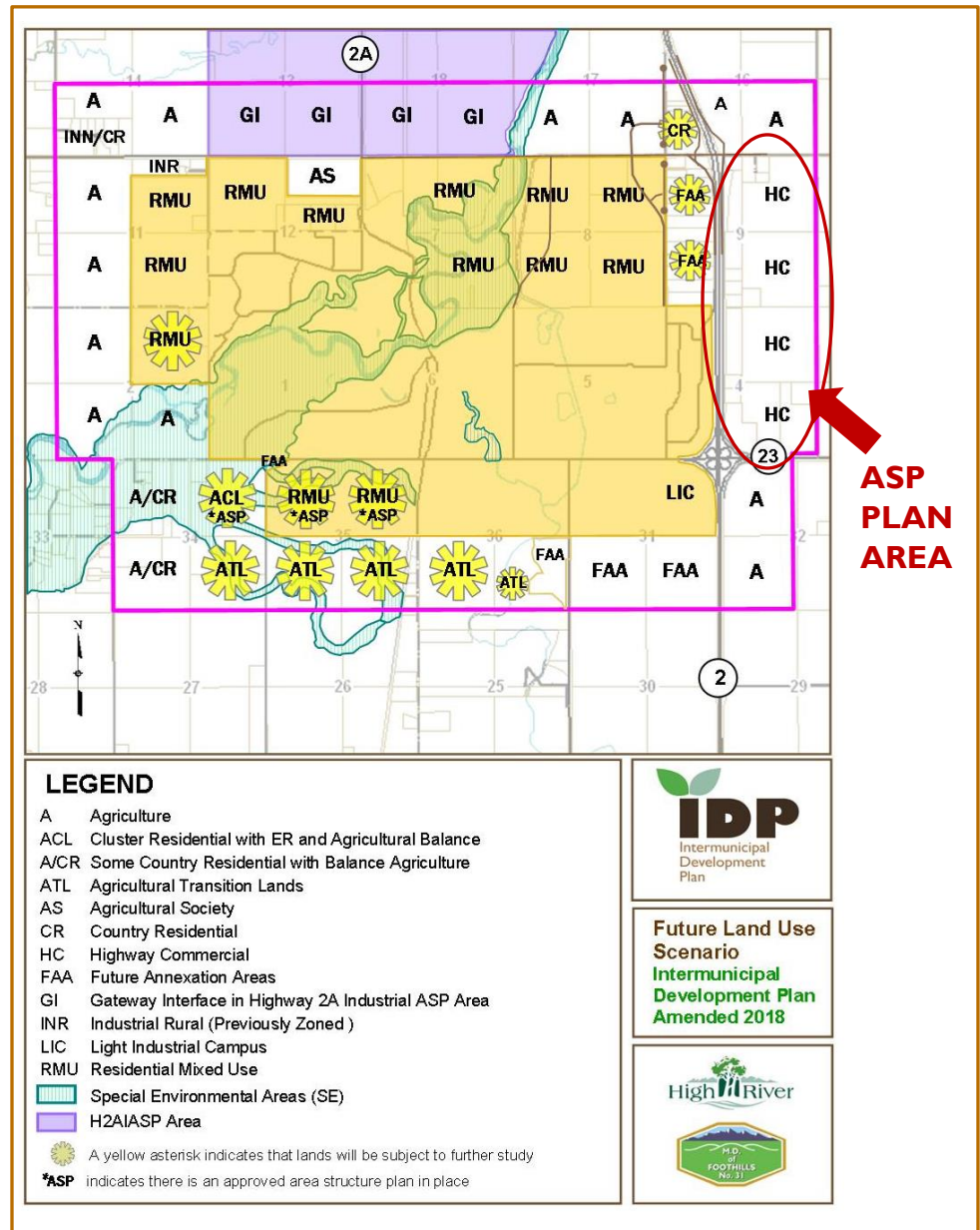
Figure 1. Plan Area Map





The Plan Area for the proposed ASP was identified in the Foothills County and Town of High River Intermunicipal Development Plan in 2012 as a future highway commercial area. In 2020 Foothills County Council decided the time was right to create an Area Structure Plan for the area to ensure orderly and appropriate development. April 29, 2020 Foothills Council approved a Terms of Reference to undertake the ASP project and subsequently approved an Engagement Strategy.

Figure 2. Foothills County Town of High River IDP Future Land Use Scenario Map



Engagement Summary

ASP Engagement Strategy

The Engagement Strategy for the Foothills Crossing ASP project outlines the objectives and principles for engagement and distinguishes between stakeholder engagement and public engagement. It identifies the stakeholders for the project as:

- Landowners within and adjacent to the plan area,
- Alberta Transportation, and
- The Town of High River.

The strategy lays out a process for engagement activities in 4 phases:

Phase 1 – Stakeholder Awareness and Identification of Issues

Phase 2 – Public Awareness and Evaluating Options

Phase 3 – Feedback on Draft Plan

Phase 4 – Public Hearing and Approval Process

This report summarizes engagement activities with the Town of High River both leading up to the project and through all four phases of the project's engagement process.

Engagement Prior to Project Initiation

Town of High River and Foothills County IDP

There were some discussions between Foothills County and the Town of High River regarding the south end of the Plan Area around the time of the adoption of the High River Highway Commercial Area Concept Plan in 2004. However, it was during the process of creating the Foothills County and Town of High River Intermunicipal Development Plan in 2011 and 2012 that the two municipalities began to discuss the entire Plan Area as a potential future highway commercial development area.

At that time, construction of 498th Avenue was already underway with a bridge over the Highwood River which would connect Highway 2A and Highway 2 and the interchange construction at Highway 2 was planned for

the 2012 construction season. Construction of the 498th Avenue overpass would create a 3 km stretch of Highway 2 frontage with a grade separated interchange at each end. This was viewed as an excellent opportunity for future commercial development.

While the Town agreed that the location afforded significant opportunity, they identified interests in protecting their own tax base and businesses in the Town as well as ensuring the visual character of the area. For this reason, 4 joint projects were identified in the IDP relating to this area:

- Undertake a joint economic development study to determine what types of uses would be most appropriate for the area and provide the greatest mutual benefit;
- Investigate the possibility of entering into some sort of servicing agreement relative to the area;
- Enter into negotiations for a revenue sharing agreement relative to a commercial development on the site; and
- Undertake the development of some design guidelines relative to gateway areas.

Intermunicipal Committee Discussions

After the adoption of the IDP but prior to the initiation of the Foothills Crossing ASP project there were discussions regarding the Plan Area at the IMC on a number of occasions:

- **March 6, 2014** – Foothills County administration made a presentation to the IMC regarding proceeding with a planning framework for the Plan Area. The IMC approved a motion to allow the two planning departments to further explore opportunities for Highway Commercial Development in this area.
- **January 8, 2015** – Mayor Snodgrass brought an item to IMC for discussion regarding the development of the Direct Control District lands in the High River Commercial Centre Area Concept Plan (ACP) at the south end of the Plan Area. The developer who owned the lands was looking for support from the Town to proceed with development.

Foothills County administration explained to the IMC that at the time the ACP was approved there was a tentative agreement with the Town to extend piped servicing to the area. Since that time the developer had also explored on-site servicing. The County indicated that in order for development of these lands to proceed, the developer would either need to secure servicing from the Town or provide private water and

wastewater servicing utilizing a licensed ground water source and enhanced septic systems.

- **May 2, 2019** – IMC discussed undertaking a joint economic development study for the area as identified in the IDP. This was in response to discussions between administrations from the Town and the County regarding the need for this work to be completed if non-agricultural development was going to be supported in the Area.
- **September 12, 2019** - Foothills County Council expressed an interest at the IMC in undertaking an Area Structure Plan for a future commercial development in the Plan Area. The IMC discussed issuing a joint RFP for the economic development study contemplated in the IDP.
- **December 5, 2019** – Two development permit applications in the Plan Area were brought to IMC for discussion. Foothills County indicated a desire to proceed with the joint economic development study to fulfill the requirements of the IDP so that work on a plan for development of the area could be supported. The mayor of High River indicated that he was pleased to see the ASP and the economic development study were coming together.
- **March 12, 2020** – The Town of High River brought forward 2 motions that had been approved by Town Council for discussion by the IMC:
 - The Town would waive the requirement for the economic development study for the Plan Area on the condition that the County approve an ASP for the area.
 - In the interim Town administration were directed to work with the County to develop a MOU indicating an approximate timeline for the ASP and the scale of development that may be supported in the interim.

No motions were proposed or approved by the IMC at that time. In the interest of proceeding with the ASP project in a timely manner, in April Foothills County approved a Terms of Reference for the ASP project which included a detailed schedule for completion of the work.

- **September 3, 2020** – IMC approved a motion that the IMC request a formal response from Foothills County Council detailing how applications will be dealt with in the plan area prior to the ASP being adopted. A few days later on Sept 9, Foothills County Council acknowledged the request from the IMC and indicated that any

applications in the Plan Area would be circulated to the Town in accordance with the IDP.

Engagement During the IDP Project

Phase 1 Engagement

In August 2020 in accordance with the approved engagement strategy for the project, initial stakeholder engagement was undertaken with landowners from the Plan Area, the Town of High River and Alberta Transportation. The purpose was to introduce the project to stakeholders and to explore potential interests, issues or concerns they may have.

A virtual meeting was held with administration from the County and the Town. Town staff had questions or comments regarding the following:

- The County choosing to approve the terms of reference for the project rather than undertaking a memorandum of understanding with the Town as had been suggested by the Town at the March Intermunicipal Committee. They noted that the terms of reference did not address the scope and scale of development to be supported in the interim.
- The decision to delay undertaking a detailed servicing study.
- That notwithstanding the joint projects laid out in the IDP, the Town has no interest in extending piped servicing to the area.
- The Town's biggest concern is allowing piecemeal development to proceed.
- The Town has concerns regarding establishing businesses in the Plan Area that would be in direct competition with businesses in downtown High River.

Phase 2 Engagement

From September 2020 to February 2021 Foothills County staff and the technical consultants undertook a site analysis, preliminary technical study and the development of two preliminary land use / transportation concepts.

In April, both a stakeholder and public engagement on the two preliminary concepts was undertaken. On March 30, 2021 an email was sent to Town of High River administration outlining progress on the ASP to date, and directing them to the project page on the County's website where detailed

information was available. An offer was extended for a virtual meeting should the Town wish to discuss the work to date and provide input.

May 3, 2021 a written response was provided by Town administration. The letter is included in this report as Appendix A. In the letter the Town provided written comments regarding their interests in the project. There were some questions regarding land use, stormwater and design guidelines which were subsequently addressed in the draft ASP document. Due to staffing changes at the Town, the letter mistakenly indicated that the Town had not participated in Phase I of the engagement strategy, however this was not the case. The response letter reiterated the Town's position with respect to servicing the Plan Area, indicating that they were not interested in providing piped services to the area and requested that the two concept options be presented at an IMC meeting. However, the two options had already been presented along with the project vision and objectives to IMC as part of a project update at the Committee's March 4, 2021 meeting.

Phase 3 Engagement

Sept. 22, 2021 – County Council directed administration to undertake Phase 3 engagement on the draft Area Structure Plan Document. The Town of High River was given six weeks to review the full draft document and provide comment. This was not intended to be a formal circulation rather it was framed as a pre-application review to identify potential issues prior to the formal circulation. The Town provided comments regarding the draft ASP, the bulk of which centered around the County considering approving the ASP and allowing Phase I of the ASP development to proceed prior to completing a "Servicing Functional Report". The Town's response letter is included in this report as Appendix B.

Foothills County administration provided a written response letter which is included in this report as Appendix C and the Town's comments were included in the Phase 3 engagement report that was presented to Foothills County Council on December 15, 2021. In order to address some of the Town's comments, with Council's direction, changes were made to policy in the ASP reiterating that future development would comply with the IDP, and adding a time frame for work to commence on the design guidelines for the area in consultation with the Town.

January 13, 2022 the Town of High River and Foothills County IMC was given a presentation on the draft ASP. The pre-application circulation was discussed and the Town's Phase 3 engagement response letter as well as the County's reply were provided to the Committee. The County's decision regarding postponing the servicing study was discussed and

County administration indicated that approving the proposed ASP which allows for the first phase of development to proceed with on-site servicing options would enable a planning framework to be put in place for the area in a timely manner. The plan speaks to providing for future servicing by incorporating utility right of ways into road design and utilizing deferred servicing agreements to ensure phase 1 development is connected to piped servicing once available. The plan clearly indicates that piped servicing must be in place prior to phase 2 of development proceeding and also that phase 2 will require an ASP amendment.

The Town spoke to their concerns regarding competition with businesses within the Town. Foothills County IMC members and administration outlined how they believe that the Foothills Crossing area can be complementary to businesses within the Town. It is anticipated that the area will provide an appropriate location for businesses that may not be desirable within the Town, such as farm implement dealerships and that it may also bring visitors / customers to the Town if uses such as a tourist information centre, large truck stop, campground or equine recreation facility were developed in the Plan Area. Foothills County IMC members indicated that they believe that development of this area can benefit both the County and the Town.

Phase 4 Engagement

In accordance with the approved engagement strategy for the project, Phase 4 engagement was comprised of a 30-day formal agency circulation and public hearing. Town of High River administration were sent a digital copy of the proposed ASP document and provided with links to the supporting Traffic Impact Assessment and Stormwater Report on February 17, 2022 which were posted on the County website. The Town was given the standard 30-days to provide a formal response.

On March 17, 2022 the Town provided a written response letter which is included in this report as Appendix D. The Town commented on the lack of a servicing study for the ASP, their position that the ASP should contain policy preventing future development that may compete with businesses in the Town and indicated that they do not feel the ASP meets the services objectives in the CMRB Interim Growth Plan. They did not request that the ASP go to the Intermunicipal Committee for further discussion and did not speak to initiating a dispute resolution process. The letter was provided to Foothills County Council as part of the public hearing that was held regarding the ASP on March 23, 2022.

Conclusion

Because the Plan Area for the Foothills Crossing ASP is located within the Town of High River and Foothills County IDP area, it was important that the two municipalities communicate and collaborate during the development of the ASP. As such the Town was identified in the engagement strategy for the ASP as a key stakeholder.

The Town was engaged in all 4 phases of the engagement strategy and the County made efforts to address the interests the Town had identified in the Plan Area during the development of the IDP in 2011 -2012 as well as those identified during the ASP engagement.

Some of the efforts to address the Town's interests are as follows:

- One of the guiding principles of the ASP is to “Be mindful of potential impacts to the Town of High River’s interests as outlined in the IDP as well as potential impacts to the Town’s stormwater management system”.
- Section 8.4.3 of the ASP speaks to the County’s willingness to undertake negotiations regarding revenue sharing in the Plan Area.
- Policy 6.2.1.4 ensures there will be no negative impacts to the Town’s stormwater management infrastructure;
- There are also specific statements and policies included in the ASP that speak specifically to interests and concerns that were identified by the Town during the ASP development process:
 - Section 1.5, Section 3.3.2, Section 6.1, and Section 8.4.3, all speak to the County’s understanding that the Town of High River does not wish to provide piped servicing to the Plan Area;
 - Policy 6.1.1.1 indicates that the County will continue to explore piped servicing options for the Plan area;
 - Policy 6.1.1.3 indicates that piped servicing will be in place prior to Phase 2 of development proceeding;
 - Policies 4.3.7.1-4.3.7.9 specify the types of uses and the land use districts under Foothills County’s Land Use Bylaw that may be supported in the various policy areas illustrated in the development concept;
 - Policy 8.4.5.1 commits to commencing work on design guidelines for the plan area in consultation with the Town within 1 year of approval of the plan;
 - Policy 8.4.5.2 ensures future development in the plan area is in accordance with the IDP; and

- Policy 8.4.5.3 indicates that the County will refer planning applications to the Town in accordance with the IDP.

The Town of High River was identified as a key stakeholder in the development of the Foothills Crossing ASP and have been engaged throughout the planning process as part of a structured engagement process. While the Town has consistently provided comments and concerns regarding the project they have not indicated that they did not wish the County to proceed and have not requested that the dispute resolution protocols outlined in the IDP be initiated. Foothills County have endeavoured to address the Town's interests in the Plan Area throughout the plan development process and will continue to do so as the ASP is implemented.

Appendix A: Phase 2 Engagement Response Letter from the Town of High River



309B Macleod Trail SW
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www.highriver.ca

May 3, 2021

Emailed only

Foothills County
309 Macleod Trail
High River, AB T1V 1M7
Julie.mclean@foothillscountyab.ca

Attention: Julie McLean – Senior Planner

RE: Highway 2 East Side Area Structure Plan – Phase 2 Engagement Response

Thank you for providing the Town of High River with the opportunity to comment on the two concept options drafted for the Highway 2 East Side Area Structure Plan (ASP).

The land area is identified in the IDP as Highway Commercial (HC) and is located within Joint Planning Area #2. The Town notes the proposed land use districts for the concept options appear to meet the intent of the HC designation of the IDP. There was indication in the video presentation provided by the County that the “more industrial” uses if the Business Park District would be prohibited. Would the County please provide a list of the uses from the Business Park District that are proposed to be prohibited from the ASP?

As the Town did not participate in a telephone interview or provide a formal response in Phase 1 of the County’s Engagement Strategy, the Town would like to take this opportunity to reiterate its interests noted in the IDP, which are to ensure the subject lands are developed to a high-quality aesthetic. Would the County please confirm how design guidelines for the ASP will be addressed?

Also, the video presentation of the concept options indicates the potential for stormwater impacts to Town lands, but it is unclear. Would the County please clarify if any substantial stormwater impacts to Town lands are anticipated, and if so, if either concept option helps to mitigate such impacts?

Further, the Town notes that no information on water and wastewater servicing was provided in the presentation, however there is an ASP Objective to “*accommodate the opportunity to connect to piped servicing should it become available*”. At this time, please be aware High River does not support extending Town services to the subject lands to support development of the ASP. To ensure stakeholders have certainty on servicing options, the Town suggests the County considers clarifying in the ASP that piped servicing will not be provided from the Town.

Based on the information provided by the County, the Town confirms it currently does not prefer or object to either concept option. In accordance with 5.2 of the County's Engagement Strategy, we kindly request the County considers presenting these concept options to the IMC at the regular meeting in June 2021.

Should you have any questions on the above comments, please do not hesitate to contact the undersigned.

Respectfully,



Breelyn Joyce, RPP, MCIP
Planner II
Planning & Development Services Division
Phone: 403.603.3533 | Email: bjoyce@highriver.ca

Appendix B: Phase 3 Engagement Response Letter from the Town of High River



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November 19, 2021

Emailed Only

Foothills County
Attention: Julie McLean
309 Macleod Trail
High River, AB
T1V 1M7

RE: Highway 2 East Commercial Area Structure Plan

Thank you for providing the Town of High River with the opportunity to provide initial comments on The Draft Foothills Crossing Area Structure Plan (ASP). The intent of the proposed ASP is creating a planning framework to guide development of the lands located along Highway 2.

As the lands is located within the County/Town's intermunicipal boundaries, it is important, therefore, that the content of the ASP aligns with the current Town/County Intermunicipal Development Plan and Town's expectations.

The Town of High Rive has now completed the review of the proposed draft ASP and have the following comments:

1. The draft ASP does not include a Servicing Functional Report, which is a critical component of the proposed ASP, for facilitating development within the Plan area. In the absence of sufficient information about the Servicing Functional Report, our comments remain preliminary, short, and incomplete.
2. Although one of the guiding principles in the ASP indicates "Design with future provision of piped servicing in mind", nothing in the proposed ASP supports this statement.
3. The ASP indicates that it will outline the future infrastructure requirements for the area. What is the timeline for that future? A reasonable servicing study should be included as part of the ASP, without this additional information it limits the comments that the Town is able to provide.
4. As the Intermunicipal Development Plan (IDP) is a key statutory document for the two municipalities, using statements like "*Be mindful of potential impacts to the Town of High River's interests as outlined in the IDP*", may not be sufficient. The Town recommends adding an objective about identifying the required servicing infrastructure according to the proposed land use. This proposed objective would provide clear direction, instead of leaving it wide open to the future. Adding additional information into the ASP about potential servicing of the area would provide criteria for evaluating whether the proposed development would be sustainable.

5. The Town recommends that one of the objectives of the ASP should ensure that only appropriate developments that cater to travelers along this highway commercial corridor are accommodated. This objective would protect to a great degree the Town's interest in avoiding promoting competitive development within the corridor.
6. The ASP has indicated the requirements of developing design guidelines in the future and suggests applying the Highway 2A corridor existing design guidelines in the interim for evaluating development within corridor. It is critical to add a policy in the ASP highlighting the preparation of the required design guidelines in consultation with the Town of High River, along with a potential timeline for creating these design guidelines.
7. What are the uses that provides services to the travelling public and agricultural sector? It would be helpful if these uses could be identified to avoid future confusion.
8. The Guiding Principles indicate design with piped servicing in mind, yet there isn't any servicing study completed or required for supporting development within the plan area.
9. Has a Traffic Impact Analysis (TIA) been completed to support development of the Plan area? If not, what are the rationales behind the proposed transportation improvement ideas? Will a TIA be required at a future stage of development?
10. The Plan Area is also included in an area that was identified in the CMRB Growth Plan, as a Joint Planning Area, between Foothills County and the Town of High River. In the Growth Plan, JPAs are Preferred Growth Areas, where *"future planning should strive for fully serviced urban neighborhoods and Employment Areas where people will be able to walk to everyday needs, or to transit for longer-distance trips"*. The proposed ASP does not illustrate how this objective could be met.
11. With new traffic signals, the Town would like to see "Emtrac system" installed to avoid slowing down response times east on HWY 23.
12. As hydrants will be critical for supporting the proposed development, the required water supply for firefighting has not been provided and/or identified.
13. The proposed ASP does not provide an answer to Objective 1.a. of the Interim Growth Plan (IGP), which states: *"Promote the integration of land-use and infrastructure planning"*. The Plan area is without sufficient provisions linking land-use and infrastructure, and inadequate growth management policies to minimize impacts on the environment.

In closing, we are concerned that the implementation of the ASP without the required servicing study, could result in development that is not consistent with the IGP.

Based on best planning practices, it would be helpful to see the proposed ASP provide policy controls for requiring completion of the servicing study and related technical studies prior to approval of the ASP.

Once again, we thank you for the opportunity to provide comment and we look forward to continuing to work collaboratively with Foothills County for the benefit of both of our municipalities in the future.

Please do not hesitate to contact the undersigned should you have any questions or concerns.

Respectfully,



Khalid Mohammed, RPP, MCIP, LEED AP ND
 Manager of Planning and Development Services Division

Appendix C: Foothills County's Reply to the Town's Phase 3 Engagement Response



FOOTHILLS COUNTY

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Dec 1, 2021

Via Email:
KMohammed@highriver.ca

Khalid Mohammed
Manager of Planning and Development Services Division
Town of High River
309B Macleod Tr. S.W.
High River, AB
T1V 1Z5

Khalid

Dear ~~Mr. Mohammed~~:

RE: Town of High River Comments regarding draft Foothills Crossing Area Structure Plan

Thank you for providing your comments by letter dated November 19th, 2021, on the draft Foothills Crossing Area Structure Plan (ASP). We would note that we do not consider these comments to be "initial" as we have provided the Town the opportunity to provide comments previously in both Phase 1 and Phase 2 engagements for the project. As the Town outlined a number of concerns, we felt it appropriate to provide you with a response.

Your comments numbered 1,2,3,4,8 and 12 relate primarily to the County's decision to defer the piped water and wastewater servicing studies until Phase 2 of development. In the ASP document we indicate that there are too many unknowns with respect to piped servicing to develop a comprehensive plan at this time. As you are aware, the Town of High River requested that the County undertake the development of the ASP. In addition, the Town has indicated that they are not willing to provide any utility servicing to the ASP area. The County believes that the ASP is critical to establish the planning framework for future development and allow for future utility servicing. The ASP contains multiple provisions to ensure development in both phases will be fully serviced over time.

With respect to fire protection, it is not necessary to have piped water to provide for fire protection. The requirements of the fire code can be met utilizing man-made ponds or cisterns with hydrants. Development in the plan area will have to meet all safety code requirements.

In your comment number 4, you also speak to the importance of the IDP as a key statutory document. In recognition of this, we propose adding a policy to Section 8.4.5 indicating that all future development in the area will be undertaken in accordance with the IDP.

Your comment number 5 recommends the addition of an objective ensuring that only development catering to travelers along the highway would be accommodated to avoid promoting development that would compete with businesses in the Town. We do not feel that this is a reasonable request and will not be able to accommodate it.

Your comment number 6 suggests adding a policy highlighting the development of design guidelines for the area in consultation with the Town along with a timeframe for the creation of the

guidelines. There is already a policy in Section 8.4.5 (which is unfortunately mis-numbered in the draft document as Policy 8.5.5.1) that indicates that we will, in consultation with the Town and Alberta Transportation develop design guidelines for the area. We are amendable to adding a timeframe indicating that we will commence this work within one year of the adoption of the ASP.

Your comment number 7 asks for additional information regarding the uses that would be supported in the plan area. In Section 4.3 of the ASP, the land use districts that are contemplated for each development type shown in the Land Use Concept are listed. Each of these districts in our Land Use Bylaw has a list of permitted and discretionary uses as well as definitions.

Your comment number 9 inquires as to whether a Traffic Impact Analysis has been completed. We have retained ISL engineering, who have been working with us throughout the project on transportation and stormwater management. They will be completing their reports shortly and these will be provided to the Town as part of the formal circulation of the ASP in advance of the public hearing.

Your comment number 10 references provisions regarding preferred growth areas from the CMRB Growth Plan. We are cognizant of the policy in the Growth Plan, and we feel that this ASP is in compliance with the CRMB Growth Plan.

Your comment number 11 requests that the ASP specify the type of traffic signals that will be installed at the intersection on Highway 23. This is beyond the level of detail that we would typically include in an area structure plan. In addition, as this intersection is on a Provincial highway, it is unlikely that the County will be able to dictate the system that is installed.

Your comment number 13 asserts that the draft ASP does not meet objective 1.a. of the CMRB Interim Growth Plan (IGP) regarding the integration of land-use and infrastructure planning. Principle 1 in the IGP is to "*Promote the integration and efficient use of regional infrastructure*". Foothills County feel that planning for commercial development on lands adjacent to a major transportation corridor with an interchange at either end is a very efficient use of existing regional infrastructure. The ASP postpones the piped water and wastewater servicing strategy for the area but requires the County to continue to explore options for piped serving, requires piped servicing and a statutory plan amendment prior to Phase 2 of development proceeding, provides for deep servicing to be accommodated within road rights of way and requires deferred servicing agreements for Phase 1 development (Policies 6.1.1.1-6.1.1.5).

Should you wish to discuss the proposed ASP or our response to your comments, please contact us to arrange a meeting.

Sincerely,

FOOTHILLS COUNTY



Digitally signed by Julie McLean
DN: cn=Julie McLean, o=Foothills
County, c=AB, email=Julie.McLean@foothillscourab.ca
reason: I am approving this document
location: your signing location here
date: 2021.12.01 09:38:56-0700
RFX PDF Editor Version: 11.1.0

Julie McLean MEDES. RPP MCIP
Senior Planner

Appendix D: Formal Agency Circulation Response From the Town of High River



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March 17, 2022

By Email Only

Foothills County
Attention: Julie McLean, Senior Planner
309 Macleod Trail SW
High River, AB
T1V 1M7

RE: Draft Foothills Crossing Area Structure Plan

Thank you for responding to our initial comments and for addressing some of our concerns. The Town of High River appreciates the opportunity to provide comments on the Draft Foothills Crossing Area Structure Plan (ASP).

As the land is located within the County/Town's intermunicipal boundaries, it is important, that the content of the ASP aligns with the current Town/County Intermunicipal Development Plan and the Town's expectations.

The Town of High River has now completed the review of the proposed draft ASP and have the following comments:

1. Although the County has provided a rationale regarding moving forward with the development of the area in Phase 1 without the required servicing study, we respectfully believe that land use and servicing are inextricably linked and without servicing in place, it would be difficult to promote sustainable development in our region.
2. Regarding the proposed developments along this corridor, the Town maintains its position and recommends that one of the objectives of the ASP should ensure that only appropriate developments that cater to travelers along this highway commercial corridor are accommodated. This objective would protect to a great degree the Town's interest in avoiding promoting competitive development within the corridor.
3. Based on the information and rationale provided, we believe that the proposed ASP does not illustrate how it meets the services objectives of the Calgary Metropolitan Regional Board's (CMRB) Interim Growth Plan (IGP). The Town is concerned that the implementation of this ASP without the required servicing study, could result in development that is not consistent with the IGP and/or facilitate non-sustainable development within our region.

Once again, we thank you for the opportunity to provide comments regarding the proposed ASP. Should you have any questions please do not hesitate to contact the undersigned.

Respectfully,

Khalid Mohammed, RPP, MCIP, LEED AP ND
Manager of Planning and Development Services Division