

November 3, 2010

Andrew & Carmen Pearson
Box 366
Bragg Creek, AB T0L 0K0
CANADA

Dear Mr. & Mrs. Pearson:

Re: Area Concept Plan – PTN: E ½ 30-22-04-W5M & N ½ 19-22-04-W5M & SE 19-22-04-W5M

Please be advised that at its October 14, 2010 meeting, Council passed the following resolution:

MOVED that Council acknowledge that all conditions have been addressed to the satisfaction of the Municipality and therefore adopts the Rusticana Estates Area Concept Plan within the East Half of Section 30-22-4 W5, the North Half 19-22-4 W5 and SE 19-22-4 W5.

Should you require any further assistance please contact Brenda Bartnik of our Planning Department.

Sincerely,
MUNICIPAL DISTRICT OF FOOTHILLS NO.31

Judy Gordon
Coordinator/Planning Department

JG/sj

Rusticana Estates Area Concept Plan

**Submitted on behalf of the residents of Rusticana by Andy Pearson
February 2010**

Final plan submitted September 2010

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Area Concept Plan for Rusticana Estates

Summary

Rusticana Estates comprises the east half of S30, T22, R4 W5 together with the NE quarter of S19, T22, R4, W5 and one parcel in the SE quarter of the same section. As shown on Figure 1, it is located in the north-western part (area 4) of the MD of Foothills and a centre point of the area lies approximately 3.2 kms from Highway 22x, the northern boundary of the MD and approximately 1.1 kms east of the western boundary of the MD.

Rusticana ACP – Location within the MD of Foothills

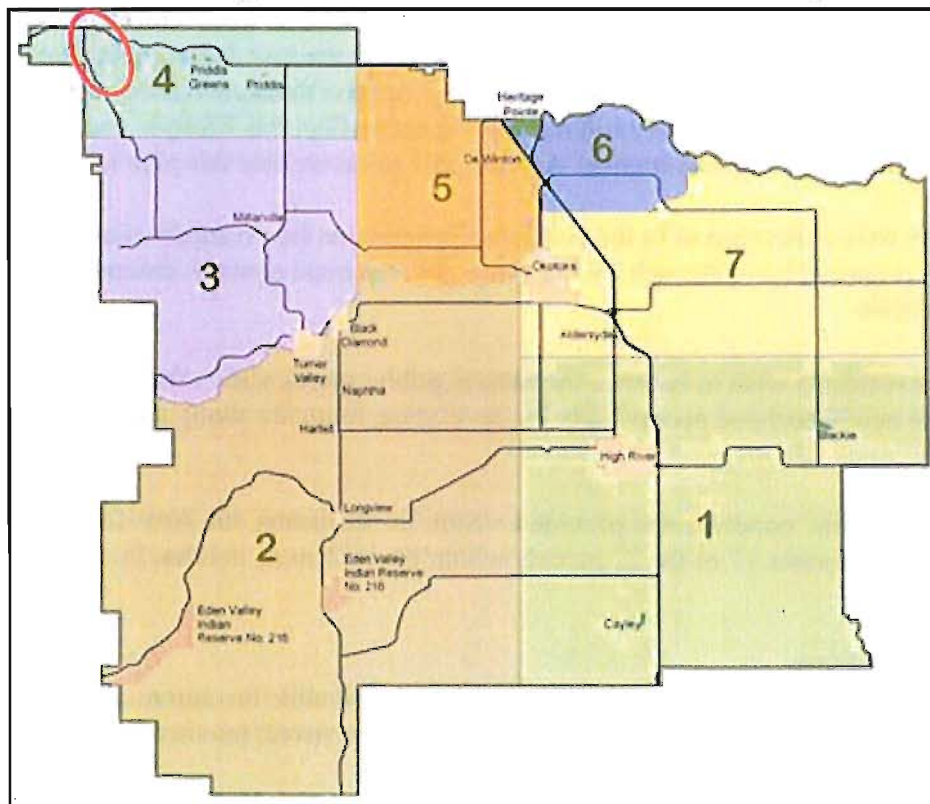


Figure 1

The north and south Rusticana area comprises approximately three quarters of a section and contains 22 parcels with 20 long term and stable residences each having large Country Residential parcels, the majority 16-20 acres in size with one remnant of 68 acres (currently zoned Agricultural). During 2009, following numerous discussions between residents, a survey was taken to ascertain the views and outstanding issues of the community and this was subsequently forwarded to the MD Foothills in September 2009.

The results of the survey showed that 92% of the 22 landowners in the half section were supportive of the outstanding issues and following subsequent discussions with the MD and Councillor Waddock, the residents were supportive of generating an ACP to address the issues. In particular, the residents are strongly of the opinion that a landowner driven ACP will return to the residents a sense of ownership in the future direction of these issues.

Subsequently and following further discussion with residents concerning this ACP proposal, seventeen out of the 22 (77%) residents support this ACP proposal. and the results of the survey show that:

- Eight of the 22 owners (36%) wish to subdivide their land at some non-defined future time. Nine of the owners (41%) do not wish to subdivide but want to retain the future possibility of subdividing for their heirs and do not object to others subdividing their parcels into two.
- Of those 77% who would like the option to subdivide, all wish to limit future subdivision of the area to no more than twice the current density to retain the low density of residency which we currently enjoy. These residents are of the opinion that subdivision of the current 16-20 acre parcels into two parcels will not significantly affect this lifestyle and all are prepared to enter into a legal agreement with the MD to ensure that this plan is fulfilled.
- All residents were concerned as to the possible restriction on future subdivision, even to the low density proposed here, through MD or other governmental controls independent of technical criteria.
- Many of the residents wish to enhance the natural public spaces within the Rusticana area and increase neighbourhood accessibility by developing footpaths along undeveloped road allowances.

To address the residents' concerns and provide a vision for Rusticana, the Area Concept Plan here proposed, incorporates 17 of the 22 parcels within the ACP area, and has the following elements:

Primary Considerations

1. Limit future subdivision of Rusticana into a maximum of double the current density by allowing current land holders to subdivide each 14-20 acre parcel into no more than two parcels total.

2. Continue with the plans to have an MD supported piped water system for those in the ACP area who want to tie into it.

Secondary Considerations

1. Enhance the natural public spaces by rehabilitating the beaver pond environment on the MD Foothills Reserve land.
2. Mitigate the effect of potential increased road use by judicious placing of speed restrictions on the subdivision loop road off Highway 762.

The other issues, increasing neighbourhood access through the development of a footpath system and increasing internet connectivity through using the Burby Fire Hall antenna, have been deferred to another initiative which is currently in the process of development by the MD through local resident involvement

The following Area Concept Plan describes the land and its natural characteristics, puts Rusticana into its geographical context with respect to road infrastructure, land use and MD zoning and addresses water issues..

Finally, it should be noted that, unlike other ACP's which have been put before council, this is not a proposal from an individual or small number of developers concerning previously undeveloped land. Rather this is a 'from the heart' proposal by eighteen, mostly residential, landowners of 15-20 acre parcels, who want to retain control over what happens in their little bit of paradise and influence the future direction of growth in the area covered by the ACP.

Introduction

The drafting of this Area Concept Plan (ACP) is the result of a private survey which was undertaken in April and September 2009 following concerns on the part of a number of landowners having 15-20 acre parcels regarding future planning initiatives as a result of the Calgary Regional Planning discussions between MD of Foothills and the City of Calgary. At the same time, a community water system to the south of Rusticana is being proposed which offers a timely opportunity for those landowners who are interested in tying into a piped water system.

The intent of this ACP is to provide an overall vision for the Rusticana area which will address the potential for subdivision on each of the parcels within the study area together with options available for alternative water supplies.

The goals of the plan are to legitimise the views of the residents of Rusticana by:

- Providing an overall development and servicing vision for Rusticana, including plans for the public (including MD) lands which lie within the general area.
- Addressing the potential for limiting subdivision on each parcel within the study area, and,
- Ensuring that adequate water may be provided to each parcel in accordance with the Provincial Water Act.

By knowing that both the residents as a whole and the MD have jointly bought into a mutually agreeable plan, this will allow the residents to, once again, return to being able to plan for the future.

Growth in the study area is directed by the following policy documents, based on hierarchy:

- Municipal Government Act
- Provincial Land Use Framework
- MD Foothills Municipal Development Plan (2001)
- MD Foothills Land Use Bylaw

Water servicing is directed by the Alberta Provincial Water Act.

The area covered by this ACP is defined as being the majority of the east half of S30, T22, R4 W5 together with the NE quarter of S19, T22, R4, W5 and one parcel in the SE quarter of the same section. The legal description of the land parcels to be included in this ACP, together with a map showing parcel locations, is presented as Appendix 1.

This ACP is a community driven exercise and the document has been prepared by residents within the study area with support from MD of Foothills staff as and when required.

Rusticana Site Aspects

Geographic Location

Rusticana Estates is defined as being the majority of the east half of S30, T22, R4 W5 together with the NE quarter of S19, T22, R4, W5 and one parcel in the SE quarter of the same section as illustrated in Figure 1. It is located in the north-western part (area 4) of the MD of Foothills and a centre point of the area lies approximately 3.2 kms from Highway 22x, the northern boundary of the MD and approximately 1.1 kms east of the western boundary of the MD.

As shown in Figure 2, the closest population centre is Bragg Creek, located approximately 5 km to the north, in which there are a variety of shops and services, a bank and the local post office. Banded Peak School is located between Bragg Creek and Rusticana, approximately 3 km north along Highway 22. Rusticana is located 50 km NE of High River and 34 km WSW of Calgary.

Rusticana ACP – Geographic Location

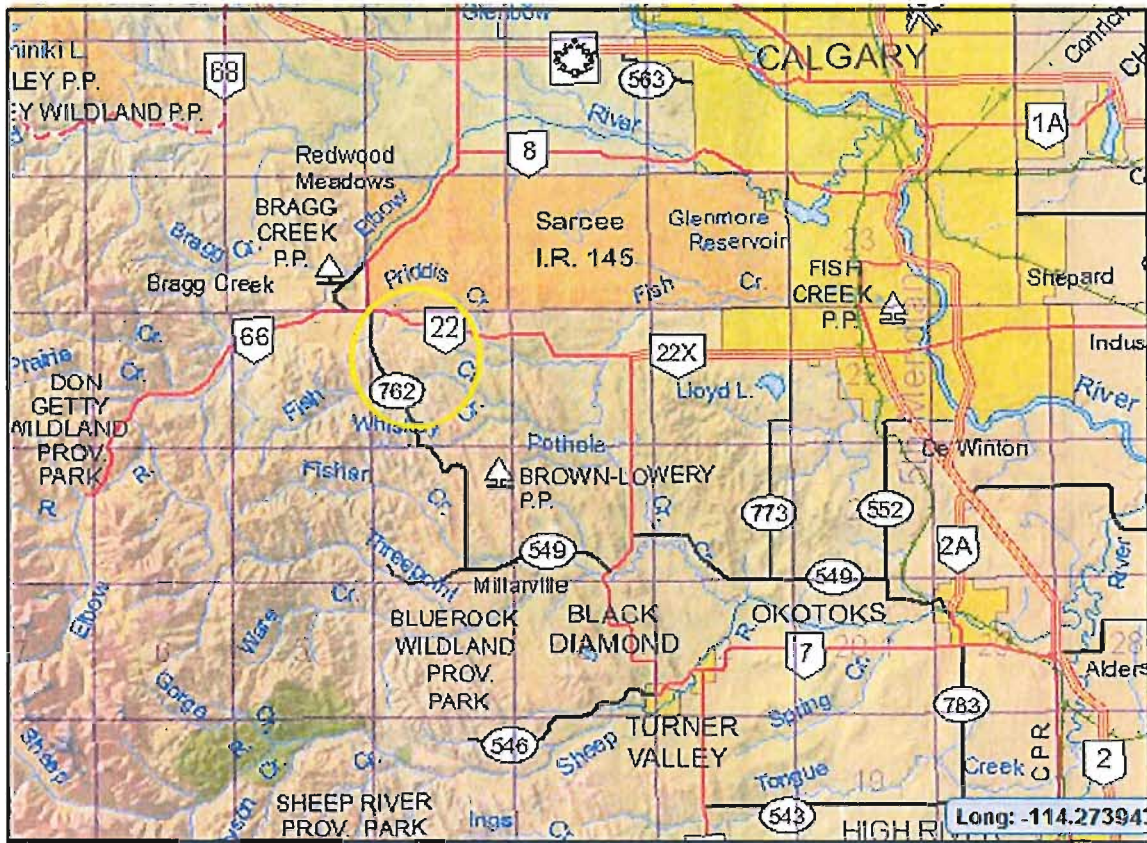


Figure 2

The topography, as illustrated in Figure 3, consists essentially of two WNW-ESE trending ridges 250 and 250m wide separated by a small valley approximately 400m wide opening out to the east south east. Vertical elevation ranges from 1330m in the south eastern part of the valley to 1390 m along the highest western ridge. The northern part of the area comprises a small plateau area having elevations of about 1380m whilst the western parts of the southern part of Rusticana comprise a west facing slope that forms the eastern side of another WNW-ESE trending valley which lies outside the area of this plan.

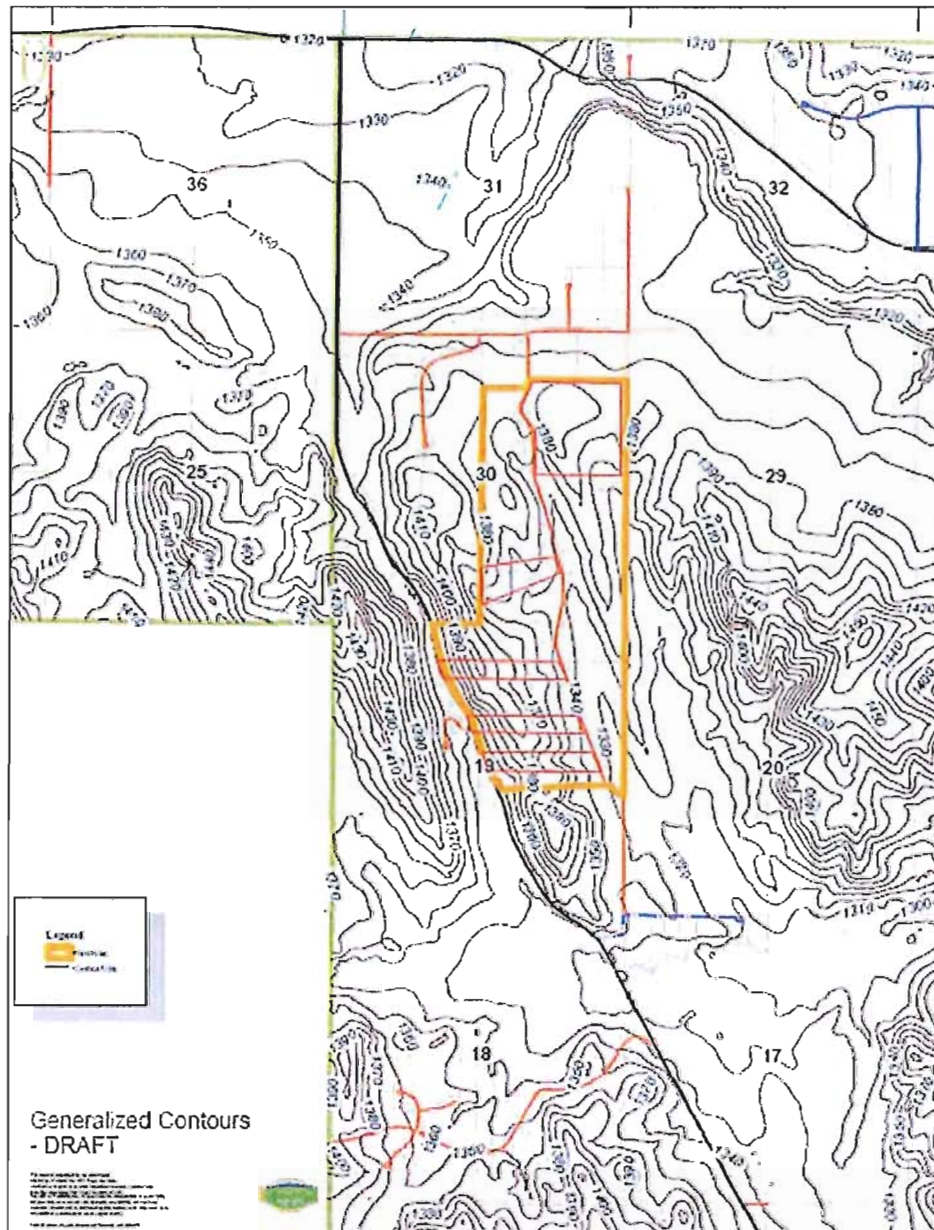


Figure 3

Drainage within the valley comprises an intermittent stream which drains towards the ESE and joins Fish Creek approximately 1000m south of the southern boundary of the area of interest. The stream is usually dry over the summer period.

Transportation Network

Rusticana is bisected by a WNW-ESE trending, MD of Foothills gravel road. This road is a subdivision access loop lying east of Highway 762 which is the main north-south MD maintained hard-topped road from Highway 22 in the north to Millarville in the south. The main

provincial road in the area is Highway 22 which provides north-south and east-west access to the rest of the province. Highway 66, a provincially maintained east-west trending road providing ready access to Kananaskis in the west lies 3.4 kms NNW of Rusticana.

Figure 2 shows the road access and location with respect to main population areas.

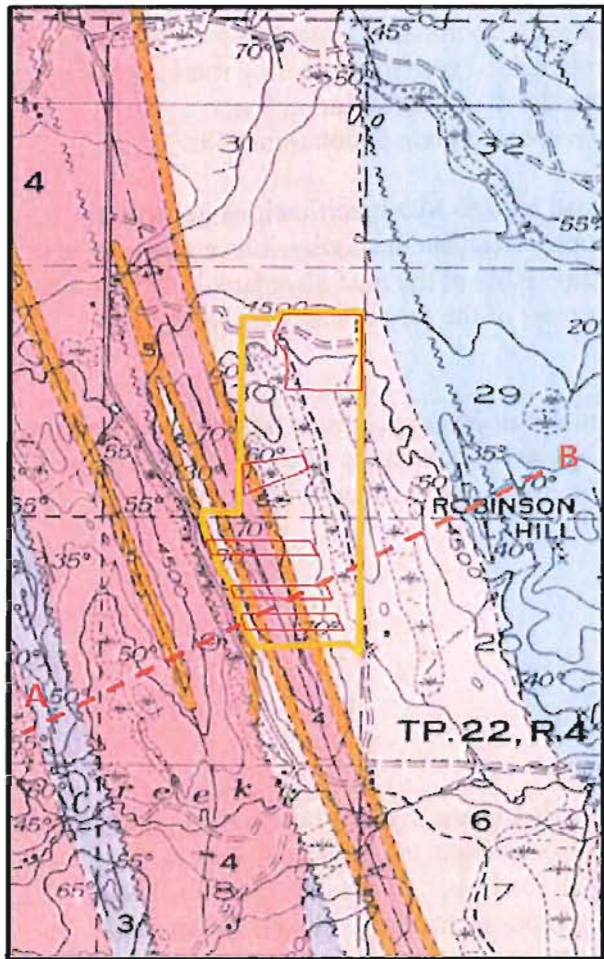
The MD access road is a well maintained gravel road built to MD specifications in the early 1970s to service the Echo Hills and Rusticana Country Residential subdivisions and has regular grading and snowploughing as circumstances require. Parts of the road have been oiled for dust control and a 50 km/hr speed limit is in place over most of the area to maintain safety for children, walkers and horse riders.

The community understands that if subdivision and development occurs to the extent necessary to upgrade the access road (to be further clarified by the MD), then the MD will look to those landowners who have subdivided their land to assist in the cost recovery of those upgrades.

Land Characteristics.

Bedrock Geology

As can be seen in geological map Figure 4, the entire Rusticana area is underlain by rocks of the Upper Cretaceous Alberta Group, which comprise, from bottom to top, the Blackstone (or Lower Alberta) Formation, Cardium Formation and Wapiabi (or Upper Alberta) Formation. The Wapiabi Formation, the formation of interest here comprises an approximately 500m thick section of thick marine shales and siltstones with a few sandstone and limestone members. Subsequent to deposition, during the Tertiary tectonism associated with the creation of the Rocky Mountains, the rocks were folded and faulted with the bed-dips in the Rusticana area of 50-70 down towards the ENE.



Rusticana ACP Bedrock Geology

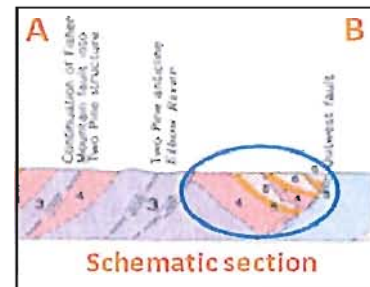
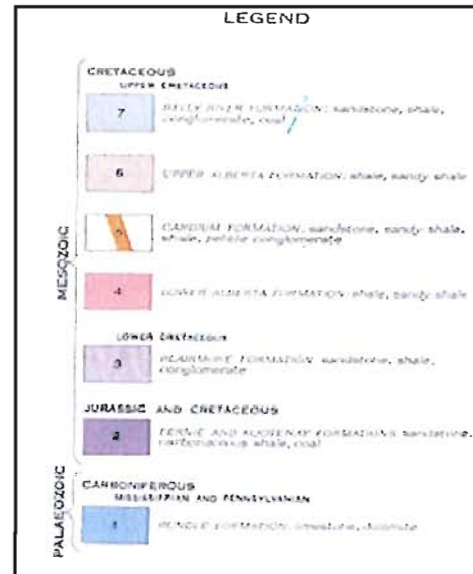


Figure 4

The geological map was made in 1942 and reflects the then current road system. It clearly shows the geological structure which comprises a tightly folded NNW-SSE trending anticline with outcropping and more resistant Cardium sands forming the crest of the most westerly of the ridges in Rusticana. Further to the east, underlying the majority of the ACP area, steeply dipping Wapiabi is present and it is the thin resistant sandstone beds within this formation which probably form the more easterly of the ridges. Given that sandstones provide the highest potential water reservoirs, the subsurface distribution of these sand units has an impact on well water supply.

Surficial Geology

Overlying the bedrock geology, the surficial geology of the Rusticana is as illustrated in Figure 5. It comprises for the most part, slightly leached tills and colluvium with, in the northern part, an area of glacial-lacustrine deposits.

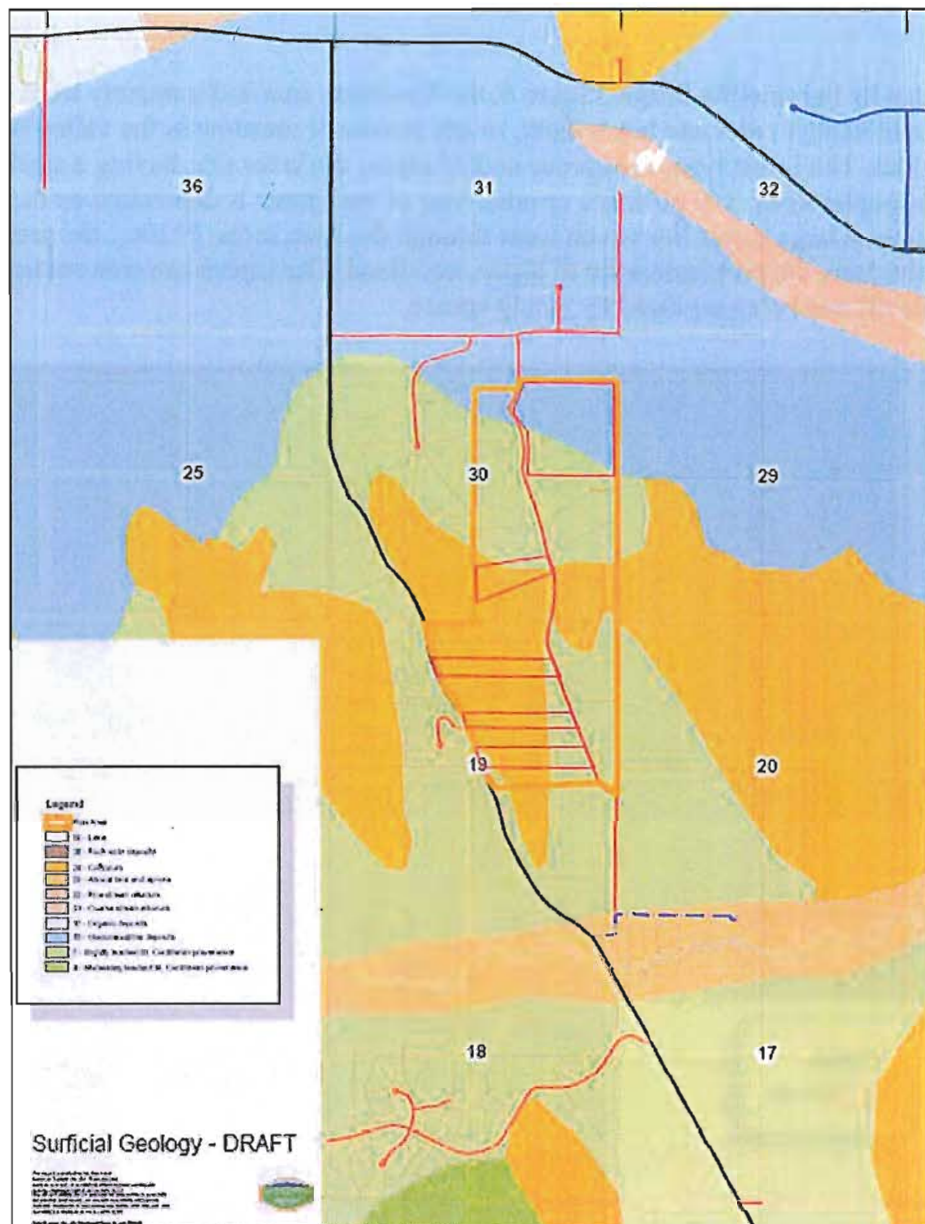


Figure 5

In general, the valleys are floored with interbeds of peat and blue clay, each of varying thickness, representing periods of wetland and shallow lake development respectively. The two ridges comprise for the most part a clayey soil containing pebbles and rocks of variable size and are probably underlain by ridges of shale or siltstone. Locally, there are thin gravel beds.

Vegetation

As can be seen by the satellite image, Figure 6, the Rusticana area is dominantly treed on the ridge crests and valleys sides and has willow, rough pasture or meadow in the valley bottoms and low valley sides. The forest types are spruce and/or aspen, the latter also having a small proportion of poplar trees. The presence or otherwise of the spruce is dependent on the degree of destruction from a large forest fire which went through this area in the 1930s... the greater the destruction the more the preponderance of aspen woodland. The aspens are now mature and are starting to die off and being replaced by young spruce.

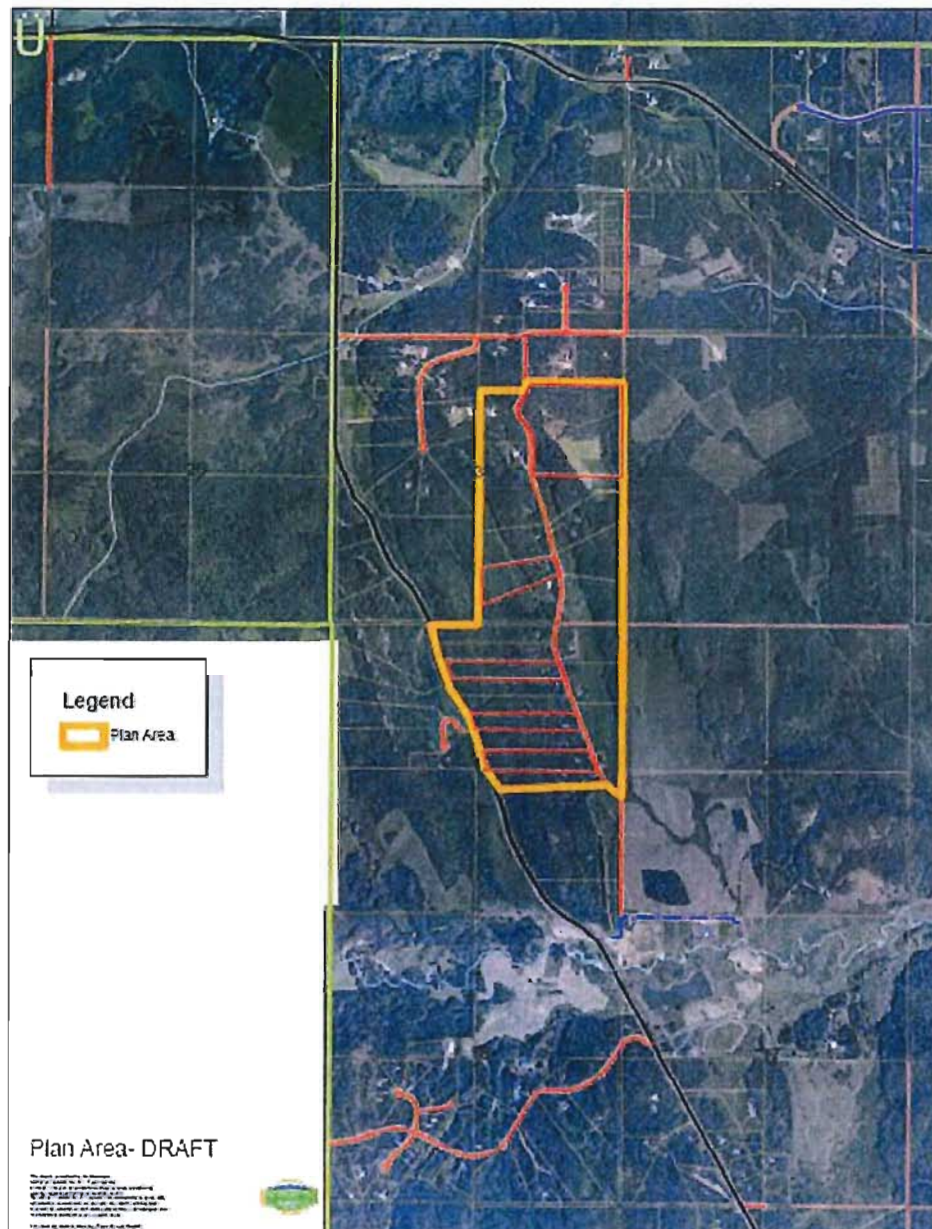


Figure 6

Wildlife

Animal wildlife is abundant and variable with white-tailed deer, moose, coyote and cougar being the larger resident type. There is usually a seasonal appearance of bear in most years. Smaller mammals are environmentally constrained and include mice, muskrat, rabbit and, prior to their extermination by the MD, beaver. Birdlife is extensive and includes starlings, jays, red-tailed hawks, Downey and hairy woodpeckers and grey owls.

Land Use

Land Use Patterns.

The land use map Figure 7 shows that the entire north-western part of the MD Foothills is classified by the Canada Land Inventory as being 'Productive Woodland' and 'Non-productive Woodland' with a local area of 'Rough Grazing' along the Fish Creek valley to the south of Rusticana. Although some of the woodland has been cleared for pasture in the Crown land to the east and on the most north-easterly of the parcels in Rusticana, none of the area is deemed suitable for agriculture because of the soil quality and relatively short growing season in this area.

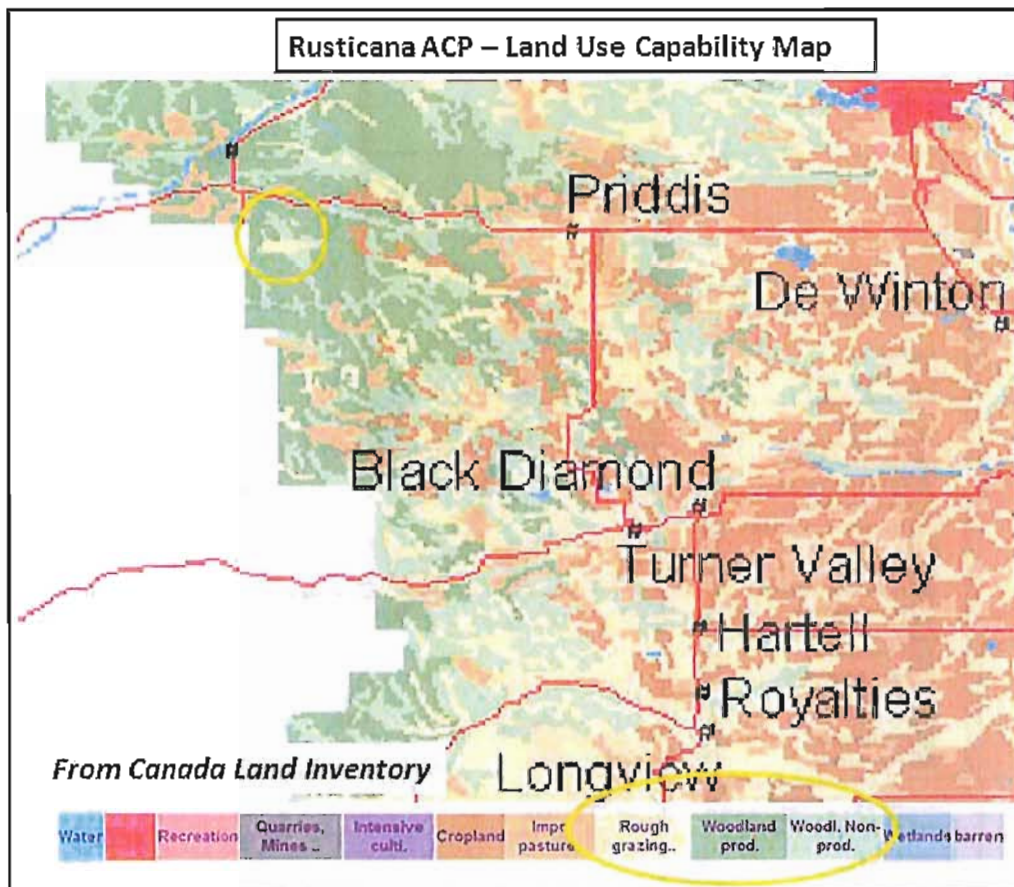


Figure 7

Given the limited agricultural potential of the area, subdivision of the land for residential use commenced in the mid-1970s with the creation of Rusticana Estates in addition to numerous other developments in this north west part of the MD of Foothills. Rusticana itself comprises approximately a half section of twenty two 15 to 20 acre parcels together with one 70 acre parcel. As can be seen in the MD Foothills Land Use map (Figure 8), these are all zoned Country Residential with the exception of the 70 acre parcel which is zoned Agricultural as per the MD Foothills Land Use Bylaw. In addition to the 22 lots, there is one 17 acre parcel of Municipal Environmental Reserve and a 2 acre Commercial Rural parcel on which the Burby fire-hall is located.

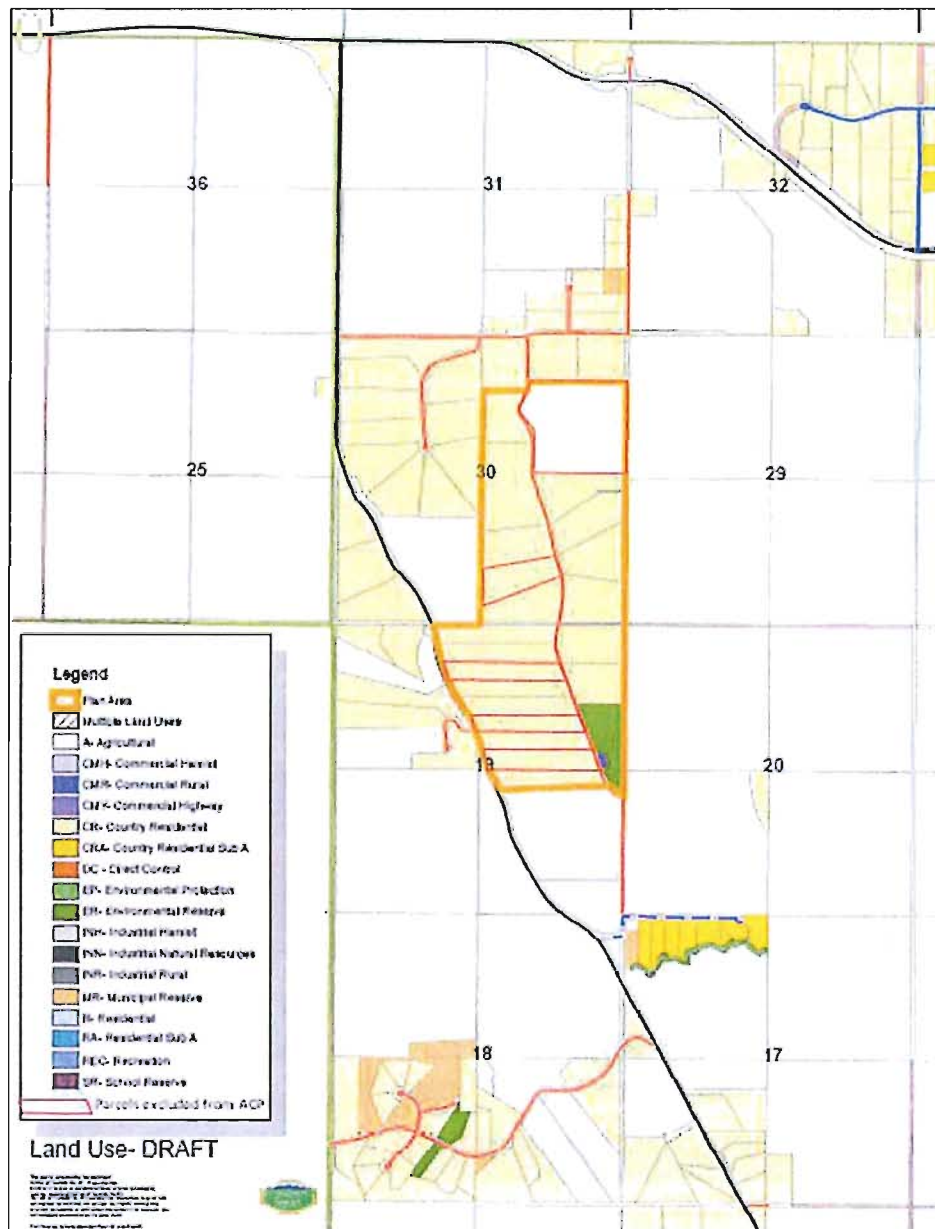


Figure 8

Existing Development in Rusticana

Of the 22 land parcels within the Rusticana Area, 19 (86%) have homes built on them and the remainder are as yet undeveloped. At least two of the owners of the undeveloped parcels intend building a house and moving onto the land at some undefined time in the future. Most of the houses were built in the 1970's and are of modest size, though many have been upgraded. The last house was built in early 2000. All the homes are owner occupied and are single family, with a well or a well and cistern system supplying water. All homes have a septic system to handle sewage and grey water.

In addition to the housing, there is a small fire hall (the Burby Fire Hall) which was built during the 1980's on a 2 acre Commercial Rural parcel at the south-east extremity of the Area. This is now inactive due to the subsequent building of the emergency services centre at Priddis and the building is now used infrequently by the local community association.

Two small farms are presently raising horses and a few cattle and sheep.

Land Density Issues

As previously indicated, the 22 land parcels within Rusticana are zoned Country Residential with the exception of one residual 68 acre parcel which is zoned Agricultural. As seen in Figure 8, the land surrounding the area of interest can be summarised as follows:

- The half section immediately west comprises two subdivisions totalling 18 parcels 12 to 20 acres in size zoned Country Residential together with residual Agriculture zoning. The section to the west of these subdivisions is zoned Agricultural.
- Immediately north of the area, there are a series twelve Country Residential parcels in the SE quarter of Section 31 varying in size from 4.2 to 17.8 acres. The remaining portion of the Section 31 is zoned Agricultural. Sections 36 and 32, respectively NW and NE of Rusticana are all zoned Agricultural
- Immediately east of Rusticana, Section 29 is a zoned Agricultural and is Alberta Crown land currently held on a grazing lease by local ranchers.
- To the south east, section 20 also has Agricultural zoning other than one 6.6 acre parcel having Country Residential zoning. The NW quarter of section 17 has seven 4 to 6 acre Country Residential parcels with the remainder being zoned Agricultural.
- To the south, the southern half of Section 29 and all of section 18, comprises Agricultural zoned land, which separates Rusticana from Aspen Creek Estates, a subdivision of twenty six, mainly smaller, 3 to 5 acre parcels.

In all the above cases, that land which is zoned 'Agricultural', is actually used predominantly for rough grazing with pasture and haying being carried out in the cleared areas.

Figure 9 provides a summary of the parcel sizes within Rusticana and the surrounding areas.

It is clear from the above that the ACP proposal here is well within the locally defined precedence's of land use density.

Water and Septic Issues

Water well data

The Government of Alberta maintains an archive of all water wells drilled in the province and all pre-existing data was digitised during the 1990s and subsequent data has been added as the wells were drilled. Figure 10 is taken from the government web site and shows the locations of the wells as per their files.

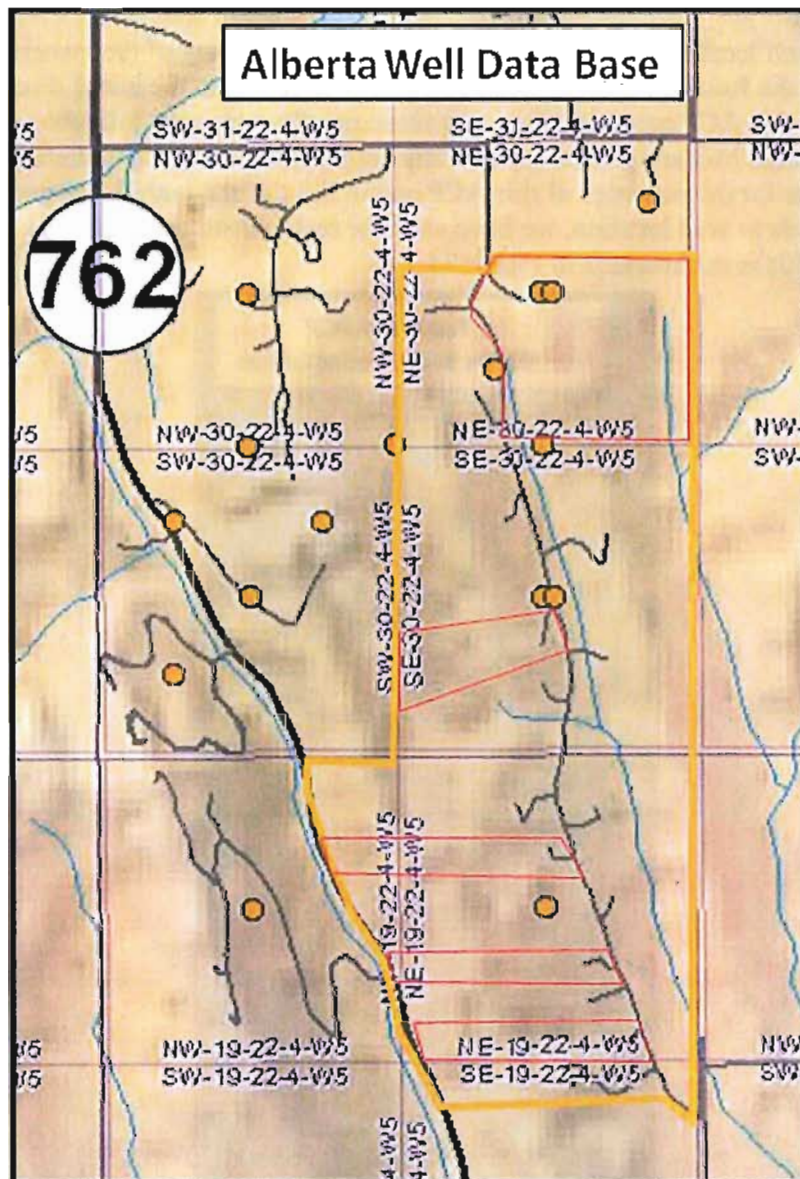


Figure 10

Unfortunately, the well locations are not readily available for the vast majority of the wells because the locations of older records have been put at the centre points of the LSD to which the well was referenced rather than the legal description of the land parcel i.e. the location could be out by half a mile or more. Only the latest wells drilled after the digitisation of the Alberta data base are located on the applicable land parcel. This has resulted in the occurrence of over 10 wells placed in some centre section locations and the only way of cross-referencing the older wells (i.e. the majority) to the present parcels is by knowing the names of previous owners who initially paid for the wells to be drilled and this is beyond the scope of the ACP study at the present time.

To address the well location issue, during 2009, an informal survey of the owners for the well productivities of the Rusticana area was undertaken in response to the initial discussions of what has now become this ACP proposal. This was subsequently expanded following a request for information from the MD and a local piped water supplier to potentially undertake to supply piped water. Thus for the purposes of this ACP and in light of the inability to geographically assign well records to well location, we have used the resident survey to give an indicator of well productivities. This is summarised in Figure 11.



Figure 11

In general, well water supply in the area, while not short, is geographically variable, ranging from 1 to 20 gpm per well, probably due to the local variations in geology. Those residents with low well rates either make do or have water shipped in to cisterns. Water quality is also variable but is generally hard with variable iron and some H₂S.

Piped Water System

A new proposal was received in 2009 from the Fish Creek Ranch (FCR) piped water system, supported by the MD Foothills, in which a water pipeline would be installed along the subdivision road and residents tap into it for domestic piped water. Ten of the land owners (45%) are presently interested in a piped water system on an as is basis and at least one other resident is interested in a future tie-in, subject to cost and timing. It is anticipated that additional residents would be interested in a tie-in to a pre-existing water system following future subdivision of individual parcels.

The proximity of the FCR water plant to Rusticana (shown on Figure 11) provides a unique opportunity, specific to the immediate area, which has no deleterious impact on either those parcels which do not want to tie in at this time or other parts of the MD outside this area. We urge the MD to continue planning and executing the water system proposal.

Were a water system to be made available, to address future subdivision, those owners interested wish to pursue the concept of having a water licence transferred to each parcel. Thus, for each parcel, a water licence may be used by the present residence; may be used by the future subdivided parcel; swapped from one to the other (permanently) on subdivision; or the pipe capped until subdivision of the parcel is undertaken. It is understood that there are precedents for this type of proposal already present in the MD. All water issues, of course, are conditional upon availability and costs of licence (if any), pipeline construction and water supply.

Water supply is generally taken to be the most unpredictable technical issue for subdivision in this area and the other technical issues – building site, access and septic drainage, are essentially addressable and non critical for all the parcels in our area. As such, the association of the water licences with the land parcels will remove the future risk of not proving water as one of the technical criteria for subdivision and obviate the necessity of drilling water wells. The residents see the availability of a water system as a utility resource akin to the initial provision of gas and electricity to this area in the 1970s.

Septic

All parcels with houses currently have a septic system. Any new parcels which are subdivided will have septic systems constructed to MD specifications as per the Alberta Private Sewage System Standard of Practice 2009.

Other Considerations

In addition to the density and water issues, which form the primary concerns of this ACP, the residents would like to have the following included as items of a secondary nature but which will enhance the quality of life of residents both within Rusticana and the surrounding area. The two items are rehabilitation of the MD Reserve land and the judicious placement of speed restrictions on the MD gravel loop-road off Highway 762. These are summarised as follows:

1. Reserve Land Rehabilitation

As shown in Figure 8, the extreme south-eastern parcel in the ACP area comprises 18 acres of MD Foothills Reserve land and includes an area that was, until the early 2000s a series of well developed beaver ponds and associated richly developed flora and fauna. Following extermination of the beavers by the MD (due to road damage), the attraction of this area has been significantly reduced both to the eye, in the resurgence of unsightly underbrush, grass and willow, and from the 'wildlife reserve' aspect.... the area is effectively 'dead'.

The residents would like to propose that this area, also shown on Figure 12, be rehabilitated by the encouragement of beavers to re-colonise the valley flat. The re-establishment of the beaver ponds would then attract the prolific bird, amphibian and small mammal life which had been present from the 1970's to the beavers' demise early this century.

Whilst the residents recognise that the MD exterminated the beavers as a means to effectively protect the road infrastructure, they now believe, especially in these more enlightened times, that there may be other measures which might be taken to protect the road and still permit the beaver colony to exist. To this end, whilst the residents may be able to provide voluntary labour to help, it is requested that the MD undertake a review of the technical aspects to determine if this is a viable option.

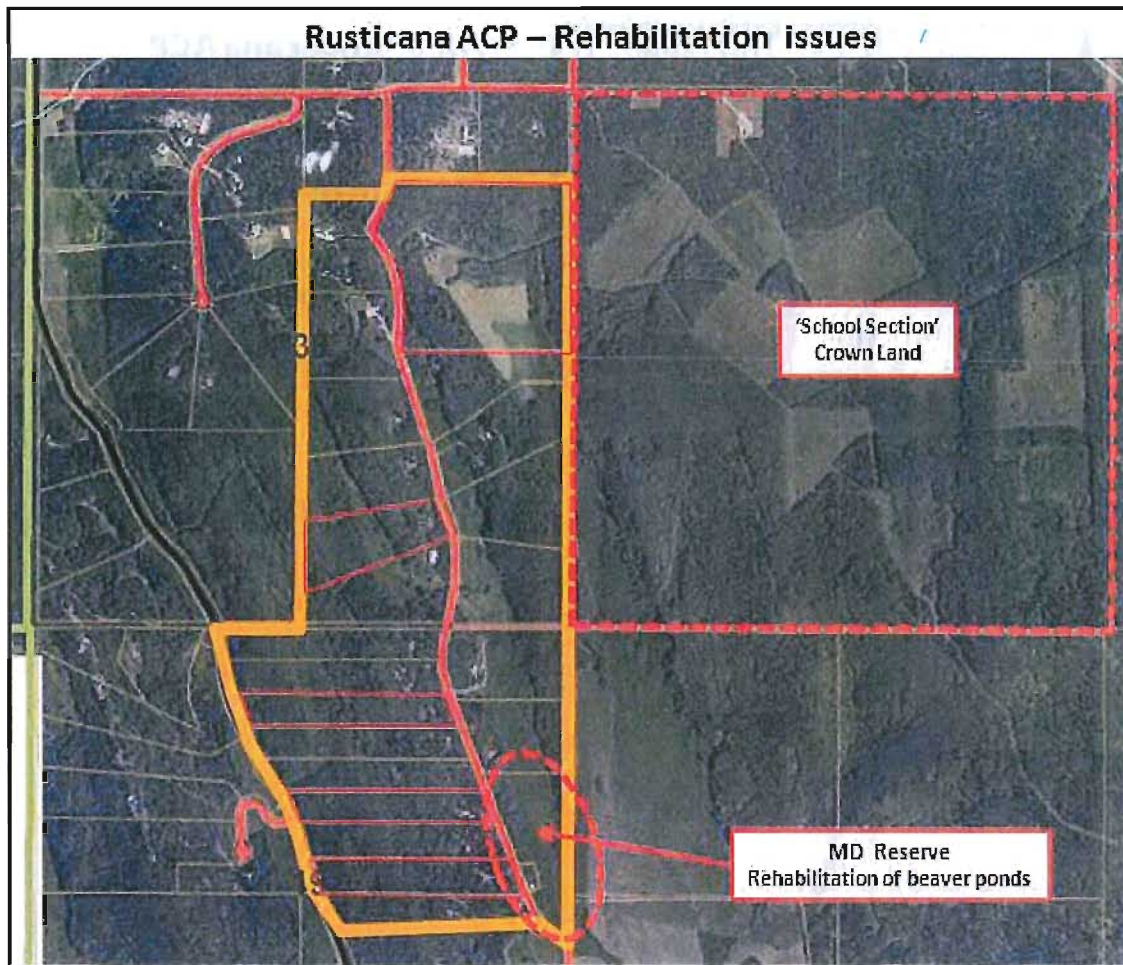


Figure 12

2. Speed Restrictions

The main MD gravel loop road currently has a 50km/hr speed restriction for safety of children and horse riders with the speed limit signs located on Figure 13. The residents would like to expand the distance of speed restriction to that also shown on Figure 13 by changing the placement of the speed limit signs. This not only increases the safe zone for walkers, children and horse riders, but also mitigates the impact of any increased traffic which might result from the increased parcel density and at the same time it immediately reduces the impact of current road traffic for those 2 residents living on the main access feeder to Highway 762.

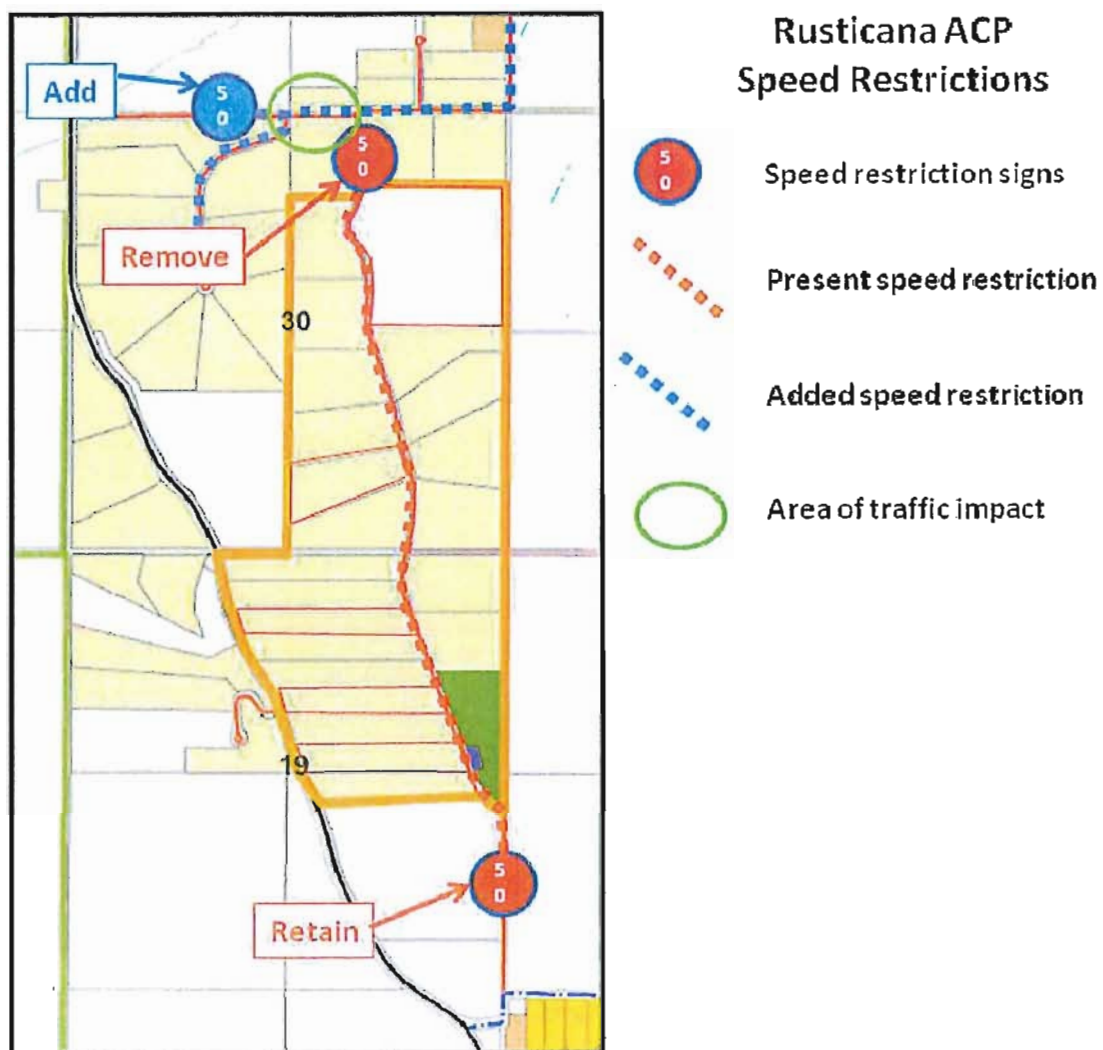


Figure 13

Conclusions

The Rusticana ACP comprises approximately three-quarters of a section of 21 Country Residential and one Agricultural zoned land parcel located in the north western corner of the MD Foothills. It was originally developed in the mid-1970s into parcels of 14-20 acres with a 68 acre remnant.

The landowners of this geographically defined area, following community discussion and concern about future planning issues resulting from the 2009 Calgary Regional Planning proposals, initiated the development of a common vision on the future direction of development within the Rusticana area. To this end, and following consultation with the MD of Foothills and Terry Waddock, the local council representative, the residents have generated this ACP which has the following considerations:

Primary Considerations

1. Limit future subdivision of Rusticana into a maximum of double the current density by allowing current land holders to subdivide each 14-20 acre parcel into no more than two parcels total.
2. Continue with the plans to have an MD supported piped water system for those in the ACP area who want to tie into it.

Secondary Considerations

1. Enhance the natural public spaces by rehabilitating the beaver pond environment on the MD Foothills Reserve land.
2. Mitigate the effect of potential increased road use by judicious placing of speed restrictions on the subdivision loop road off Highway 762.

As indicated in the foregoing report, the geography, geology and land use within the area encompassing the ACP are such that the initiatives proposed here fit very well both within the confines of Rusticana itself and also the dominantly Country Residentially zoned areas within the immediate area out-with the ACP, parts of which have been subdivided into a higher density than that proposed here.

Finally, it should be noted that, unlike other ACP's which have been put before council, this is not a proposal from an individual or small number of developers concerning previously undeveloped land. Rather this is a 'from the heart' proposal by twenty, mostly residential, landowners of 15-20 acre parcels, who want to retain control over what happens in their little bit of paradise and influence the future direction of growth in the area covered by the ACP.

Appendix 1

Legal Description of Parcels Included in the ACP



Parcel	Legal Description	Owner(s)	
1	Lot 2 Plan 7258JK NE30;22;4;W5	Lan	
2	NE30;22;4;W5	Gablehouse	
3	Block 4 Plan 93LK SE30;22;4;W5	Denning	
4	Lot 5 SE30;22;4;W5	Knill	
5	Not Included in ACP	Nowicki	
6	Block 7 Plan 1720LK SE30;22;4;W5	Kiss	
7	Block 8 Plan 1720LK SE30;22;4;W5	Pearson	
8	Block 9 Plan 7510465 SE30;22;4;W5	593397 Alberta Ltd	
9	Block 10 Plan 7510465 SE30;22;4;W5	Huppe	
10	Block B Lot 3 Plan 0612484 SE30;22;4;W5	Billimum Holdings Ltd	
11	Not Included in ACP	Martin	
12	NE19;22;4;W5	Sidwell	
13	Lot 7 NE19;22;4;W5	Antoniuk	
14	Not Included in ACP	Benson	
15	Block A Plan 8087JK NE19;22;4W5	Powell	
16	Lot 4 NE19;22;4W5	Tim Perizzolo	
17	Not Included in ACP	Cappis	
18	Lot 2 Block 2 NE19;22;4W5	Ted Perizzolo	
19	Not Included in ACP	Williams	
20	SE19;22;4W5	Middleton	
21	Plan 8087JK NE19;22;4W5	Bolduc	
22	Plan A Block E NE19;22;4W5	Giammarco and Co	

Rusticana Estates ACP

Appendix 2

Access Strategy for Participating Properties

The MD of Foothills Public Works department prepared an access strategy for the properties included within the Rusticana Estates ACP. The primary reason for the access strategy is to ensure continued safe ingress and egress for each property in question, including consideration for speed limits along 1368 Drive W, and associated site distances.

A description of each property's recommended access strategy is indicated in the table on the following page. The properties are identified with roll numbers and correspond to the attached map (page 30).

Roll Number	Lot Number	Access Strategy	Considerations
	* as referenced on page 25 of the ACP		
2204307510	1	access at the south of the existing lot	hill and road curve
2204307520	2	access anywhere	
2204300010	3	access anywhere	
2204300020	4	access anywhere	
2204300040	6	access across from existing approach at 2204300050	limited site distance due to hill
2204300050	7	access across from existing approach at 2204300040	limited site distance due to corner
2204300060	8	access by way of common approach with 2204300000, across from the existing access of 2204300030	
2204300000	9	access anywhere	natural drainage (may not need culvert)
2204300070	10	access anywhere	natural drainage (may not need culvert)
2204195060	12	access by way of common approach with 2204197500	
2204197500	13	access anywhere	hills may create site distance issues at certain points
2204197520	15	access anywhere	hills may create site distance issues at certain points
2204197530	16	access anywhere	hills may create site distance issues at certain points
2204197570	18	access anywhere	hills may create site distance issues at certain points
2204190010	20	access anywhere	hills may create site distance issues at certain points
2204197590	21	access anywhere	hills may create site distance issues at certain points
2204197600	22	access across from existing approach at 2204195060	limited site distance due to corner

