

September 7, 2017

Linda Sahli, City Clerk  
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And

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Delivered by e-mail

**RE: LDA17-0136**

**Land Development Application for ASP, Text Amendment (Edmonton Energy and Technology Park)**

This letter is in response to correspondence from Peter Ohm to Peter Tarnawsky dated August 24, 2017, and based on additional clarification provided by Laurie Moulton from the City of Edmonton through September 6, 2017.

Sturgeon County acknowledges and appreciates efforts by the City of Edmonton to work proactively to resolve unresolved issues regarding amendments to the Edmonton Energy and Technology Park (EETP) ASP. Since our July 5, 2017 letter, submitted as part of your Public Hearing process, we have gained better clarity regarding planning processes associated with the future implementation of the EETP ASP.

### **Concerns with EETP ASP**

Sturgeon County remains concerned about the lack of certainty the EETP ASP provides regarding the scale or intensity of development that could develop, via the proposed Medium Industrial Land Use Precinct, adjacent to existing residents and businesses in Sturgeon County. Despite the clarity provided, Sturgeon still has no means to predict or evaluate the full local or regional impact of future Medium Industrial developments along our shared boundary. Upon review of the proposed ASP amendments, Edmonton's Intermunicipal Planning Referrals & Notification (MDP Schedule A), and the ASP's sub area planning provisions, it seems there is little to no opportunity for future input to comment on mitigating any potential impacts of future Medium Industrial development.

## 1. Planning Process – Insufficient Means for Intermunicipal Input

Section 11.2 (Technical Report Requirements) of the EETP ASP acknowledges that *“approval of the EETP ASP is only the first step in the development of the plan area. It provides the vision and initial development parameters to initiate subsequent steps in the planning process.”* It goes on to describe a new process for the review of zoning applications that will follow a sub area planning process supported through the coordination of a supporting Technical Report. The EETP ASP states that *“This Technical Report may include the following components as they pertain to the entire sub-area: sub-area specific Risk Assessment, Transportation Assessment, Natural Area Management Plan, Communal piping alignments, Railway spur alignments.”*

We cite this portion of the EETP ASP to reinforce the point that significant sub-regional planning is noted as being incomplete within the current ASP, being deferred to future ‘sub area’ planning processes which do not provide Sturgeon County the opportunity for comment.

For instance, Transportation Assessments, required as part of future sub-area planning, will likely contemplate functional impacts to lands located in Sturgeon County. However, with this assessment occurring as part of a sub-area planning process, our municipality will have no means to provide input regarding road impacts associated with future rezoning or development proposals deemed ‘Medium Industrial’.

Sturgeon County continues to see opportunities for increased intermunicipal collaboration and notification through Section 11.2 ‘Technical Report Sub-Areas’. Prior to the approval of the zoning change, the Technical Report must be provided to the satisfaction of City of Edmonton Administration. The County maintains the position that an intermunicipal referral should occur with Sturgeon County Administration for plan sub-area H, I, O and Q, as part of the EETP ASP implementation process.

## 2. Referral Process – No Certainty for Future Input

Sturgeon County acknowledges that the City of Edmonton *“will endeavor to provide Advance Notification (postcard) for all rezoning application in the Edmonton Energy and Technology Park within 1.6km of Sturgeon County.”*

We suggest that this intent be revised to read *“shall provide Advance Notification ...”* to ensure certain and consistent referral on all rezoning applications. We understand this to be a ‘courtesy’ referral, and not part of a formal intermunicipal referral process. Therefore, there will be no guarantee that comments from Sturgeon County will be formally considered.

## 3. Employment Projections – Defer to Regional Discussions

Sturgeon County acknowledges the aspirational employment and full build out projections provided in response, and recognize that this will be part of ongoing regional discussions through the Capital Region Board. We thank you for the additional clarity.

#### 4. Pipeline Systems Planning – Defer to Provincial Jurisdiction and Regional Discussions

Sturgeon County acknowledges and appreciates that the City of Edmonton is committed to future pipeline planning occurring between both municipalities. We also note that future discussions will occur through the Capital Region Board, and shall recognize the input and direction of the Alberta Energy Regulator. We thank you for the additional clarity.

In closing, we note that the EETP ASP is the City of Edmonton's largest Area Structure Plan. As such, Sturgeon County continues to maintain that due to the vagueness and scale of this plan, there are many questions left unanswered regarding the future intensity, scale, and impact of Medium Industrial development within the defined 1.6km intermunicipal fringe. We acknowledge that the ASP will require additional planning in the future to assess these impacts, however the process will not enable our municipality to provide input regarding the integration and mitigation of future impacts. We ask the City of Edmonton to consider our request to accommodate future input by Sturgeon County into the planning of sub areas H, I, O and Q, as part of the EETP ASP implementation process.

Thank you for your consideration regarding our comments.

Sincerely,



Collin Steffes  
Sturgeon County, Manager Community & Regional Planning

Cc:

Sturgeon County Council

Stephane Labonne, Sturgeon County, General Manager Integrated Growth

Peter Tarnawsky, Sturgeon County, Chief Administrative Officer

Linda Cochrane, City of Edmonton, City Manager

Gary Klassen, City of Edmonton, Deputy City Manager, Regional and Economic Development

Paul Ross, City of Edmonton, Branch Manager, Economic and Environmental Sustainability