



Hon. Ric Mclver
Minister of Transportation, Deputy House Leader
Sent via email to: transportation.minister@gov.ab.ca

May 10, 2019

Re: Road Permit Changes

Dear Minister Mclver,

The Rural Municipalities of Alberta (RMA) represents the interests of Alberta's 69 rural municipalities, which together manage 85% of Alberta's land base. RMA's members manage 77% of Alberta's roads 61% of its bridges. As a result, RMA has a vested interest in changes to the permitting and regulatory process for commercial vehicles. The purpose of this letter is to express RMA's concern with two policy statements in the UCP platform document. These statements are:

1. Reclassify service rigs as off-road vehicles, such as farm equipment
2. Replace rural road permits with an annual provincial permit

While agricultural industries such as intensive livestock operations are a concern for road maintenance, many agricultural operations are seasonal in nature, operating within a relatively small geographic area. Coupled with the historical nature of Alberta farming operations as small businesses, the exemptions provided for farm equipment in the various regulations under the *Traffic Safety Act* are reasonable and generally accepted by municipal road managers. However, service rigs are capable of operating nearly year-round, creating strain on municipal infrastructure. Additionally, service rigs are capable of traveling at much higher speeds than farm equipment, are likely heavier, and are not uniform in size and weight (any exemption applied broadly to service rigs will have varying impact based on the size of a particular service rig). In areas of high oil and gas activity, the number of service rigs using municipal roads will likely surpass any type of agricultural equipment. Currently, the maximum allowable weight of service rigs varies seasonally based on ground conditions. Providing exemptions for service rigs under the *Transportation Safety Act* limits the autonomy of municipalities, who best understand local road conditions, and is likely to lead to premature damage to municipal road and bridge infrastructure, which will increase municipal costs and increase the likelihood of damage to service rigs and other industrial equipment travelling such roads.



As the managers of an expansive road network, RMA members are also concerned with the impacts that a centralized provincial permitting system will have on local decision-making. RMA recognizes the need for overweight/dimension commercial vehicles to operate within or travel through rural municipalities. The willingness of municipalities to work with the commercial vehicle operators on this issue is evidenced by the high proportion of municipalities participating in the Transportation Routing and Vehicle Information System (TRAVIS). TRAVIS is a multi-stakeholder project administered by Alberta Transportation to increase the efficiency the overweight/dimension permitting process while respecting local autonomy with respect to road bans.

As municipalities are responsible for the maintenance of local roads, RMA is concerned with a process that would limit the decision-making abilities of local authorities. If the ability to oversee overweight/dimension permits is removed, or exemptions are provided for industrial activity, road degradation will likely increase, and the financial burden for repairs will ultimately be passed on to other tax payers in the municipality. It is important to keep in mind that overweight/dimension permitting is not a revenue-generating activity for municipalities beyond recovering the administrative costs associated with issuing and managing permits. Municipal overweight/dimension vehicle permitting is intended to provide municipalities with the tools to ensure that the roads they manage are used only by the vehicle types they were designed to accommodate, and that large vehicles operate within municipalities with minimal impacts on infrastructure or the safety of the travelling public. With this in mind, it is unclear how the policy commitment will increase jobs in the oil and gas sector, as it is more likely to increase municipal costs and damage infrastructure that industry relies on for access to natural resources.

RMA appreciates the willingness of the Government of Alberta to aggressively pursue the policy changes identified in their platform. However, the changes above will both have significant negative impacts on municipalities and warrant adequate consultation with all stakeholders. The permitting process has been integral for protecting provincial roads and bridges, and those same protections need to be in place for municipal infrastructure. We would encourage you to delay the implementation of the above commitments until all perspectives are considered, and the actual costs and benefits to industry and municipalities are understood. Thank you for your time and consideration of this issue. The RMA is looking forward to your response and the opportunity to discuss these issues further.

Sincerely,

A handwritten signature in black ink, appearing to read "Al Kemmere".

Al Kemmere, President

RESOURCEFUL. RESPONSIVE. RESILIENT.