



**TOWN OF CANMORE
RECORD OF WRITTEN SUBMISSIONS
Public Hearing**

Council Chamber at the Canmore Civic Centre, 902 – 7 Avenue
Tuesday, September 3, 2024 at 9:00 a.m.

This document contains the written submissions received in response to the notice of public hearing for the following bylaw:

**Town of Canmore Municipal Development Plan Amendment Bylaw 2024-07
– Discouraging Employee Housing in Industrial Areas
and**

**Revised Land Use Bylaw Amendment 2024-08
– Removal of Employee Housing from Industrial Districts**

Submissions are sorted in alphabetical order. If you are viewing the electronic version, please use the bookmarks feature to scroll through the document.

This record of written submissions was compiled by Ben Stiver, Municipal Clerk, on September 3, 2024.

From: [Steve Ashton](#)
To: [Shared.MunicipalClerk](#)
Subject: Bylaws 2024-07 and 2024-08 - Removal of employee housing from IND2
Date: August 30, 2024 8:45:38 AM
Attachments: [Outlook-5lnkumze.png](#)

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Dear Council and Mayor,

I am writing to you today to express my concern for these above mentioned bylaws and to offer some history and expertise on this that I have gained over the last few years while working on getting some employee housing developments approved and built in Bow Meadows Cres. The employee housing projects that we have worked on and built are located at [REDACTED]

I am the president and CEO of Ashton Construction. Ashton Construction is the largest local construction management firm in the bow valley and we employ over 30 full time staff and also indirectly employ over 600 local trade, supplier, engineering, design, etc. employees through our hiring of subcontractors and the carrying out of our work. We also build and support local small businesses in the retail, F&B, office, medicare, commercial, industrial sectors of Canmore and understand their needs as they strive to grow, remain feasible and remain viable.

I am also a director of BOWDA, an active member of the chamber of commerce and past chair of CCH.

My wife and I also own multiple properties in Bow Meadows Cres. Although none of them have employee housing on the 2nd floor and they are all either used as office, storage and in one case a gym, I believe that employee housing or dwelling units is a viable and good use for 2nd floor in industrial areas where the hazard is low and the use on main floor is clean, light industrial such as the case in Bow Meadows Cres.

I have walked the neighborhood and talked to my neighbours about this issue and the majority of them agree that employee housing when built correctly and built to code and on 2nd floor is a good solution to help them with staffing shortages, housing employees and most businesses and property owners agree that they have staff that would love the opportunity to live in this type of housing. During the SDAB hearing for 127 Bow Meadows (Canglass), I provided over 10 letters from neighboring businesses all in support of the employee housing units that Kris was building because they were subsidiary to his business, they didnt take away from main floor industrial and they were contained within his property and addressed all of the required life safety ,

Below are the points that I would like to bring up;

1. CCH has a current wait list of 264 on the home ownership and 189 on the rental. Thats

453 individuals or families looking for a place to live. Recent studies that the town of Canmore has had completed indicate there is a shortfall of 1000 affordable housing units in Canmore. Why are we removing a viable source of housing from a district. In the past 2 years, over 40 housing unit's have been added to industrial areas in Canmore and we have heard from people living in these units at a public town hall that they are very appreciative of these units. In one case, a business in Canmore that was able to build employee housing units for its staff is able to be more sustainable. Do we not care about promoting small business in this community and addressing our housing crisis. I understand this is not the entire solution but adding 40 units is still helping to solve the problem.

2. The Town of Canmore MDP indicates that we should promote a variety of housing and promote industry provided housing. It's important to note that industry provided housing is not subsidized by tax payers or funded by government programs or grants or done with free lands provided by tax payers. It doesn't cost the town of Canmore anything and it allows industry or the market place to solve its own problems. This also limits travel of employees from outside Canmore, reduces vehicles on the highway, promotes the use of local transit, and keeps people in our community. This also allows businesses that are important to Canmore stay viable. There are many other points that can be made here but a good example is the Rocky Mountain bagel company that is just looking at cost effective ways to build or own more staff accom and the Elk meadows development is a good option for them. They will expand their bakery on the main floor and build housing for staff on the 2nd floor.
3. The Indian Flats ASP clarifies that the intent of bow meadows was always clean, light industrial. Light industrial is compatible with residential and can be adjacent to it as per the Alberta building code.
4. As per the Indian Flats ASP, the area east of Elk Run including bow meadows cres should be IND1 and allow dwelling units.
5. If the town wants to make large changes to bow meadows that differ from the current ASP, they should embark on revising or updating the current ASP first and get public engagement. My concern is that by classifying Bow Meadows as IND2, you are classifying it similarly to Boulder Cres which is for high hazard and being that Bow Meadows already has employee housing and all uses are light industrial, IND1 makes alot more sense for Bow Meadows Cres.
6. There have been many improvements made over the years to add sidewalks and pedestrian connectivity such as the new sidewalks that Elk Meadows will be putting in as well as 121 Bow Meadows is doing as part of the approval process of the projects.
7. The approved and discretionary uses in IND1, TID and SB should be limited to F1 and F2 lower hazard industrial uses rather than this undefined term of "light industrial" as the definitions of all the uses under F1 and F2 in the Alberta building code are much more concise and understandable. F1 and F2 occupancies are also compatible with residential. All of the occupancies currently in bow meadows cres are either F1 or F2.
8. IND2 which should be contained to west of elk run should be the place for F1, F2, but also F3 and F4 uses which are high hazard industrial occupancies where you are not

allowed to have residential adjacent as or the Alberta building code. This is where distilleries, welding shops, etc. which are already located in this area belong.

9. In regards to the dwelling units; the max GFA should be increased to 49% in my opinion so that the entirety of the 2nd floor in a unit can be used as a dwelling. The stc max rating should also be removed and should just follow the requirements of the Alberta building code or typical industry standard stc ratings as the stc rating they have listed is excessive and not possible. The STC rating that is listed is quieter than a dishwasher and is not possible to achieve. The building code spells out what is required for STC ratings between residential and industrial or commercial and that is what should be followed rather than something that is impossible to achieve. The dwelling unit should be subservient to the business in the same unit. The dwelling unit should only be on 2nd floor to ensure main floor is preserved for industrial or commercial. The dwelling units should not have max sizes and that should be removed.
10. We need to ensure that all existing approved employee housing units are grandfathered and considered compliant if this bylaw passes to preserve the housing forever and protect the property owners rather than them be legal non-conforming.

In summary, my main points here are to make sure we include Bow Meadows Cres in the IND1 district just like the Elk Meadows development has been included in that district. Bow Meadows Cres already has approved residential housing on the street and there are no high hazard industrial uses in Bow Meadows currently. Even RMSC (which I have built) and Wildlife (which I have built) are all lower hazard industrial (F2) which is compatible with residential, the place for higher hazard is west of Elk Run on Boulder cres which I agree should be zoned as IND2 with no residential. I also agree with the changes to TID, SB and IND1 but think the definitions of dwelling unit and specific parameters should be honed in to make the neighborhoods even better than they already are.

Thank you for taking the time to read my email.

Have a nice long weekend!

Sincerely,

Ashton Construction Services Inc.

Steve Ashton, C.E.T., LEED AP, N.C.S.O.
President & CEO
Office: 403-688-3500



**I check email twice daily at 9 a.m. and 4 p.m. MST. If your matter is urgent, please call or text me.



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From: [Cam Baty](#)
To: [Shared.MunicipalClerk](#)
Subject: Bow meadows crescent changes to bylaw
Date: August 30, 2024 10:18:15 AM

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Dear Council and Mayor,

I am writing you in relation to the proposed change of use within bow meadows crescent for second floor housing.

We employ roughly 100 people in Canmore (mostly in Bow Meadows Crescent) and own the properties at [REDACTED] and 7 of 8 bays at [REDACTED]. We are also a 1/3 owner of the project at [REDACTED] in addition to being the purchaser of 6 bays for further Rocky Mountain use within the [REDACTED] project.

I know that mixing housing and industrial is a tricky issue. As a future owner of industrial space below residential, I am not without concern for future potential issues between residential and industrial uses. Having said that, housing is the #1 issue in the valley in my opinion and worth leaving on the table as a future solution within Bow Meadows Crescent. Our building at [REDACTED] is suitable for a second floor in the future. We have always held off on building a second floor in order to ensure we use the space for the best use possible in the future. To date, we've been able to recruit team members without providing employee housing and hope to continue doing so by providing a good work environment and wages that can allow people to find accommodations. We also try and avoid non permanent resident / seasonal team members that need housing. Our goal is to continue to solve our needs in that way but that may not always be possible. As both a land owner and a business owner in Bow Meadows, I believe it is important to have the option to have staff housing in the area. Although we hope to avoid it, we may need to put staff housing on top of [REDACTED] [REDACTED] in the future to enable us to continue to grow and maintain our operations in Canmore. I would hate to see that not being an option and having to move our operations elsewhere if this became a big issue.

I understand that housing in industrial areas isn't an ideal solution, but it may be a necessary and important one. Where would the people currently living in Bow Meadows Crescent live if they didn't have those accommodations?

My hope is that you continue to allow employee housing as an option in Bow Meadows Crescent.

Feel free to reach out if you have any questions.

Sincerely,

Cam Baty
Co-Owner
Rocky Mountain Soap Company



Rocky Mountain Soap Co. | rockymountainsoap.com
SIMPLE, NATURAL INGREDIENTS.

NOTE: I batch process my emails weekly so it may take several days to get back to you. If it's urgent, please call my cell or put URGENT in the subject header. Thank you for your patience.

From: [Shawn Biggings](#)
To: [Sean Krausert](#); [Planning](#); [Harry Shnider](#); [Nathan Grivell](#); [Joanna McCallum](#); [Karen Marra](#); [Shared.MunicipalClerk](#); [Tanya Foubert](#); [Jeffrey Hilstad](#); [Wade Graham](#); [Jeff Mah](#)
Subject: Re: Employee Housing/ Dwelling uses above industrial uses
Date: September 2, 2024 3:16:44 PM
Attachments: [IND 1 VS IND 2 USES.docx](#)

You don't often get email from [REDACTED]. [Learn why this is important](#)

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On Mon, Sep 2, 2024 at 2:43 PM Shawn Biggings [REDACTED] wrote:

Hello Mayor, council and planners,

We are long term residents and own Businesses in Canmore, Commercial Real Estate Services and Teepetown Textures. We feel strongly that the Employee Housing use remain in the LUB as a Discretionary Use in all industrial areas in Canmore., and concur with the BOWDA submission

Employee retention has been a major issue for most businesses in the Bow Valley for many years. There is a severe shortage of housing and even less affordable options. The elimination of the designation will surely result in many displaced employees and in turn businesses in the industrial area will lose staff. Most industrial uses are very compatible with housing on the second floor.

We support the preservation of industrial uses as they are essential to a viable community, but firmly believe that many industrial activities and employee housing can coexist in one building. Most permitted and discretionary uses are compatible with office and dwelling use.

BOWDA has noted that there does not seem to be clear criteria for determining why residential uses are appropriate in some industrial districts and not others. When examining the nature of the TID district and the SB district it becomes apparent that they are very close in nature to the IND 1 and Ind2 areas.

Within this same area, there also seems to be a lack of alignment of how land use districts are designated on the ground. There is no clear distinction between IND1 and IND2 except for two uses, as noted in the attached comparison. Before eliminating employee housing or dwelling units, a review of uses in out five

industrial areas may be helpful.

We support BOWDA's recommendation that the policy amendments are not applied specifically on a geography basis, but that they pertain to how land use designations are applied on the ground. Geographic specific recommendations would require further amendment of land use changes, in alignment with what BOWDA requests be completed.

BOWDA is concerned that with the land use district changes, existing employee housing and residential uses will no longer be considered an approved and conforming use under the MGA. With the elimination of the Employee Housing use from the district and the addition of rules that may not apply to previously approved developments, certain developments may no longer be rebuilt under the new rules of the Bylaw. As a result, destruction of more than 80% of any building that contains that use would mean that the use would not be allowed to be rebuilt as it was constructed. In the case of fire or other issue where the building experienced damage, there would be a loss of housing within the community and economic implications to the building owner. We would request that Council add a use to the district called "Uses approved prior to date" (similar to other districts in the Land Use Bylaw) as a Discretionary Use. This would rectify concerns with approved non-conforming buildings.

If Dwelling Units are allowed on the second storey, it is reasonable that the residential use does not exceed the floor area of the primary use . It is unrealistic to permit only 30% of the floor area . It is also reasonable to tie a permitted upper dwelling unit to the permitted use below, rather than permitting separate ownership, to avoid future conflict of uses.

Respectfully submitted for your consideration,

Shawn Biggings and Russ Bignold



IND 1 LIGHT INDUSTRIAL DISTRICT

The purpose of this district is to provide for a limited range of industrial uses which are located adjacent to arterial roads or residential areas and have a high standard of architectural appearance.

Non-industrial uses are appropriate only in the limited circumstances and locations where such uses do not displace industrial uses or utilize land or buildings with potential for light industrial development.

5.2.1 Permitted Uses

Accessory Building
Arts and Craft Studio [2020-16]
Brewery/Distillery
Contractor Service and Repair
Industrial Operation* (IND 1 only)
Laboratory
Laundry Facility, Industrial
Light Manufacturing
Open Space----(*discretionary in ind2*)
Public Building

5.2.2 Discretionary Uses

Administrative/Sales Office
Agriculture, Intensive
Athletic and Recreation Facility, Indoor
Automotive and Equipment Repair
Automotive Sales and Rentals
Car Wash
Eating and Drinking Establishment
Educational Institution
Employee Housing (above the ground floor)
Industrial Sale and Rental
Kennel
Logging Operation
Lumber Yard-(*permitted in ind2*)
Office (above ground floor GFA up to 250m2)
Outdoor Storage
Pet Care Facility
Printing Establishment
Recycling Depot
Retail Sales
Storage Facility
Transportation Terminal
Trucking Establishment
Warehouse-(*permitted in 2*)
Wholesale Sales* IND 1 only*

IND 2 GENERAL INDUSTRIAL DISTRICT

The purpose of this District is to provide for a range of industrial uses which allow for intensive & efficient use of Canmore's industrial land base in accordance with policies in the Municipal Development Plan.

Non-industrial uses are appropriate only in the limited circumstances & locations where such uses do not displace current industrial uses or utilize land or buildings with potential for general industrial development.

5.3.1 Permitted Uses

Accessory Building
Arts and Craft Studio [2020-16]
Brewery/Distillery
Contractor Service and Repair
Laboratory
Laundry Facility, Industrial
Light Manufacturing
Lumber Yard --(*discretionary in ind1*)
Public Building
Warehouse -(*discretionary in ind1*)

5.3.2 Discretionary Uses

Administrative/Sales Office
Agriculture, Intensive
Athletic and Recreational Facility, Indoor
Automotive and Equipment Repair
Automotive Sales and Rentals
Bulk Fuel Station* IND 2 only
Car Wash
Crematorium* IND2 only
Eating and Drinking Establishment
Educational Institution
Employee Housing
Industrial Sales and Rentals
Kennel
Logging Operation
Office (above ground floor)
Open Space--(*Permitted in 1*)
Outdoor Storage
Pet Care Facility
Printing Establishment
Recycling Depot
Retail Sales
Storage Facility
Transportation Terminal
Trucking Establishment

5.3.4 Restrictions on Non-Industrial Uses and Developments 5.3.4.1 In order to ensure that this District meets its purpose as a general industrial area, non-industrial uses will only be approved where such uses do not displace current industrial uses nor utilize land or buildings with potential development for general industrial purposes.

5.3.5.4 An Office development shall only be located above the ground floor of a building and shall be located east of Elk Run Boulevard only.

DEFINITIONS OF PERMITTED AND DISCRETIONARY USES IN IND 2

Accessory Building means a building which is subordinate or incidental to the principal building on a site that is not a Dwelling Unit. It must be located on the same site as the principal use and shall not precede the development of the principal building.

Arts and Crafts Studio means development used for the purpose of small scale, on-site, production of goods by hand manufacturing primarily involving the use of hand tools. Typical uses include pottery, ceramic, jewelry, toy manufacturing, and sculpture and artist studios.

Administrative/Sales Office means a temporary use which is incidental to the subdivision or development of a parcel of land which has received or is under consideration of subdivision, land use or development permit approval.

Agriculture, Intensive means a place that employs a concentrated method used to raise crops or to rear or keep livestock, or their products for market, including such operations as horse riding stables, poultry farms, pastures, rabbitries, fur farms, greenhouses, animal sanctuaries, tree farms, sod farms, nurseries and similar specialty uses conducted as the principal use of a building or site.

Athletic and Recreational Facility, Indoor means a facility for the purpose of indoor active recreation or athletic activities where patrons are predominantly participants, and any spectators are incidental. This includes but is not limited to gyms, athletic studios, skating and hockey rinks, swimming pools, rifle, archery and pistol ranges, bowling alleys and racquet courts.

Automotive and Equipment Repair means a facility for the servicing and/or repair of motor vehicles, motorcycles, snowmobiles, or similar vehicles and includes the sale, installation and servicing of related accessories and parts. [2020-16]

Automotive Sales and Rentals means a facility for the retail sale or rental of new or used automobiles and recreational vehicles together with incidental maintenance services and sale of parts. This includes automobile dealerships and car rental agencies.

Bulk Fuel Station means a facility for the purpose of storing fuel for distribution to customers and does not include a service station.

Brewery/Distillery means a facility licensed by the Alberta Gaming and Liquor Commission where beer, spirits and other alcoholic beverages are manufactured and may include the retail sale of products made on the premises for consumption off the premises. A Brewery/Distillery may include an area where products made on the premises are sold or provided to the public for consumption on the premises but are not considered an Eating and Drinking Establishment.

Car Wash means a facility for the washing, cleaning, or polishing of motor vehicles.

Contractor Service and Repair means a facility for the provision of contractor services primarily to individual households and the accessory sale of goods normally associated with such contractor services where all materials are kept within an enclosed building, and where there are no associated primary manufacturing activities.

Crematorium means an establishment with one or more cremation chambers used for the reduction of the human body by heat.

Eating and Drinking Establishment means a facility where food is prepared and served on the premises for sale to the general public and includes restaurants, delicatessens, and cafeterias but excludes Drive-in/Drive-through Food Services. This facility may be licensed by the Alberta Gaming and Liquor Commission such that alcoholic beverages may be served to the general public for consumption on the premises

Educational Institution means a place of instruction operated with public or private funds. Can be a private, public, separate, commercial, or post secondary school.

Employee Housing means one or more Dwelling Units used exclusively for the residence of employees and members of their family. **Employee** means a person who is primarily employed by an employer within the municipal boundaries of the Town of Canmore. For the purpose of this definition, a person is primarily employed if that person is performing, or is reasonably expected to perform, the services of an employee for an employer, for a minimum of an average of twenty (20) hours per week. The employee shall not be the same person as the employer. This provision may be varied at the discretion of the Development Authority where a proposed development meets the purpose of the applicable land use district and/or meets the intent of the Town's employee housing policies (e.g., in a building designed for a Live/Work Studio where a person is self-employed and living adjacent to their place of employment). In addition to the above, those individuals who can provide written proof (through such means as lease or rental agreements) of continuous residency within the Town of Canmore for a minimum of twenty-four (24) continuous months and who are primarily employed by an employer within the boundaries of the M.D. of Bighorn west of and including the hamlet of Seebe, or within the Town of Banff or Banff National Park, shall be considered an "employee" for the purposes of this Bylaw and shall be eligible to occupy a unit in an approved employee housing project.

Industrial Operation means a business engaged in secondary manufacturing, processing, assembling, disassembling, packaging, cleaning, servicing, testing, storing and distribution of materials, goods, products, or equipment.

Industrial Sales and Rental means a facility for the sale or rental of equipment typically used in building, roadway, pipeline, oilfield and mining construction or agricultural production. This includes development used for the sale or rental of new or used heavy trucks, motorhomes, and manufactured homes, together with incidental maintenance services and the sale of parts and accessories. Typical uses include heavy truck dealerships, recreation vehicle sales and manufactured home dealerships.

Kennel means a facility where dogs or cats or other domestic pets may be maintained, boarded, bred, trained, or cared for or kept for the purposes of sale but excludes a Veterinary Clinic

Laboratory means a facility for the purpose of scientific or technical research, investigations or experimentation

Laundry Facility, Industrial means a non-retail laundry facility serving business establishments, usually on a contract basis.

Light Manufacturing means a business engaged in secondary manufacturing which involves no Outdoor Storage, and which causes no environmental disturbances such as the creation of smoke, noise, dust or odors. [2020-16]

Logging or Logging Operation means the cutting of trees where the total area subject to cutting is greater than 500 m² or where the merchantable timber being cut on the parcel contains over 25 m³ of gross wood volume.

Lumber Yard means a facility where bulk supplies of lumber and other building materials are stored, offered, or kept for retail sale and includes storage on or about the premises of such material but does not include retail sales of furniture, appliances or other goods not ordinarily used in building construction.

Office means a facility primarily for the provision of professional, management, administrative or consulting services.

Open Space means land designated or reserved for active or passive recreational use by the general public, or to be left in a natural state, and includes all natural and man-made landscaping, facilities, playing fields, gardens, buildings and other structures that are consistent with the general purpose of parks and open space. Uses may include tot lots, picnic grounds, pedestrian pathways and trails, landscaped buffers, and playgrounds.

Outdoor Storage means the storing, stockpiling, or accumulating of goods, equipment or material in an area that is open or exposed to the natural elements, and includes vehicles, automobiles, recreational vehicles and boats, waste materials, debris, or garbage

Pet Care Facility means a facility for the cleaning, grooming and care of domestic pets where no overnight kenneling or keeping of any animals occurs.

Printing Establishment means a retail business providing photocopying and/or commercial offset printing and retail services, or a facility providing non-retail commercial, industrial printing and publishing services normally using automated, web-type presses or full colour process printing.

Public Building means a facility owned or operated by or for the Municipality, the Provincial Government, the Federal Government, or a corporation which is an agent of the Crown under federal or provincial statute for the purpose of furnishing services or commodities to or for the use of the inhabitants of the municipality

Recycling Depot means an indoor facility for the buying and/or temporary storage of household items for reuse where all storage is contained within an enclosed building.

Retail Sales means the use of a building in which the primary function is for the sale of finished goods or products to customers, and also includes rental services.

Storage Facility means a building or group of buildings used for internal storage of materials and goods that are not considered hazardous or toxic.

Transportation Terminal means a facility utilizing a building, structure, land, or any or all of them for the processing and loading and unloading of passengers and baggage to and from buses, vans, trains, or similar conveyances available for use by the general public.

Trucking establishment means a facility for the purpose of storing and dispatching trucks and tractor trailers for transporting goods.

Warehouse means a building for the storage of materials or commercial goods.

Wholesale Sales means a facility for the wholesale or retail sale of a limited range of bulky goods.

Sept 03,2024

Public Hearing Submission

Bylaw 2024-07 & Bylaw 2024-08

In Opposition

Bylaw 2024-08:

I will break down my comments per Land Use district.

Transitional Industrial District (TID):

Amendments 4- 7

- “Employee Housing” (above ground) should remain in place throughout the TID District.
- Defining residential uses as “Dwelling Units” places any future units in this area in the “open market”, which means that they can, and will likely be, sold as second homes. Section 5.1.5.1 (a.) in the current bylaw requires that units demonstrate that “Adequate long-term and legally-binding provisions are in place to ensure the dwelling units remain as bona fide Employee Housing’. With this removed future “Dwelling Units” in this area will be utilized the same a dwelling unit in any other land use district and placed on the open market, with no consideration for the benefits to the business community or the community at large that “Employee Housing” currently does.
- Section 5.1.5.1 in the proposed bylaw limits the unit size to a very modest level. While the intent is that limiting unit size will result in a more “affordable” price, that is not always the case as we have witnessed in the past. ie: Grotto Mountain and Riverstone.
- It is only by restricting the use of the units to “Employee Housing”, that we can have a degree of certainty the there will be business and community net benefit.

Light Industrial District (IND1) & General Industrial District 2 (IND2)

- In most cases my comments apply to both land use districts. However, there was historically a difference in the Industrial areas, which, in the context of these amendments seems to have some relevance.
 - When the Elk Run Industrial Park was created the lands on Boulder Crescent (ie. Bremner Engineering , Waste Transfer Station) were envisioned to be “heavy industrial”. More intensive industrial uses would be in this district, thus the businesses that we see located there today, for the most part. I would suggest that “Employee Housing” in this area was never appropriate and should not have been considered even as a “Discretionary Use”.

- The industrial lots on Elk Run Boulevard were considered unique because of their high visibility and required a higher degree of architecture and some restrictions on the types of industrial uses. The lots facing Elk Run Boulevard are ideally situated for “Employee Housing” and it would be appropriate to leave it as a “Discretionary Use”.
- The lots on Bow Meadows Crescent were also considered light industrial and developments had to take into account being adjacent to “Indian Flats” and could not have uses (smells, noise etc) that could disturb wildlife in the environmentally sensitive area. Bow Meadows Crescent, because of the type of development and use, is well situated to accommodate “Employee Housing” as a “Discretionary Use”.
- It would be my recommendation that IND2 be re-established on the industrial lands fronting Boulder Crescent and Glacier Drive and that “Employee Housing” be removed as a Discretionary Use. The other current uses could remain.
- I would suggest that the current IND1 and IND2 (Bow Meadows Crescent) be amalgamated into a new IND1 district, with consideration for the visibility of the IND1 area and the environmentally sensitive nature of the east portion of Bow Meadows Crescent. I would recommend that “Employee Housing” be included as a “Discretionary Use” in the new district.
- I would also recommend that 5.4.6.1 (Employee Housing) be incorporated into the Employee Housing sections of the Industrial areas as this makes the intent of employee housing clear.

Southern Business District SB

- I would recommend that “Employee Housing” remain as a Discretionary Use in the SB district.
- Defining residential uses as “Dwelling Units” places any future units in this area in the “open market”, which means that they can, and will likely be, sold as second homes. “Dwelling Units” in this area will be utilized the same a dwelling unit in any other land use district and placed on the open market, with no consideration for the benefits to the business community or the community at large that “Employee Housing” currently considers.
- Section 5.1.5.1 (a.) requires that units demonstrate that “Adequate long-term and legally-binding provisions are in place to ensure the dwelling units remain as bona fide Employee Housing”. This section should be added to the “Employee Housing Provisions” (5.4.6) of the current bylaw.
- Section 5.1.5.1 in the proposed bylaw limits the unit size to a very modest level. While the intent is that limiting unit size will result in a more “affordable” price that is

not always the case, as we have witnessed in the past. Ie: Grotto Mountain and Riverstone.

- It is only by restricting the use of the units to “Employee Housing”, that we can have a degree of certainty there will be business and community net benefit.

In Opposition

Bylaw 2024-07

- I am in opposition to any amendments to the MDP that would bring into question “Employee Housing” as being a potential use in Industrial Districts.
- In fact, if MDP amendments were to come forward they should encourage innovative ways for business owners, in industrial districts, to provide employee housing.
- I am totally opposed to granting TSMV an exemption to the LUB and MDP amendments being proposed. I recognize that TSMV would threaten the Town with legal action (once again) if they felt the Town was trying to dictate land use to them, however, if it makes sense for TSMV to have an exemption, then it makes no sense to impose these changes on our current landowners.

If we are in a housing crisis then we need to consider every option available to increase our supply of affordable housing. There is no magic bullet here. No one solution is going to rectify our housing situation, however, there needs to be a continuum of housing solutions available to the community. The Federal, Provincial and Municipal governments all have a role to play but the private sector can be reactive, flexible and innovative. These amendments do nothing but inhibit the industrial sector from participating in any meaningful solutions.

If there is any one threat to the health of industrial growth in Canmore it is labour and, as we are more than aware, housing is the deciding factor in attracting long-term, permanent employees. As it stands, an increasing number of employees are travelling to Canmore daily. It seems inappropriate for us, as a community, to pass our housing shortfalls off on to other communities which are themselves facing housing crises of their own. Especially when we have not exhausted every opportunity to deal with our own employees. We need to also consider the environmental impacts of moving large numbers of our employees to and from Canmore.

I am sure the amendments to the LUB and MDP were well intentioned, but I can't help but feel they are pushing us backwards, away from a viable and achievable solution to at least a portion of our housing crisis.

Thank you for your consideration,

Ron Casey



September 2, 2024

Mayor Sean Krausert and Members of Council,

RE: BOWDA Position & Recommendations Bylaws 2024-07 & 2024-08

Thank you for the opportunity for Basecamp Resorts to share feedback on proposed bylaws 2024-07 and 2024-08.

One of Basecamp's most challenging business matters is to ensure it can provide appropriate ***Housing affordability to house and retain employees.*** This is not a unique challenge to Basecamp as we often hear from other business owners, trades and contractors of their challenges to attract and retain talent in the Bow Valley. As such we encourage council to support initiatives which specifically designed to allow affordable housing alternatives.

We would also like to point out that for a number of years we have successfully accommodated our head office, staff housing, laundry facilities and workshop within our building in Moose Meadows. We are proud of our existing staff accommodation and would encourage touring them if you have not already. In our opinion this is an excellent example of a building which supports findings within the 'Light Industrial and Commercial Land Review Report' (April 2023), while also supporting the provision for desperately needed employee housing within the Bow Valley. Despite having this property, we, like business owners, continue to require additional housing opportunities.

Basecamp remains consistent in its support of housing on the second floor of industrial uses and we are pleased to see that Administration is recommending residential uses. Our only suggestion is to not distinguish and restrict housing uses between industrial districts as they are very close in nature and the Alberta Building Code provides the appropriate guidance to regulate when housing is to be restricted.

Basecamp also agrees with BOWDA's concern that with the land use district changes means that existing employee housing and residential uses will no longer be considered an approved and conforming use under the MGA. With the elimination of the Employee Housing use from the district and the addition of rules that may not apply to previously approved developments, certain development may no longer be rebuilt under the new rules of the Bylaw. As a result, destruction of more than 80% of any building that contains that use would mean that the use would not be allowed to be rebuilt as it was constructed. In the case of fire or other issue where the building experienced damage, there would be a loss of housing within the community and economic implications to the building owner. We would request that Council add a use to the district called "Uses approved prior to date" (similar to other districts in the Land Use Bylaw) as a Discretionary Use. This would rectify the concern with approved non-conforming buildings.

With regards to specific Land Use District comments we have two:

- 1) dBA Noise/ Sound the Town of Canmore will not be able to regulate dBA Noise / Sound that is emitted and opens itself to future conflict. Noise is a regulate item under the Alberta Building Code (ABC). Noise levels within the structure of buildings are identified within the ABC. The Town trying to further control neighbours noise levels is not practical or feasible and the proposed 35-40 dBA range is unrealistic. We strongly suggest that the Land Use District regulations pertaining to sound and noise be removed from the list of amendments as it is already governed under the ABC.

- 2) If Dwelling Units are allowed on the second storey, we would recommend that the residential use does not exceed the floor area of the primary (industrial) use. This is a practical issue, if only 30% of floor area of the first floor could be built as residential it would add considerable cost to the building making it unfeasible. This regulation as written would effectively ensure that residential uses are not built. Allowing Dwelling Units to occupy the second storey provided it is equal to or less than the GFA of the primary uses allows flexibility while keeping in line with the intent of the district.

Sincerely,

Birol Fisekci

President of Real Estate
Basecamp Resorts

From: [REDACTED]
Subject: FW: Housing in Industrial Areas
Date: September 9, 2024 10:20:37 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

On Aug 25, 2024, at 5:21 PM, Peter Graul <[REDACTED]> wrote:

Some peop [REDACTED] often get
email from [REDACTED]. [Learn why
this is important](#)

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Hello Council,

I very much vouch to allow housing in industrial areas. We have a tremendous housing shortage and, in my opinion, there is now reason to not allow it. Of course, it will require bylaws and regulations to stay on top and pressure will have to be put on landlords so that those areas are not getting out of control.

Living quarters, apartments, housing has always been part of industrial buildings all over Germany (and likely many other European countries I cannot speak for) and is natural.

Best regards,
Peter Graul



P: [REDACTED]

Mailing address: [REDACTED]
[REDACTED]

www.europeantimberframing.com

www.enerficientwalls.ca

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From: president@bowvalleychamber.com
To: Council; [Shared.MunicipalClerk](#)
Cc: [REDACTED]
[REDACTED] Employee Housing above Industrial - Bow Valley Chamber of Commerce
Date: August 30, 2024 12:54:53 PM

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Town Council,

I hope this message finds you well. On behalf of the Bow Valley Chamber of Commerce, I would like to share our perspective on the ongoing challenges and opportunities related to employee housing in the Bow Valley. This issue is of significant importance to our members, and we appreciate the Town of Canmore's efforts to address it especially as it relates to the topic of Employee Housing about Industrial Use.

We know that housing in the Bow Valley is a complex issue requiring unique solutions and innovative ideas to ensure affordable housing options for employees, residents, and tourists. As the region continues to grow and attract both seasonal and long-term visitors, it is crucial to address the diverse needs of our community with sustainable and inclusive strategies. The Bow Valley Chamber of Commerce is committed to collaborating with local businesses, government, and stakeholders to develop and implement effective housing solutions that will support the economic vitality and quality of life for all who live, work, and visit our beautiful region.

Our members consistently highlight employee housing as one of the most pressing concerns for businesses in our community. The lack of affordable and accessible housing options directly impacts the ability to attract and retain talent, which in turn affects the overall economic health of our region. Many businesses, particularly in the hospitality and retail sectors, struggle to fill positions due to the housing shortage, which hampers their ability to operate at full capacity.

The Chamber has gathered feedback from our members, and several key themes have emerged:

1. **Affordable Housing Solutions:** There is a strong demand for housing solutions that cater to the needs of low to moderate-income earners, particularly those in service-oriented jobs. This includes not only rental units but also affordable ownership options that allow employees to establish roots in the community.
2. **Proximity to Work:** Employees benefit significantly from housing that is within close proximity to their place of work. Reducing commuting times not only enhances work-life balance but also alleviates traffic congestion and contributes to environmental sustainability.

3. **Diverse Housing Options:** Our members emphasize the need for a variety of housing types, including family-sized units, shared accommodations, and smaller, single-occupancy units. A diverse housing mix would better meet the needs of the workforce and reflect the varied demographics of our community.

4. **Collaborative Efforts:** We believe that solving the housing challenge requires continued collaboration between the Town of Canmore, local businesses, non-profit organizations, and other stakeholders. Public-private partnerships and innovative housing models, such as co-operative housing or employer-sponsored housing, could play a significant role in expanding the availability of affordable units.

The Bow Valley Chamber of Commerce is committed to working alongside the Town of Canmore to find viable solutions to this issue. We are eager to engage in further discussions and explore opportunities for collaboration that will benefit both our local businesses and the broader community.

Thank you for your attention to this matter. We look forward to your continued leadership in addressing the housing needs of the Town of Canmore.

With thanks,

Gavin Harmacy
President
Bow Valley Chamber of Commerce



Housing above industrial in the Bow Valley

I am writing to underscore the critical importance of offering staff accommodations as part of an employment package, particularly in the Bow Valley area, and the potential to utilize 2nd floor space, above industrial premises as a partial solution to the issue.

The high cost of living, combined with a tight rental market, makes it increasingly difficult for employees to find suitable accommodations. This challenge is not just a personal burden on our employees; it also impacts our ability to attract and retain talent. Many potential employees are deterred by the prospect of an extensive and often fruitless search for housing, while existing employees face the ongoing stress of securing stable living arrangements.

By offering staff accommodations, we can provide our employees with a sense of security and stability, which in turn enhances job satisfaction and loyalty.

From a property owner's perspective, converting or building accommodation above safe industrial premises offers several advantages, particularly in addressing the challenges of leasing second-floor spaces and contributing to the broader community by helping alleviate the current housing shortage.

Second-floor spaces in industrial properties often present leasing challenges. They are typically less attractive to businesses that prioritize ground-floor access for logistical reasons. As a result, these spaces can remain underutilized, generating less income than the more desirable main-floor spaces. By converting these second-floor areas into residential units, property owners can turn a less leasable asset into a profitable one.

This conversion not only maximizes the revenue potential of the property but also serves a critical societal need. The housing shortage in many areas has become a pressing issue, impacting both living standards and the local economy. Increasing the supply of housing helps stabilize rental prices, supports the local workforce, and enhances the overall economic vitality of the area.

Sincerely,
Derek Johnson

Bow Valley Business and Property Owner

From: [shane_jonker](#)
To: [Council](#); [Shared.MunicipalClerk](#)
Subject: Industrial Zones public hearing
Date: September 2, 2024 12:05:02 PM

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Good morning Council,

It is important that Canmore preserve its ability to be industrious into the future and that we retain suitably zoned lands for that purpose. This is consistent with consultant reports, administration assessment and so far, council direction. It is possible to do so while also making it possible to include dwelling units in industrial zoning by addressing the following:

- Canmore's LUB makes reference to 'Light Industrial' many times but contains no definition of same. There should also be an improvement to the current definition of 'Light Manufacturing'

- The building code states: 3.1.3.2. *Prohibition of Occupancy Combinations*

- 1) *No major occupancy of Group F, Division 1 shall be contained within a building with any occupancy classified as Group A, B or C.*

- 2) *Not more than one suite of residential occupancy shall be contained within a building classified as a Group F, Division 2 major occupancy.*

- Dwelling units are a Group C use. The Group F Division 1 & 2 uses are below followed by LUB uses where I have highlighted incompatible uses currently permitted or discretionary. My feeling is that for planning purposes, which is what the Town and its LUB are meant to be doing, the first order of business would be to amend the LUB to create districts with uses that have building code occupancy compatible uses and prohibits uses that are not compatible in the areas that the community feels should be candidates for second floor dwelling units. This would allow for a process for the owners to accept or not accept the new limitations to the uses through the public process.

The list of uses that would be prohibited in districts that could accept second floor dwelling units would be the below list. If I was an owner in an affected district, or even an adjacent district I would be looking at this list very carefully. I have highlighted the uses list for the 3 industrial zones where prohibition or further prescription would be required to be compatible with Group A,B or C inclusion in the building. It's not just the unit owner, it's the building and district that would need to adopt the restrictions. 5.1.5.1 (at the end of the email) and the corresponding sections for Ind 1 and 2 are simply not legal within this bylaw and I would suggest that non compliance with the building code may have already occurred. To be done properly I would suggest that the districts list prohibited uses from the code because of the ambiguity of words like 'light manufacturing'. As an owner or buyer I would have grave concerns about this restrictive district so I would suggest that while uses are removed, those in Groups A,B and C that are compatible should be added to create a well balanced district. I have added them in at the end to show how many great uses could be added to a district to offset the removal.

This would be a great first step towards meeting several community needs.

Sincerely

Shane Jonker

Group F, Division 1

Bulk plants for flammable liquids

Bulk storage warehouses for hazardous substances

Cereal mills

Chemical manufacturing or processing plants

Distilleries

Dry cleaning plants

Feed mills

Flour mills
Grain elevators
Lacquer factories
Mattress factories
Paint, varnish and pyroxylin product factories
Rubber processing plants
Spray painting operations
Waste paper processing plants
Group F, Division 2
Aircraft hangars
Box factories
Candy plants
Cold storage plants
Dry cleaning establishments not using flammable or explosive solvents or cleaners
Electrical substations
Factories
Freight depots
Helicopter landing areas on roofs
Laboratories
Laundries, except self-service
Mattress factories
Planing mills
Printing plants
Repair garages
Salesrooms
Service stations
Storage rooms
Television studios not admitting a viewing audience
Warehouses
Wholesale rooms
Woodworking factories
Workshops

5.1 TID TRANSITION INDUSTRIAL DISTRICT

Purpose

To provide for a range of Light Manufacturing and other light industrial uses. [2021-24]

5.1.1 Permitted Uses

Accessory Building

Automotive Sales and Rentals

Contractor Service and Repair

Printing Establishment

Public Building

Public Utility

Veterinary Clinic

5.1.2 Discretionary Uses

Administrative/Sales Office

Arts and Craft Studio [2020-16]

Athletic and Recreational Facility, Indoor

Athletic and Recreational Facility, Outdoor

Brewery/Distillery

Eating and Drinking Establishment

Educational Institution

Employee Housing (above the ground floor)

Light Manufacturing

Logging Operation

Lumber Yard

Office (above the ground floor)

Recycling Depot

Retail Sales

Wholesale Sales

IND 1 LIGHT INDUSTRIAL DISTRICT

5.2.1 Permitted Uses

Accessory Building

Arts and Craft Studio [2020-16]

Brewery/Distillery

Contractor Service and Repair

Industrial Operation

Laboratory

Laundry Facility, Industrial

Light Manufacturing

Open Space

Public Building

5.2.2 Discretionary Uses

Administrative/Sales Office

Agriculture, Intensive

Athletic and Recreation Facility, Indoor

Automotive and Equipment Repair

Automotive Sales and Rentals

Car Wash

Eating and Drinking Establishment

Educational Institution

Employee Housing (above the ground floor)

Industrial Sale and Rental

Kennel

Logging Operation

Lumber Yard

Office (above the ground floor with a GFA up to 250m²)

Outdoor Storage

Pet Care Facility

Printing Establishment

Recycling Depot

Retail Sales

Storage Facility

Transportation Terminal

Trucking Establishment

Warehouse

Wholesale Sales

5.3.1 Permitted Uses

Accessory Building

Arts and Craft Studio [2020-16]

Brewery/Distillery

Contractor Service and Repair

Laboratory

Laundry Facility, Industrial

Light Manufacturing

Lumber Yard

Public Building

Warehouse

5.3.2 Discretionary Uses

Administrative/Sales Office

Agriculture, Intensive

Athletic and Recreational Facility, Indoor

Automotive and Equipment Repair

Automotive Sales and Rentals

Bulk Fuel Station

Car Wash

Crematorium

Eating and Drinking Establishment

Educational Institution

Employee Housing

Industrial Sales and Rentals

Kennel

Logging Operation

Office (above the ground floor) [2022-24]

Open Space

Outdoor Storage

Pet Care Facility

Printing Establishment

Recycling Depot

Retail Sales

Storage Facility

Transportation Terminal

Trucking Establishment

5.1.5 Employee Housing Provisions

5.1.5.1 Employee Housing may be considered and approved in this District, only when located

above the ground floor of a building and when the following issues can be addressed to the satisfaction of the Development Authority:

- a. Adequate long-term and legally-binding provisions are in place to ensure the Dwelling Units remain as bona fide Employee Housing and are demonstrably subordinate in terms of area and intensity to other uses in the building;
- b. The space proposed for Employee Housing units would not be reasonably used for commercial or industrial purposes;
- c. The Employee Housing units are appropriate in design for Employee Housing, particularly with respect to the unit size;
- d. Employee Housing units would not constrain any future permitted or discretionary, commercial or industrial uses from developing on the site or on surrounding areas;
- e. Impacts of existing industrial development in the area, including the adjacent CP Rail line, would not unduly interfere with Employee Housing units; and
- f. Outdoor Amenity Space such as balconies can be provided as part of the Employee Housing while meeting all of the above-described requirements in regard to impacts to or from adjacent industrial uses.

Group A, Division 1

Motion picture theatres
Opera houses
Television studios admitting a viewing audience
Theatres, including experimental theatres

Group A, Division 2

Art galleries
Auditoria
Bowling alleys
Churches and similar places of worship
Clubs, non-residential
Community halls
Courtrooms
Dance halls
Daycare facilities
Exhibition halls (other than classified in Group E)
Gymnasia
Lecture halls
Libraries
Licensed beverage establishments
Museums
Passenger stations and depots
Recreational piers
Restaurants
Schools and colleges, non-residential
Undertaking premises

Group A, Division 3

Arenas
Indoor swimming pools, with or without spectator seating
Rinks

Group A, Division 4

Amusement park structures (not elsewhere classified)
Bleachers
Grandstands
Reviewing stands
Stadia

Group B, Division 1

Jails
Penitentiaries
Police stations with detention quarters
Prisons
Psychiatric hospitals with detention quarters
Reformatories with detention quarters

Group B, Division 2

Care facilities with treatment
Convalescent /recovery/rehabilitation centres with treatment
Hospices with treatment
Hospitals
Infirmaries
Nursing homes with treatment
Psychiatric hospitals without detention quarters
Respite centres with treatment

Group B, Division 3

Assisted/supportive living facilities
Care facilities without treatment
Children's custodial homes
Convalescent/recovery/rehabilitation centres without treatment
Group homes
Hospices without treatment
Nursing homes without treatment
Reformatories without detention quarters
Respite centres without treatment

Group C

Apartments
Boarding houses
Clubs, residential
Colleges, residential
Convents

Dormitories
Family day homes/group family child care homes
Hotels
Houses
Lodging houses
Monasteries
Motels
Schools, residential

Town of Canmore

Attn: Municipal Clerk

902-7 Avenue, Canmore AB T1W 3K1

Re: Public Hearing Submission AGAINST Bylaws 2024-07 Discouraging Employee Housing in Industrial Areas, and 2024-08 Removal of Employee Housing in Industrial Districts

Dear Mayor and members of council:

As this council has stated: we are in a housing crisis. This crisis impacts our entire community—residents and businesses alike. Therefore, Tourism Canmore Kananaskis (TCK) is AGAINST Bylaws 2024-07 Discouraging Employee Housing in Industrial Areas and 2024-08 Removal of Employee Housing in Industrial Districts. TCK is especially opposed to not allowing housing in industrial areas north of the Trans-Canada Highway as well as changing “Employee Housing” to “Dwelling Unit”.

Canmore’s businesses are struggling to hire and retain staff due to the lack of affordable housing. Many employers, like residents, are unable to afford the high rents and residential land costs in residential and commercial areas. As a result, they are looking at options within the industrial zoned lands of Canmore, often second story industrial space that is typically utilized as office space. While office space may be scarce (albeit not as scarce as housing), solutions such as technology and co-working spaces have allowed businesses to reduce office size and provide alternatives that meet their business needs.

By allowing discretionary or multi-use (i.e. Employee Housing and/or industrial use), market demand will allow for changes of use based on the needs of the community. If in the future, we are no longer in a housing crisis and the demand for second floor industrial space is greater than that for housing, these spaces might be converted back to industrial and commercial spaces. It should also be noted that Canmore will see additional commercial and industrial developments, mainly at Palliser and Smith Creek, become available in the years to come. While we cannot be certain what future needs are, we do know that right now, the businesses community of Canmore is in dire need of employee housing.

The housing crisis and resulting “workforce crisis”¹ are well documented in many town documents. However, in these reports – specifically in the “Canmore Retail Gap Analysis and

¹ <https://www.mycanmore.ca/30910/widgets/154289/documents/106267>, page xix

Light Industrial & Commercial Land Review” (CRGA), the Labour Market Recruitment and Retention Strategy (LRRS) and the Economic Development Strategy (EDS)-housing has been out of scope. Albeit all these studies reference the housing crisis throughout. For example, a quick search shows housing is referenced 264 times in the 184-page CRGA document, 174 times in the 115-page LRRS document and 21 times in the 32-page EDS document. This showcases how closely the housing crisis is tied to a flourishing economy.

While council’s strategic goals clearly mention “a commitment to underserved housing options²” they do not include a focus on a diversified economy or vibrant businesses. However, it does mention “Inter-governmental, business, and not-for-profit relationships result in mutually beneficial outcomes³” The proposed bylaw amendments appear to disregard this goal and considering the number of businesses and business organizations opposed to the proposed amendments, the lack of consultation with these stakeholders is concerning.

Arguments against employee housing above industrial areas overlook the fact that businesses will not be attracted to these lands if the housing crisis persists. While Tourism Canmore Kananaskis commends this council’s work, these long-term projects do not address the immediate business needs.

Concerns about living standards in Canmore’s Industrial Lands point to the precarious housing situation employee housing creates. We would like to point out that the Town of Canmore created a safe parking program to allow homeless employees some form of safe shelter. We don’t think that anyone argues that the safe park program offers dignified housing. However, it is a small part to making living in Canmore for new residents attainable until they are able to secure long-term housing. We would argue that employee housing, even if in industrial areas, would be preferable to the safe park program.

TCK strongly encourages council to keep the current language of employee housing in the Land Use Bylaw and not to replace it with “Dwelling Unit”. We understand that enforcement can be challenging, but successful enforcement of non-conforming uses in the past provides confidence for any future enforcement. Keeping the words “Employee Housing” in the LUB will also show potential developers the intentions for this land, regardless of enforceability.

TCK is concerned that if the broader word ‘dwelling unit’ is used in the land use bylaw, industrial land prices will go up, exaggerating issues on both the employee housing and industrial land affordability.

² [233395 \(canmore.ca\)](https://www.canmore.ca), page 4

³ [233395 \(canmore.ca\)](https://www.canmore.ca), page 6

Tourism Canmore Kananaskis
268 – 105 Bow Meadows Crescent
Canmore, AB T1W 2W8

P: 855.678.1295
E: info@explorecanmore.ca
W: ExploreCanmore.ca

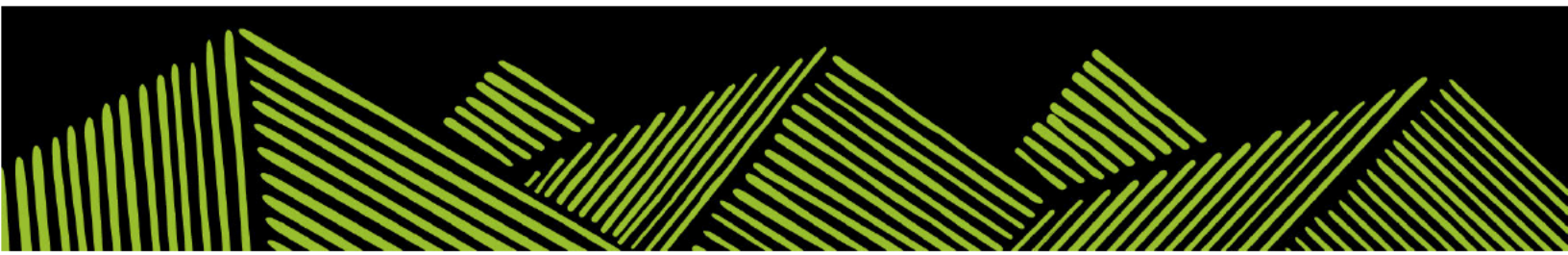


TCK recognizes the difficulty of this decision, however, we encourage you to follow your strategic direction and listen to your business owners that urge you to vote against the two bylaws as presented today.

Best regards,

A handwritten signature in blue ink, appearing to read "Rachel Adams". The signature is fluid and cursive.

Rachel



[Redacted]

[Redacted]

On Aug 30, 2024, at 5:00 PM, Bruce McKenzie [Redacted] wrote:

Some people who received this message don't often get email [Redacted].
[Learn why this is important](#)

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Pretty simple to turn this down. What are you doing about the rest of the housing issues in Canmore!? Get moving.

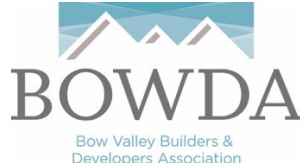
Bruce McKenzie, Architect, AAA, SAA, AIBC, FRAIC
Strategic Advisor, Residential

[Redacted]

norr.com

[Redacted]

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August 29, 2024

Mayor Sean Krausert and Members of Council,

RE: BOWDA Position & Recommendations Bylaws 2024-07 & 2024-08

On behalf of our 274 member businesses and over 1000 employees that live and work within the Bow Valley real estate development industry either as builders and developers, or in a supporting capacity, BOWDA would like to share feedback on proposed bylaws 2024-07 and 2024-08.

Housing affordability and the ability to house and retain employees is one of the highest priority issues for BOWDA members and affected landowners, specifically for those operating as a trade or contractor as well as those business owners in the Elk Run Industrial Area. These housing units would be private ventures, not supported by or requiring tax dollars and could expand the supply of much needed employee housing.

BOWDA and the affected landowners have not been adequately consulted on this Bylaw or its implications. BOWDA recommends that with engagement, a solution that aligns to Council's objectives while addressing concerns of the community and landowners, can be arrived at in an expeditious manner.

The Indian Flats ASP clarifies that the intent of bow meadows was always clean, light industrial. Light industrial is compatible with residential and can be adjacent to it as per the Alberta Building Code.

We would also like to acknowledge that we have reviewed the 'Retail Gap Analysis and Light Industrial and Commercial Land Review Report (April 2023) and do support preservation of industrial activities and uses to ensure a more diversified economy, to expand the non-residential tax base and to provide opportunities for new or expanded companies to choose Canmore as a place of business. However, we believe both this and the provision of employee housing can be achieved.

Land Use Alignment

BOWDA remains consistent in its support of housing on the second floor of industrial uses, specifically within the east portion of the Elk Run Industrial Area. BOWDA is happy to see that Administration is recommending residential uses within the TID and SB districts. BOWDA further observes that there does not seem to be clear criteria for determining why residential uses are appropriate in some industrial districts and not others. When examining the nature of the TID district and the SB district it becomes



apparent that they are very close in nature to the area identified as the east Bow Meadows area (See map).

Within this same area, there also seems to be a lack of alignment of how land use districts are designated on the ground. There is no clear distinction between IND1 and IND2 and it seems that, with time, two distinct types of areas have emerged that do not necessarily match the land use districts. We would recommend that the East Bow Meadows area is examined for inclusion of residential (Dwelling Unit) similar to what is proposed in the TID or SB districts.

This can be done in any number of ways:

- 1. realignment of IND1 and IND2 land use districts and the inclusion of the residential use (Dwelling Unit) for the area; or
- 2. redesignation of just the area to TID or SB as appropriate; or
- 3. the creation of a new district.



Two distinct industrial areas exist in Bow Meadows but the land use districts do not align to the nature of these areas.

Policy Amendments

BOWDA recommends that the policy amendments are not applied specifically on a geography basis, but that they pertain to how land use designations are applied on the ground. Geographic specific recommendations would require further amendment of land use changes, in alignment with what BOWDA requests be completed.



Concern with Approved Non-Conforming Uses

BOWDA is concerned that with the land use district changes, existing employee housing and residential uses will no longer be considered an approved and conforming use under the MGA. With the elimination of the Employee Housing use from the district and the addition of rules that may not apply to previously approved developments, certain development that may no longer be rebuilt under the new rules of the Bylaw. As a result, destruction of more than 80% of any building that contains that use would mean that the use would not be allowed to be rebuilt as it was constructed. In the case of fire or other issue where the building experienced damage, there would be a loss of housing within the community and economic implications to the building owner. We would request that Council add a use to the district called "Uses approved prior to date" (similar to other districts in the Land Use Bylaw) as a Discretionary Use. This would rectify our concern with approved non-conforming buildings.

Land Use District Comments

dBA Noise/ Sound

The Town of Canmore is unable to regulate items that are regulated under the Alberta Building Code (ABC). Noise levels within the structure of buildings are identified within the ABC and specifically which examine ratings based on adjacencies. Further, controlling neighbours noise levels is not practical or feasible and the proposed 35-40 dBA range is unrealistic, given that modern appliances run at 35-46dBA (source: Danby Canada). We would suggest that the Land Use District regulations pertaining to sound and noise be removed from the list of amendments as it is already governed under the ABC.

If Dwelling Units are allowed on the second storey, we would recommend that provided the residential use does not exceed the floor area of the primary use that a residential use be allowed to occur, ie. <50%. It would be uneconomic to permit residential uses on the second storey if only 30% of floor area of the first floor could be built. This regulation as written would effectively ensure that residential uses are not built. Allowing Dwelling Units to occupy the second storey provided it is less than the GFA of the primary uses allows flexibility while keeping in line with the intent of the district; should reflect a minimum percentage, not a maximum.

We look forward to presenting this in-person at the public hearing on September 3rd.

Sincerely,



Ian O'Donnell
Executive Director



Brian Talbot
Board Chair



Re: Land Use Bylaw Amendment Circulation letter dated Aug 6, 2024

August 26, 2024

Dear Mayor and Members of the Canmore City Council,

I hope this letter finds you well. As a concerned small business owner in Canmore, I am writing to express my deep apprehension regarding the recent discretionary land use change that removes employee housing as a permitted use on properties identified within the General Industrial District (IND-2). This decision has significant implications for our community, and I urge you to reconsider.

Before delving into the specifics, allow me to provide some context. Canmore, nestled in the stunning Bow Valley, is a vibrant town known for its natural beauty, outdoor recreation, and thriving tourism industry. However, like many desirable mountain towns, we face unique challenges, particularly when it comes to housing affordability.

One of the cornerstones of a healthy community is ensuring that those who work here can also afford to live here. Employee housing plays a crucial role in achieving this balance. It allows businesses to attract and retain skilled workers, fosters a sense of stability, and contributes to the overall well-being of our town.

Background:

As we discuss land use, it's essential to recognize our business, the Canmore Bottle Depot—a community asset that exemplifies responsible waste management. Over the past 30 years, the Canmore Bottle Depot has been supporting Canmore's sustainability goals by providing the community with beverage container recycling and deposit redemptions. Over the years, the Canmore bottle depot has received many accolades, mostly recently being the "Applaud a Depot" winner and featured on the Alberta Bottle Depot Association website: <https://www.abda.ca/>. The Depot is a family operated business and committed to helping those in need and through the covid closure provided the Cerebral Palsy Association in Alberta, Ramone Bravo (local initiative), SPCA and the local food bank with over \$42,000 in support through raised bottle donations/redemptions. The depot has partnered with a number of other local initiatives from High School Grads, the Scouts, hockey teams and countless other associations in support of the community in which it operates.

The Living Wage Challenge:

The pressing issue we face is that Canmore's living wage, currently at an impressive \$38.80 per hour, stands as the highest in Alberta. This seemingly positive statistic masks a critical issue: the lack of affordable housing. Our picturesque mountain setting attracts residents and visitors alike, but it also drives up real estate prices. As a result, employees, essential to our local economy, struggle to find suitable housing within their means.

The Role of Employee Housing:

Small business owners like myself rely on a dedicated workforce. Without employee housing options, we face a dilemma: either pay higher wages to compensate for housing costs or risk losing valuable staff. The latter scenario threatens the viability of our businesses. By allowing maximum land flexibility, we can create a win-win situation by:

1. **Attracting and Retaining Talent:** Employee housing ensures that workers can afford to live near their workplace. When employees feel secure in their housing situation, they are more likely to stay long-term, reducing turnover costs for businesses.
2. **Mitigating Wage Pressure:** Canmore's high living wage is partly driven by housing costs. By providing employee housing, we can alleviate this pressure, allowing businesses to compete on a level playing field with other jurisdictions in Alberta.
3. **Balancing Safety and Functionality:** retention of employee housing as a discretionary use, ensures community safety and functionality targets are met during the permitting process for new construction. We can strike a balance that meets both business needs and community well-being.

A Plea for Reconsideration:

In light of the above, I implore the City of Canmore to revisit its decision regarding employee housing. Let us not forget that our small businesses form the backbone of our community. We contribute to our unique character, provide employment opportunities, and enhance our quality of life. Removing employee housing as a discretionary use jeopardizes this delicate equilibrium.

I urge you to consider the long-term impact of this decision. Canmore thrives when its workforce thrives. Let us work together to find solutions that support both economic growth and social well-being.

Thank you for your attention to this matter. I trust that you will carefully weigh the implications and make a decision that reflects the best interests of our town.

Sincerely,

Faizel Poonja, Canmore Bottle Depot Inc., Poonja Holdings (2006) Inc.

████████████████████
████████████████



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

On Sep 3, 2024, at 6:49 AM, Brian [REDACTED] wrote:

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Hello Mayor, council and planners,

I am writing you about the above issue.

BOWDA has noted that there does not seem to be clear criteria for determining why residential uses are appropriate in some industrial districts and not others. When examining the nature of the TID district and the SB district it becomes apparent that they are very close in nature to the IND 1 and Ind2 areas.

Within this same area, there also seems to be a lack of alignment of how land use districts are designated on the ground. There is no clear distinction between IND1 and IND2 except for two uses, as noted in the attached comparison. Before eliminating employee housing or dwelling units, a review of uses in our five industrial areas may be helpful.

We support BOWDA's recommendation that the policy amendments are not applied specifically on a geography basis, but that they pertain to how land use designations are applied on the ground. Geographic specific recommendations would require further amendment of land use changes, in alignment with what BOWDA requests

be completed.

BOWDA is concerned that with the land use district changes, existing employee housing and residential uses will no longer be considered an approved and conforming use under the MGA. With the elimination of the Employee Housing use from the district and the addition of rules that may not apply to previously approved developments, certain developments may no longer be rebuilt under the new rules of the Bylaw. As a result, destruction of more than 80% of any building that contains that use would mean that the use would not be allowed to be rebuilt as it was constructed. In the case of fire or other issue where the building experienced damage, there would be a loss of housing within the community and economic implications to the building owner. We would request that Council add a use to the district called “Uses approved prior to date” (similar to other districts in the Land Use Bylaw) as a Discretionary Use. This would rectify concerns with approved non-conforming buildings.

If Dwelling Units are allowed on the second storey, it is reasonable that the residential use does not exceed the floor area of the primary use . It is unrealistic to permit only 30% of the floor area . It is also reasonable to tie a permitted upper dwelling unit to the permitted use below, rather than permitting separate ownership, to avoid future conflict of uses.

Best regards.

Brian Salzgeber – owner Canmore Woodcrafters



Brian Salzgeber
El Jefe | Red Seal Cabinetmaker



From: [Ernst](#)
To: [Shared.MunicipalClerk](#)
Subject: FW: Land use Bylaw Amendment
Date: September 2, 2024 4:38:00 PM

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[REDACTED]

[REDACTED]

From: Ernst
Sent: Monday, September 2, 2024 4:18 PM
To: municipal.clerk@canmore.ca
Subject: Land use Bylaw Amendment

Mayor Sean Krausert and Members of Council,

Regarding the proposed land use bylaw amendment, I am not in favor of the changes and would like to make the following point:

- I agree with the position that BOWDA has taken and support their points.
- Do understand that the town wants to keep as much industrial space available und not using it up for staff/employ housing.
- There exists a huge shortage of affordable housing as everybody knows way not use some of the existing second floor spaces for it.
- The town has approved some staff housing in a few buildings in district IND1 and did not allow it in buildings next to it in the same zoning, that is something that should never happened the town set a precedent by applying deferent rules to the same type of applications. Other businesses asking for the same treatment as the ones that got approval, and they get turned down.
- Having second floor spaces available for rent is great and you may get a new business starting up, but with the current salaries that are paid most staff can't afford to live here.
- I think the town of Canmore has an obligation that the existing businesses sexed and drive and are able retain the employees they need and that means for most businesses' employees need low cost/affordable housing.
- Would it be possible for the Mayor and council to have second look to see if there could be a solution fund that some housing could be allowed on the second floor in all zones TID,SB,IND1 and IND2?

I would like to thank the mayor and council for there time to look at some of my thoughts.

Ernst Salzgeber owner of the building on 102 Boulder Crescent

This email and any attachments thereto may contain private, confidential, and privileged material for the sole use of the

From: [Sara Salzgeber Jones](#)
To: [Shared.MunicipalClerk](#); [Sean Krausert](#); [Planning](#)
Subject: Employee Housing in Industrial Areas
Date: September 2, 2024 11:16:33 PM

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Dear Mayor, Council Members and Planners,

I am a long term resident of Canmore and feel strongly that the Employee Housing use remain in the LUB as a Discretionary Use in all industrial areas in Canmore and concur with the BOWDA submission.

Employee retention has been a major issue for most businesses in the Bow Valley for many years due to a severe shortage of housing and even less affordable options. The elimination of the designation will result in many displaced employees and in turn businesses will lose staff. Most industrial uses are very compatible with housing on the second floor.

I support the preservation of industrial uses as they are essential to a viable community, but strongly believe that many industrial activities and employee housing can coexist in one building. Most permitted and discretionary uses are compatible with office and dwelling use.

BOWDA has noted that there does not seem to be clear criteria for determining why residential uses are appropriate in some industrial districts and not others. When examining the nature of the TID district and the SB district it becomes apparent that they are very close in nature to the IND 1 and IND2 areas.

Within this same area there also seems to be a lack of alignment of how land use districts are designated on the ground. There is no clear distinction between IND1 and IND2 except for two uses, as noted in the attached comparison. Before eliminating employee housing or dwelling units, a review of uses in our five industrial areas may be helpful.

I support BOWDA's recommendation that the policy amendments are not applied specifically on a geography basis, but that they pertain to how land use designations are applied on the ground. Geographic specific recommendations would require further amendment of land use changes, in alignment with what BOWDA requests be completed.

BOWDA is concerned that with the land use district changes, existing employee housing and residential uses will no longer be considered an approved and conforming use under the MGA. With the elimination of the

Employee Housing use from the district and the addition of rules that may not apply to previously approved developments, certain developments may no longer be rebuilt under the new rules of the Bylaw. As a result, destruction of more than 80% of any building that contains that use would mean that the use would not be allowed to be rebuilt as it was constructed. In the case of fire or other issue where the building experienced damage, there would be a loss of housing within the community and economic implications to the building owner. We would request that Council add a use to the district called "Uses approved prior to date" (similar to other districts in the Land Use Bylaw) as a Discretionary Use. This would rectify concerns with approved non-conforming buildings.

If Dwelling Units are allowed on the second storey, it is reasonable that the residential use does not exceed the floor area of the primary use. It is unrealistic to permit only 30% of the floor area. It is also reasonable to tie a permitted upper dwelling unit to the permitted use below, rather than permitting separate ownership, to avoid future conflict of uses.

In summary, I am concerned and strongly oppose the proposed land use bylaw amendment. Lack staff and workers due to a shortage of affordable accommodation has been a chronic ongoing issue here. If the town actually wants to support and help existing and new business succeed, I am having difficulty understanding how will they do so if they remove the potential for much needed employee housing in these areas. Please be thorough and thoughtful in your considerations when making your decision.

Respectfully,

Sara Salzgeber Jones

A solid black rectangular redaction box covering the signature area.

From: [Dale Sarna](#)
To: [Council](#); [Shared.MunicipalClerk](#)
Subject: Removal of Housing in both IND 1 and IND 2
Date: September 1, 2024 8:00:30 PM
Attachments: [Screen Shot 2018-12-14 at 3.12.41 PM-5-9.png](#)

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Hello Council,

I'm emailing to express my concern for the proposed by-law amendment to IND 1 and IND 2, removal of the employee housing.

I own several businesses in the Bow Valley and housing is always a major concern. The current change in Federal Government LMIA applications, cost of housing, etc., makes it hard to run a business and make profit. As you know, businesses need to make profit in order to function.

As an owner of a unit with a tenant in IND 1, I oppose this proposed by-law change for obvious reasons of increasing employee housing in the Bow Valley.

Best regards,

Dale Sarna
RE/MAX Alpine Realty
Co-owner/Associate Broker



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From: [Vijay Sethi](#)
To: [Shared.MunicipalClerk](#)
Subject: Land use bylaw amendment
Date: August 30, 2024 2:30:33 PM

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To Municipal Clerk

I own lots [REDACTED] on Bow Valley Trail, [REDACTED]. I would like the opportunity to be able to speak at the Public Hearing on 3rd September. I would like to see 5.4.6.4 removed or at least 30%

Changed to upto 75% for dwelling units on upper level/s. This will help address current and future shortages in accommodation.

Additionally, due to unprecedented beauty of Canmore, exterior of building should be world class by extensive use of Rundle Rock to present quaint mountain village atmosphere, particularly for any property lying along Bow Valley Trail.

I sincerely thank you, if you could grant me this opportunity to address my views on the town I love so much.

Vijay Sethi

From: [Dustin Taylor](#)
To: [Steve Ashton](#); [Shared.MunicipalClerk](#)
Subject: RE: Bylaws 2024-07 and 2024-08 - Removal of employee housing from IND2
Date: September 3, 2024 9:19:05 AM
Attachments: [image002.png](#)
[image003.png](#)

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Hello Town of Canmore council and Mayor,

Steven Ashton from Ashton Construction could not have expressed our concerns and position on this matter any better. I hope this is taken into consideration when reviewed by council.

Thank You



Dustin Taylor
Cascade Mechanical Ltd



www.cascademechanical.ca

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From: [Nicole Tremblay](#)
To: [Shared.MunicipalClerk](#)
Subject: industrial land use by-law amendment
Date: August 27, 2024 6:50:17 PM

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Hi, I am writing to express my support for the proposed by-law amendment to remove housing as a discretionary use in industrial zones. I also fully support honouring all existing residential permits as proposed.

Thank you,
Nicole Tremblay

--

Nicole Tremblay

