

**Bylaw 2020-13 Acheson Industrial Area Structure Plan**  
**Written Submissions for Public Hearing**  
*(received prior to November 26, 2020)*

1. **Wagner Natural Area Society, via email, November 10, 2020**

**From:** [REDACTED]  
**To:** [Rachelle Trovato](#)  
**Cc:** [Feinan Long](#); [Joshua Culling](#); [Martin Frigo](#); [Dave Ealey](#)  
**Subject:** Re: NOTICE OF PUBLIC HEARING: Bylaw 2020-13 Acheson Industrial ASP  
**Date:** Tuesday, November 10, 2020 11:19:30 PM  
**Attachments:** [image001.jpg](#)

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Hi Rachelle et al.,  
I've reviewed the hearing package and was pleased to see the incorporation of the numerous points and reservations that we discussed with you. You seem to have dealt with all the points.

I did find a couple errors. On page 13, Map 3 Existing Infrastructure clearly shows 108 Ave as a part of the existing infrastructure from 274 Street. to the west **but the portion of 108th Ave does not exist to the west of range road 264 currently.** That avenue is in the Map for future infrastructure, but does not exist now.  
On page 50, point #12 should read "...release rates not exceeding that of..." not "exceeded"

Our Board members have the copy of the ASP and the hearing notification letter for review. If there are other issues that they wish to make, I will notify you before the deadline.

Cheers,

Dave Ealey, President, Wagner Natural Area Society

2. Alberta Transportation, via email, November 12, 2018

**From:** [Robert Lindsay](#)  
**To:** [Rachelle Trovato](#)  
**Subject:** RE: NOTICE OF PUBLIC HEARING: Bylaw 2020-13 Acheson Industrial ASP  
**Date:** Thursday, November 12, 2020 4:23:28 PM  
**Attachments:** [image002.ipq](#)  
[image003.ipq](#)

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Hi Rachelle,

A minor quibble / comments that might prove helpful. On Page 4 – Introduction – Transportation, you have missed a fifth highway. Highway 44 extends to the south end of the ramp tapers (about 250m south of the centerline of the median of Highway 16) on Township Road 531A.

Alberta Transportation has begun reviewing the draft update and will get back to you ASAP with our comments. Please note that we are substantially short of staff at the moment so contact me if the time our response is taking runs long for your needs.

**Robert Lindsay**  
Development and Planning Technologist  
Construction And Maintenance Division  
Alberta Transportation  
Government of Alberta  
  
[robert.lindsay@gov.ab.ca](mailto:robert.lindsay@gov.ab.ca)

3. Acheson Business Association, via email, November 18, 2020

**From:** [Colin Tooth](#)  
**To:** [Rachelle Trovato](#); [Rob MacMullen](#)  
**Cc:** [Jodi Fulford](#)  
**Subject:** FW: NOTICE OF PUBLIC HEARING: Bylaw 2020-13 Acheson Industrial ASP  
**Date:** Wednesday, November 18, 2020 2:22:12 PM  
**Attachments:** [image001.jpg](#)  
[image002.png](#)  
[image003.png](#)  
[Acheson Industrial Area Structure Plan.pdf](#)  
[Notice of Public Hearing - Bylaw 2020-13 Acheson Industrial ASP.pdf](#)

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Rachelle and Rob:

The Acheson Business Association executive committee has reviewed the proposed ASP and wishes Parkland County success going forward. We reviewed the draft ASP with you back in October Rachelle, and the content didn't change much from what we could see. Thank you for your work on this.

Best regards,

Colin

Acheson Business Association Vice Chair

4. Wagner Natural Area Society, via email, November 26, 2020

**From:** [REDACTED]  
**To:** [Rachel Trovato](#)  
**Cc:** [Feinan Long](#); [Martin Frigo](#)  
**Subject:** Re: NOTICE OF PUBLIC HEARING: Bylaw 2020-13 Acheson Industrial ASP  
**Date:** Thursday, November 26, 2020 12:12:45 AM

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Hello Rachel et al.,

Based on additional comments from the Wagner Natural Area Society board, I am forwarding the following points about the Acheson ASP, on the record.

We have spent some time reviewing the 2014 Acheson ASP and comparing it with the proposed 2020 Plan. Most of our review has focused on a comparison of Objectives and Policies for the 2014 Plan and Development Concept for the 2020 Plan. Section 6.6 of the 2014 Plan refers to Environment and its counterpart in the 2020 Plan is Section 3.1 (pages 49 – 51). Similarly Objectives and Policies for Agriculture (specifically Agricultural Area A) are contained in Section 6.9 of the 2014 Plan and their counterpart in the 2020 Plan is on pages 41 and 42.

As noted on page 3 of the 2020 Plan, "shall" is directive; "should" is preferred, but not mandatory, and "may" is permissive implying choice. In reviewing the 2020 Plan, we have noted instances where the WNAS prefers stronger wording to protect the Natural Area.

With reference to Agricultural Area A (pages 41-42)

P.41 #4 "may" require studies to be completed...We recommend "shall" or "should"

P.42 #8 again contains the word "may" and is the policy we most strongly suggest should be replaced by "shall". The County is to be commended on adding "recharge zone" to Policy 6.9.5.2.

With reference to S 3.1 Environment (pages 49-51)

As a general comment the County has retained "shall" in most cases and we feel the protection for WNA is stronger in this section than presented in the treatment of Agricultural Area A.

#8 extends the wildlife corridor from Spruce Grove to WNA to Big Lake which is better (replaces 6.9.5.7).

#16 the County "may" complete a wetland strategy. We recommend "shall" or "should"

#17 which replaces 6.6.2.15 is now qualified by "high value".

#23 "may be required" whereas before it was "require." We think this is an important one that Assessments "shall" be required...near or within ESAs and in the Wagner

Recharge Zone.

#24 is weaker and did have a specific 0.8 km setback from WNA (6.6.2.18) – now an assessment “may” be required. We recommend “shall” or “should”.

#25 similarly “require” (6.6.2.19) has been replaced with “may require” in terms of setback from Morgan Creek. This is a weakening of protections for an important watercourse that runs through the natural area.

We think it important that the County remembers that a requirement of the provincial Water for Life and Alberta’s Strategy for Sustainability, as referenced in the Edmonton Metropolitan Region Growth Plan (p. 44), which guides plans, including Area Structure Plans to: d. conserve wetlands with sufficient buffers to maintain their water quality and *hydraulic function*... It is particularly the hydraulic function of WNA that concerns us as it is not enough to protect the Natural Area but to protect “function” requires management of land uses in the recharge zone.

We are encouraged in reading the Plan that there appeared to be otherwise a good understanding of the need for functionality of the WNA wetland in how the plan was prepared.

Regards,

Dave Ealey, President, Wagner Natural Area Society



## 5. City of Spruce Grove, via email, November 25, 2020

From: [Pankaj Nalavde](mailto:Pankaj.Nalavde@parklandcounty.com)  
 To: [Rachelle Trovato](mailto:Rachelle.Trovato@parklandcounty.com)  
 Cc: [Feinan Long](mailto:Feinan.Long@parklandcounty.com); [Joshua Culling](mailto:Joshua.Culling@parklandcounty.com); [Martin Frigo](mailto:Martin.Frigo@parklandcounty.com); [Sue Armstrong](mailto:Sue.Armstrong@parklandcounty.com); [Mark Pursho](mailto:Mark.Pursho@parklandcounty.com)  
 Subject: Re: Comments, Notice of Acheson ASP Virtual Open House  
 Date: Wednesday, November 25, 2020 4:52:46 PM  
 Attachments: [image007.png](#)  
[image002.jpg](#)  
[image011.png](#)  
[image013.jpg](#)  
[image014.jpg](#)  
[image015.jpg](#)  
[image016.jpg](#)

Good Afternoon Rachelle,

Thank you for the opportunity to comment on Bylaw 2020-13 Acheson Industrial Area Structure Plan (ASP) ahead of the Public Hearing.

The following comments pertain to Section 2.7 Special Study Areas – Agricultural Area A and Agricultural Area B. The policies for both of the special study areas contemplate future planning initiatives to explore compatible land uses, which may include non-agricultural uses.

During the draft ASP consultation, we commented on the need for market demand studies to validate the need for the conversion of agricultural lands to non-agricultural uses, which is based on the regional planning policies affecting agricultural lands under the current EMRGP:

**Edmonton Metropolitan Region Growth Plan, 2017** (page 79)

*"Policy 6.2.4 In the metropolitan area, the fragmentation and conversion of prime agricultural lands for nonagricultural uses will only be considered when the proposed development meets all of the following criteria:*

*b. the lands are required to accommodate municipal employment and population projections in accordance with Schedule 1."*

City of Spruce Grove does not support premature conversion of agricultural lands to non-agricultural land uses consistent with the regional planning framework. The ASP is currently silent on any references to market demand studies, whereas your correspondence (see highlights below), suggested that the ASP policies would be making references to this matter, as part of the studies and other requirements to consider the transition of agricultural lands to non-agricultural uses. Kindly provide clarity for me on this issue.

Please contact me if you have any questions.

Sincerely,

**Pankaj Nalavde, RPP, MCIP**

Senior Planner | Planning & Development | City of Spruce Grove

**NOTICE:** The Planning and Engineering office located at 414 King Street is temporarily closed to walk in traffic in response to Covid-19. We can assist you by phone (780-962-7582 main office) or email ([permits@sprucegrove.org](mailto:permits@sprucegrove.org)) at this time.

From: Rachelle Trovato [mailto:[Rachelle.Trovato@parklandcounty.com](mailto:Rachelle.Trovato@parklandcounty.com)]

Sent: November 10, 2020 5:23 PM

Cc: Feinan Long ; Joshua Culling ; Martin Frigo

Subject: NOTICE OF PUBLIC HEARING: Bylaw 2020-13 Acheson Industrial ASP

Good afternoon,

Please see attached for a formal notice of public hearing for Bylaw 2020-13 Acheson Industrial Area Structure Plan for your review and comment. For reference, the draft ASP (presented today for first reading) has been attached to this email.


For more information on the project, see <https://www.parklandcounty.com/en/country-office/acheson-asp.aspx>

We would advise that any comments you or your organization wish to make respecting Phase 1 of the Acheson Industrial ASP be forwarded to the contact outlined in the attached notice by November 26, 2020.

Thank you,

**Rachelle Trovato, RPP, MCIP, MPlan** | Development Planner II | Parkland County | 53109A HWY 779, Parkland County, Alberta T7Z 1R1

Office: 780-968-8443 ext. 8321 | [rachelle.trovato@parklandcounty.com](mailto:rachelle.trovato@parklandcounty.com) | [www.parklandcounty.com](http://www.parklandcounty.com)

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: Feinan Long [mailto:[Feinan.Long@parklandcounty.com](mailto:Feinan.Long@parklandcounty.com)]

Sent: October 23, 2020 2:53 PM

To: Pankaj Nalavde

Subject: RE: Notice of Acheson ASP Virtual Open House

Hi Pankaj,

I just wanted to update the City on the progress of the Acheson ASP. We have duly noted your points, and reviewed the ASP policies to ensure that they reflected those considerations.

In particular, new definitions around "Developed / Imminent Development", "Near Term Development" and "Long Term Development" were added to the Glossary of the ASP.

**Developed / Imminent Development** means lands that have already been developed or will be in an immediate future, typically referring to the next several years.

**Near Term Development** means lands that will likely be developed within a typical span of 5 to 10 years.

**Long Term Development** means lands that may be developed in approximately 10 years or more.



Regarding the Ag Area A future land use: this will be determined at a future date in consultation with key stakeholders, including City of Spruce Grove and Wagner Natural Area Society. Any future conversion of these lands will be based on detailed environmental and market studies, and extensive consultation with neighbours. This is supported by the policies found in this ASP.

**Next Steps:**

The draft ASP will go to Council on Nov 10, 2020 for First Reading.

Tentative Public Hearing is on Dec 8. We will re-circulate the draft ASP at least 3 weeks prior to this date to City of Spruce Grove.

Thank you for your input and hope you have a great weekend.

**Feinan Long, MScPl.** | Planner, Long Range Planning | Parkland County | 53109A HWY 779, Parkland County, Alberta T7Z 1R1

Office: 780-968-8888 ext. 8381 | Fax: 780 968 8444 | [feinan.long@parklandcounty.com](mailto:feinan.long@parklandcounty.com) | [www.parklandcounty.com](http://www.parklandcounty.com)

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From: Pankaj Nalavde <[REDACTED]>

Sent: Thursday, October 01, 2020 10:02 AM

To: Feinan Long <[Feinan.Long@parklandcounty.com](mailto:Feinan.Long@parklandcounty.com)>

Cc: Sue Armstrong <[REDACTED]>; Mark Pucsko <[REDACTED]>; David Towle <[REDACTED]>

<[REDACTED]>

Subject: Re: Notice of Acheson ASP Virtual Open House

Good Morning Feinan,

Thank you providing the clarification so promptly, we do not have any additional comments on the Draft ASP at this point.

I briefly wanted to summarize the key points raised through our comments, which are:

- Need for better definition around long term development timelines;
- Basing future redesignation of agricultural lands to non-ag uses on the basis of market needs.
- City would generally not support premature conversion of agricultural lands to non-ag uses.
- Maintaining opportunities for collaboration and joint planning between the City and the County pertaining to Special Area A.

The Planning staff sincerely appreciate the referral and the opportunity to provide comments on the ASP and we look forward to working with the County on Phase 2 of this project.

Please contact me if you have any questions.

Sincerley

**Pankaj Nalavde, RPP, MCIP**

Senior Planner | Planning & Development | City of Spruce Grove

[REDACTED]

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From: Feinan Long [<mailto:Feinan.Long@parklandcounty.com>]

Sent: September 28, 2020 3:57 PM

To: Sue Armstrong <[REDACTED]>

Cc: Martin Frigo <[Martin.Frigo@parklandcounty.com](mailto:Martin.Frigo@parklandcounty.com)>; Pankaj Nalavde <[REDACTED]>; Rachelle Trovato <[Rachelle.Trovato@parklandcounty.com](mailto:Rachelle.Trovato@parklandcounty.com)>

<[Rachelle.Trovato@parklandcounty.com](mailto:Rachelle.Trovato@parklandcounty.com)>

Subject: RE: Notice of Acheson ASP Virtual Open House

Hi Sue,

Thank you and your team for reviewing the ASP and getting back to us. Please see our response in red below:


1. Did Parkland County complete a growth study or needs assessment for Acheson? – Not as part of Phase 1 (2020), which is an administrative update to “refresh” the outdated ASP. As part of Phase 2 (starting in 2021) of this project, we will be looking to re-designate future land use concept in the “Special Study Area - Agricultural Area B” lands (southeast area of Acheson), which will be based on a market “needs” or feasibility study. The County does have an overall Technical Growth Study completed in 2016, which determined that Acheson Industrial Area has sufficient land supply to accommodate growth for the next 30 years (until 2046).
2. I see that there is a proposal to expand commercial/light industrial along the south side of Hwy 16A but a lot of Acheson has not built out – is there enough land for 20 years, 50 years without premature conversion? I am just wondering what the growth picture is like. – See above response. This ASP update (Phase 1 and 2) does not include expanding the ASP boundary. If you compare the two Future Land Use Concept maps (attached Maps 6), one from 2014 and one newly drafted, the future land uses remain very much the same. No land use re-designation has been done as part of Phase 1.
3. If there wasn’t a needs assessment done/growth study, what is the rationale for the expansion? – The Acheson ASP (2014) specified a review and update every five (5) years. Also there is currently a need to re-designate lands within the Special Study Area B in the near future, as Acheson has seen steady growth within its boundaries. This is being done as part of Phase 2.
4. Also, some definitions around imminent/near term/long term development will be helpful or at least criteria on when expansion may be considered. – Thank you, we will take this into consideration. Previously the ASP had defined “imminent/near term/long term” phrases with specificity (i.e. 5 years, 10 years, etc.) but we found that being so specific did not work at the ASP level; as in, it did not take into consideration market trends. But it may be an option for us to frame them in another way.
5. The proposed constrained/limited development land areas – what will the underlying land use be? Agriculture? – These lands must comply with the existing underlying Land Use Bylaw districts, which are typically Agricultural Restricted, Agricultural General (in Special Study Area A) and Industrial Reserve Districts. If it helps, I have attached the existing Land Use District Map (Map 2).

We really do appreciate your time and consideration related to reviewing the ASP. Rachelle, Martin and I would be happy to jump on a call with you this week if you would like further clarifications or have other questions.



Thank you,

**Feinan Long, MScPl.** | Planner, Long Range Planning | Parkland County | 53109A HWY 779, Parkland County, Alberta T7Z 1R1  
Office: 780-968-8888 ext. 8381 | Fax: 780 968 8444 | [feinan.long@parklandcounty.com](mailto:feinan.long@parklandcounty.com) | [www.parklandcounty.com](http://www.parklandcounty.com)

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From: Sue Armstrong <[REDACTED]>

Sent: Monday, September 28, 2020 12:47 PM

To: Feinan Long <[Feinan.Long@parklandcounty.com](mailto:Feinan.Long@parklandcounty.com)>

Cc: Martin Frigo <[Martin.Frigo@parklandcounty.com](mailto:Martin.Frigo@parklandcounty.com)>; Pankaj Nalavde <[REDACTED]>

Subject: FW: Notice of Acheson ASP Virtual Open House

Hi Feinan:

Spruce Grove Planning staff are reviewing the draft ASP and I have a couple of quick (hopefully) questions that will help in our review. We will try to get something back to you for October 1<sup>st</sup> but it will be helpful to get your responses to our questions in order to provide an accurate response.

Did Parkland County complete a growth study or needs assessment for Acheson? I see that there is a proposal to expand commercial/light industrial along the south side of Hwy 16A but a lot of Acheson has not built out – is there enough land for 20 years, 50 years without premature conversion? I am just wondering what the growth picture is like. If there wasn't a needs assessment done/growth study, what is the rationale for the expansion? Also, some definitions around imminent/near term/long term development will be helpful or at least criteria on when expansion may be considered.

Granted I have just done a very quick overview so far so I might have missed the info, but help me understand the proposed constrained/limited development land areas – what will the underlying land use be? Agriculture? (I personally know why the lands have constraints but I'm not sure if your readers will know).

Thanks much!

Sue

From: Feinan Long [<mailto:Feinan.Long@parklandcounty.com>]

Sent: September 24, 2020 10:40 AM

To: Pankaj Nalavde <[REDACTED]>

Cc: Rachelle Trovato <[Rachelle.Trovato@parklandcounty.com](mailto:Rachelle.Trovato@parklandcounty.com)>

Subject: RE: Notice of Acheson ASP Virtual Open House

Hi Pankaj,


Former Policy 6.9.5.7 was moved to 3.1 Environment section in the updated ASP (Page 48, policy 8); and Former policy 6.9.5.8 was moved to 3.2 Parks, Open Space and Rec section in the updated ASP (page 52, policy 10).

There were many policies that were moved to what we deemed to be more appropriate sections within the ASP, but we did try to keep all of them intact (except for minor grammatical rewording etc). If you see any more policies possibly moved, please feel free to ask!

Thank you,

**Feinan Long, MScPl.** | Planner, Long Range Planning | Parkland County | 53109A HWY 779, Parkland County, Alberta T7Z 1R1

Office: 780-968-8888 ext. 8381 | Fax: 780 968 8444 | [feinan.long@parklandcounty.com](mailto:feinan.long@parklandcounty.com) | [www.parklandcounty.com](http://www.parklandcounty.com)

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From: Pankaj Nalavde <[REDACTED]>

Sent: Thursday, September 24, 2020 9:44 AM

To: Feinan Long <[Feinan.Long@parklandcounty.com](mailto:Feinan.Long@parklandcounty.com)>

Subject: RE: Notice of Acheson ASP Virtual Open House

Good Morning Feinan,

As I was reviewing the updated ASP and specifically policies for the Special Study Area - Agricultural Area A, I noticed the current ASP has a couple of policies pertaining to conservation of wildlife corridor and potential non-motorized recreation trail near the Wagner Natural Area:

*"6.9.5.7. Respect the potential wildlife corridor that connects the City of Spruce Grove to the Wagner Natural Area. The County will work with the City of Spruce Grove and landowners to conserve the natural areas that currently exist along this corridor.*

*6.9.5.8. Consider the development of a non-motorized recreational trail adjacent to the wildlife corridor between the City of Spruce Grove and Wagner Natural Area. The development of recreational trails is contingent upon timing of joint planning initiatives with the City of Spruce Grove and on extensive consultation with County landowners."*

Can you confirm if these policies are being dropped or integrated in a different section of the ASP?

Sincerely

Pankaj Nalavde, RPP, MCIP

Senior Planner | Planning & Development | City of Spruce Grove

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