BYLAW 1199/09

ADOPTION OF RIVERSIDE SPRINGS AREA STRUCTURE PLAN

STURGEON COUNTY, MORINVILLE, ALBERTA

BYLAW 1199/07 BEING A BYLAW OF STURGEON COUNTY, MORINVILLE, ALBERTA FOR THE PURPOSE OF ADOPTING THE RIVERSIDE SPRINGS AREA STRUCTURE PLAN.

WHEREAS, the Municipal Government Act, R.S.A. 2000 C.M-26, and amendments thereto authorize Council to establish and amend Area Structure Plans.

AND WHEREAS, the proposed amendments were advertised in the January 20th and 27th, 2010 editions of the Free Press newspapers and circulated to adjacent landowners in the area of the subject lands.

AND WHEREAS, a Public Hearing was held at 7:00 pm, Tuesday February 9, 2010 in the Community Hall, Gibbons, Alberta.

AND WHEREAS, the Council of Sturgeon has deemed it desirable to adopt the Riverside Springs Area Structure Plan.

NOW THEREFORE BE IT RESOLVED, that the Council of Sturgeon County, hereby enacts the bylaw is adopted as follows:

- 1. That Council adopt the Riverside Springs Area Structure Plan for the lands shown on Schedule "A" and attached as Schedule "B".
- 2. That the Municipal Development Plan Bylaw 818/96 Future Land Use Map be amended to reflect the boundaries of the Riverside Springs Area Structure Plan as shown on Schedule "A".

That this Bylaw shall come into force and take effect upon the date of third reading and signing in accordance with Section 213 of the Municipal Government Act, R.S.A. 2000 C.M-26, and amendments thereto.

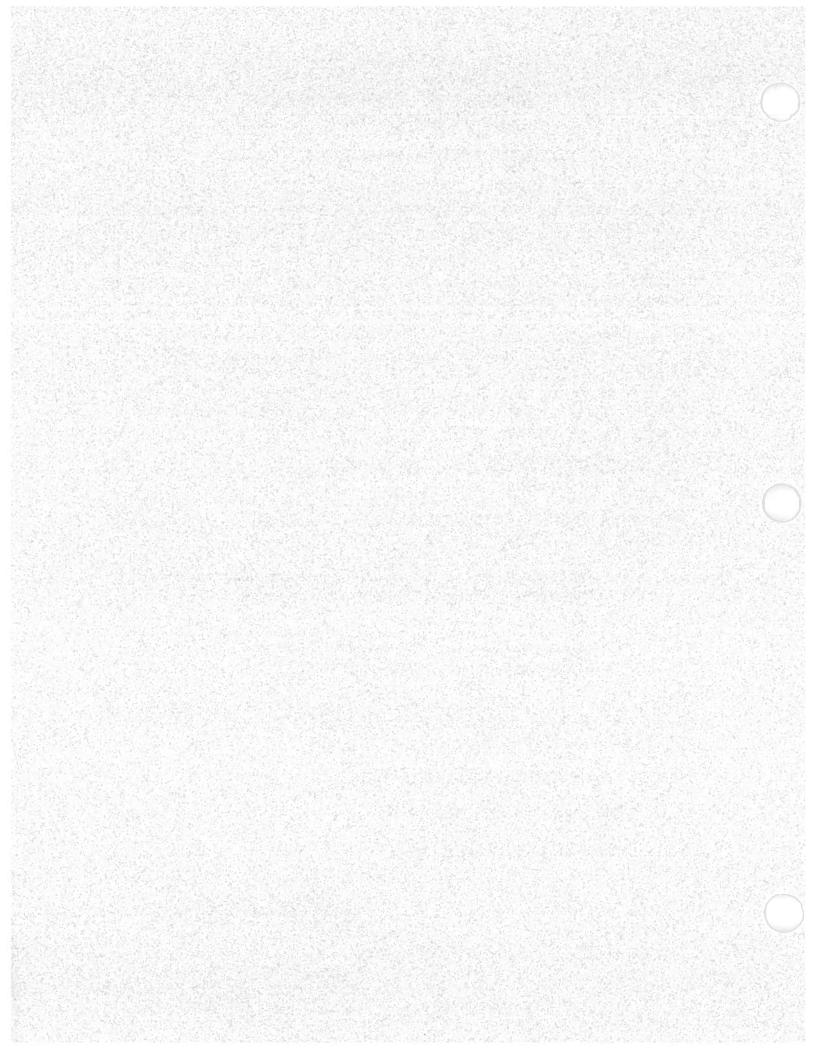
Read a first time this 10th day of November 2009.

Read a second time this 30th day of March 2010.

Read a third time this 30th day of March 2010.

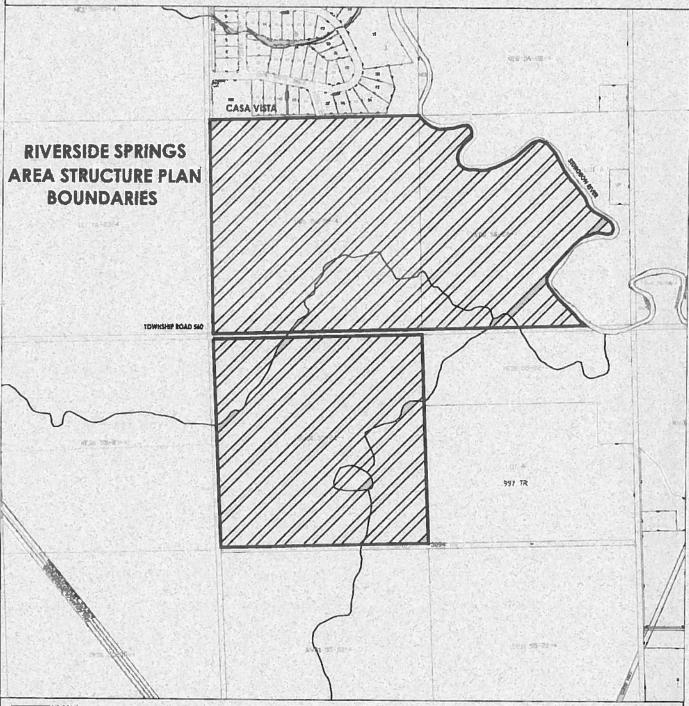
MAYOR

COUNTY COMMISSIONER





RIVERSIDE SPRINGS AREA STRUCTURE PLAN ADOPTING BYLAW 1199/09

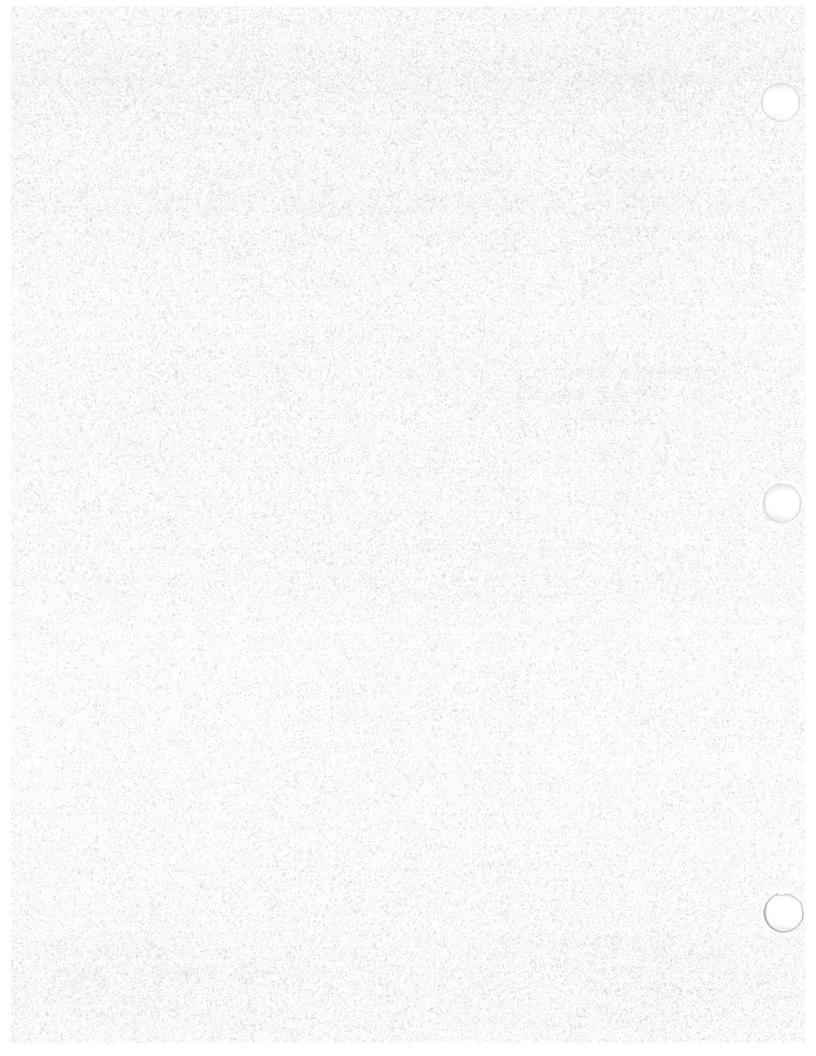


SUBJECT LANDS

SCALE: NTS

SCHEDULE A OCTOBER 29, 2009

CREATED BY: KH



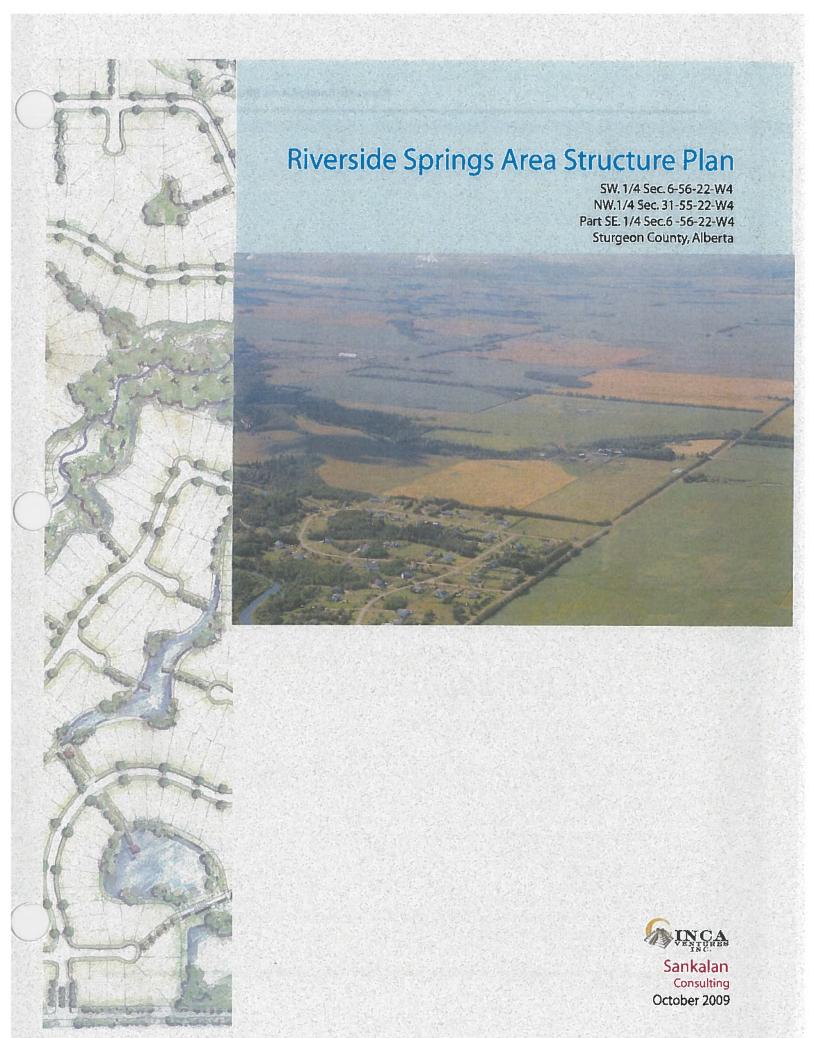


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1. Introduction

1.1. Vision

The rural municipality of Sturgeon County is undergoing a steady population growth in recent years. The proximity to the City of Edmonton and the City of St. Albert makes it a perfect choice for population that need housing in the proximity of urban centres and still prefers a rural lifestyle. Alberta's Industrial heartland also known as the 'up grader alley' is located within the Sturgeon County. The Alberta's Industrial Heartland is set to build eight new bitumen up-graders and refinery plants including 2 projects in the Sturgeon County such as the North West Upgrading and the Fort Hills project. With billions of dollars of planned investment in the area, there will be a steady demand for residential developments in the coming years. Multi-lot residential development is an important sector in the local land use of the Sturgeon County and will continue to grow in coming years to satisfy the needs of the farming communities and future population.

Inca Ventures Inc., an Edmonton based land development company, is planning to develop a multi-lot residential development in the east central part of the Sturgeon County that is sustainable and well integrated with the surrounding natural features and land uses.

1.2. Purpose

The main objective of this Area Structure Plan is to develop a comprehensive vision and development framework for the portion of land legally described as 'Northwest Quarter Section 31, Township 55, Range 22, West of the Fourth Meridian and a portion of the South Half of Section 06, Township 56, Range 22, west of the Fourth Meridian, Sturgeon Country, Alberta as identified in Map 1.

The purpose of this document is to:

- Establish future land use framework for subject area
- Provide direction for implementation of transportation, water, storm water, sanitary and other services.
- Provide a flexible development framework that allows for response to changing market demands over time.
- Encourage use of cluster subdivision or conservation subdivision principles

1.3. Definition of the Plan area

The plan area is located on NW. 1/4 Sec. 31 - 55 - 22 - W4, SW. 1/4 Sec. 6 - 56 - 22 - W4, Part SE. 1/4 Sec. 6 - 56 - 22 - W4 in the east central part of the Sturgeon County and encompasses approximately 175 hectares (400 acres) of land west of the sturgeon river.

1.4. Land ownership

The current land ownership of the plan area is as follows: Refer Map 2.

Table 1. Land ownership

Legal description	Owner	Area
NW. 1/4 Sec. 31 - 55 - 22 - W4	J and D Thimer	
SW. 1/4 Sec. 6 - 56 - 22 - W4	J and D Thimer	
Part SE. 1/4 Sec. 6 - 56 - 22 - W4	J and D Thimer	
Total Area		175.8 Hectares

2. Statutory plans and policy context

2.1. Sturgeon County Municipal Development Plan Bylaw 818/96

The Sturgeon County Municipal Development Plan (the MDP) identifies SW. 1/4 Sec. 6-56-22-W4 and Part SE. 1/4 Sec. 6-56-22-W4 portions in the plan area as Environmental Protection and NW. 1/4 Sec. 31-55-22-W4 portion as Agricultural. Therefore, the Municipal Development Plan land use map needs to be amended to designate the subject land as country residential to allow for the proposed development.

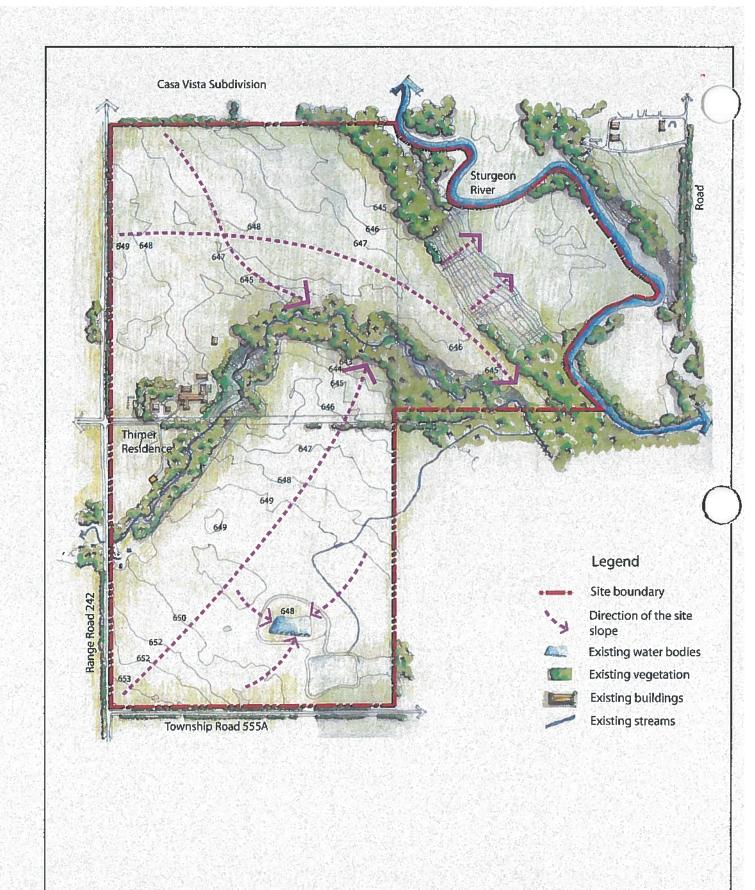
Section 3.0 of the Sturgeon County MDP recognises that the multi-lot residential development is an important sector of the local land use and social pattern. In addition, the MDP suggests that it is most appropriate that such land use should be concentrated in existing locations rather than spread throughout the county. Section 3.2 of the MDP establishes further criteria that multi-lot country residential will be permitted if they are located adjacent to the boundary of an existing multi-lot country residential subdivision or are not located on better agricultural lands. The subject land is located immediately south of Casa Vista multi-lot residential subdivision. As per the geotechnical study, the majority of the subject land contains Class 1 soils. Although Class 1 soils are considered to have moderately high to high productivity for variety of crops, the presence of small rocks throughout the subject land makes it less favourable for continued agricultural production. (per. Comm., Jim Thimer) Section 11.0 of the MDP establishes the development criteria if multi-lot residential development is proposed within the Environmental Protection area. Thus, the proposed Area Structure Plan for the Riverside Springs multi-lot residential subdivision is consistent with the policies established in the Sturgeon County Municipal Development Plan. The proposed Riverside Springs Area Structure Plan requires an amendment to the Future Land Use Map to re-designate SW. 1/4 Sec. 6 - 56 - 22 - W4 and Part SE. 1/4 Sec. 6 - 56 - 22 - W4 portion of land from 'Environmental Protection' to 'Country Residential' and NW. 1/4 Sec. 31 - 55 -22 - W4 portion of land from 'Agriculture' to 'Country Residential'.

2.2. Adjacent Area Structure Plans

A multi-lot country residential subdivision called 'Casa Vista', established in 1978, is located immediately north of the subject lands. In 2007, an Area Structure Plan was proposed for the SE ½ 12-56-23-W4 (Sierra Ridge) located North West of the subject land. This Area Structure Plan for Sierra Ridge multi-lot residential development has received second reading from Sturgeon County Council at the time of writing this report. The Sierra Ridge ASP proposes 35 half acre lots in phase 1 and 140 half acre lots in phase 2 and 3. The total population of 586 is anticipated over 5 to 10 years of development horizon.

2.3. Sturgeon County Land use bylaw

The approval of the Sturgeon County Land Use Bylaw will be necessary to redistrict the subject lands from Agricultural – Nature Conservation (A-NC) to Country Residential – Estate (CR-E) and Agricultural (AG) to Country Residential – Estate (CR-E). In addition, portion of the lands will be dedicated as Environmental Reserve (ER) and Municipal Reserve (MR). The use of smaller lot sizes for Country Residential – Estate (CR – E) subdivision should be encouraged to incorporate cluster subdivision principles.



Riverside Springs, Area Structure Plan

SW. 1/4 Sec. 6-56-22-W4 NW. 1/4 Sec. 31-55-22-W4 Part SE, 1/4 Sec, 6-56-22-W4 Map 3. **Existing Site Features**







100m August 2009



Riverside Springs, Area Structure Plan SW.1/4 Sec.6-56-22-W4 NW.1/4 Sec.31-55-22-W4 Part SE.1/4 Sec.6-56-22-W4

Map 5. Aerial Photograph Sankalan Urban Planning



August 2009

3.5. Environmental Site Assessment

A Phase 1 – Environmental Site Assessment was conducted by P. Machibroda Engineering Ltd. in April 2008. The purpose of the Phase 1- ESA was to determine the potential existence of contaminants and/ or environmental concerns on the subject property. The phase 1 – ESA consisted of a review of sequential aerial photographs, historical records, Provincial Land Titles, a visual site review, and the file searches conducted by Alberta Energy and Utility Board (EUB), Petroleum Tank Management Association of Canada (PTMMA), Alberta Environment, Capital Health, Environmental Law and Sturgeon County. Although it is not recommended to carry out a phase 2 ESA, the phase 1 ESA states that the following issues cannot be confirmed without further investigation (i.e. phase 2 ESA):

- Impacts associated with releases (if any) from aboveground storage tanks housing diesel fuel and gasoline located at the farmvard site.
- Impacts associated with releases (if any) from natural gas pipelines within SW. 1/4 Sec. 6 – 56 – 22 – W4 and NW. 1/4 Sec. 31 – 55 – 22 – W4. No evidence of release (adverse odours, staining) was apparent during geotechnical investigation.
- Environmental hazard of potentially small amounts (if any) of building products such as lead paint, asbestos, polychlorinated biphenyls (PCBs) and or mercury within the farmyard development.

As per Phase 1 -- Environmental Site Assessment it is recommended that the debris throughout the subject property and soil fill pile containing manure located within SE-06-56-22-W4M near the crest of the river valley slope be disposed as per applicable guidelines and regulations. It is also recommended that the potable water from the site be tested.

3.6. Environmental Impact Assessment

At this stage, an Environmental Impact Assessment is not conducted for the subject site. A separate report will be submitted at the rezoning and the subdivision application stage.

3.7. Heritage/ historical / cultural resources

Inca Ventures has contacted Margaret Ingibergsson of Alberta Community Development for their review with regards to the impact on historical, archaeological or paleontological resources in the ASP area. (Please refer Appendix 2). The preliminary review by Alberta Community Development has revealed that there are no previously recorded historic resource sites. It also revealed that there is a low likelihood of any impact on undisturbed sites within the project area.

At this stage, a Historical Resources Impact Assessment (HRIA) is not recommended for the project area.

3.8. Biophysical Assessment

Biophysical assessment was conducted by AMEC Earth and Environmental in February 2008. The intent of the biophysical assessment was to identify potentially environmentally significant or sensitive features in the study area, identification of lands applicable to environmental and municipal reserves pursuant to the Municipal Development Plan and to provide recommendations to achieve an environmentally sensitive development pattern.

3.10. Transportation Impact Assessment

Background

The Traffic Impact Assessment (TIA) for Inca Ventures Inc. was undertaken by AMEC Earth & Environment in March 2008 and is currently being reviewed by Sturgeon County for approval. During the preparation stage of the TIA, a detailed review of the Sturgeon County Heartland Plan (2007) and various past planning initiatives by the Alberta Transportation in the past decade was undertaken. The Heartland Plan addresses widening improvements of the Highway 28A from twolane undivided Highway to four-lane divided Highway and discusses future interchange location option at the intersection of Highway 28A and Highway 643. In 2007, Alberta Transportation commissioned AMEC Earth & Environment to undertake functional planning of Highway 28A:03. Based on the discussion with staff, the existing intersection of Highway 28A and Twp. Rd. 560 will be affected and a wide range of scenarios are currently being discussed; such as, restricting access, permanently closing, or improving the existing intersection. anticipated that the functional planning study will be completed by the end of 2009. If the study findings recommend closing of the intersection of Highway 28A and Twp. Rd. 560, an access leading to the development will be provided either from east on Highway 28A via Twp Rd 554, north on Highway 643 via RR 231 and from the south on Highway 37 via RR 231.

Regardless of the preferred functional planning study, the Riverside Spring TIA provides important information to make strategic planning decision and should assist the decision making process with regards to the development approval. A detail summary of existing transportation infrastructure around the site is described in the TIA. A summary of the report including recommendations and conclusions are outlined below.

Upon completion, the traffic generated from the Riverside Springs development is estimated to be 2100 vehicles per day. The vehicle distribution and assignment is based primarily on the existing road network and nearest accesses from major Highways.

The study horizons in the TIA are the future years 2013 and 2028. The analysis was performed using Synchro Traffic Simulation software, Intersection Design Software (IDS) and Alberta Geometric Design Guide for these horizon years as well as the existing condition. The TIA considered two alternatives for the 2013. analysis. The first (Alternative 1) is based on 2.5% growth rate and the second (alternative 2) is at 5% growth rate on Highway 28A. In the case of 2028 analysis, three scenarios have been considered to better understand the traffic impact on the road network upon closure of Twp Rd 560. The first scenario involved traffic impact on Highway 28A and Twp. Rd. 560 intersection, assuming no major development occurred until that period. The second scenario was based on closure of Twp. Rd. 560 and reassigning the traffic onto Twp. Rd. 554, RR 230, and RR 231. A third scenario, in which no traffic analysis was performed, construction of an interchange at the location of Highway 28A and Twp, Rd, 554 was assumed.

4. Development concepts

4.1. Development goals

The Riverside Springs Area Structure Plan seeks to establish a sustainable residential community with multi-lot residential – Estate lots in the east central part of the Sturgeon County. The Area Structure Plan seeks a careful integration of proposed development with the surrounding natural and built environment through a series of planning and design initiatives.

4.2. Development objectives

The Riverside Springs Area Structure Plan takes advantage of the unique natural topography of the site, existing natural features, and existing transportation corridors. The main objectives of the ASP are as follows:

Overall objectives

- To develop a plan that is consistent with the general intent of the Sturgeon County Municipal Development Plan.
- To provide a framework for a comprehensively planned community by defining the land uses, access, linkages, and servicing designs.
- To ensure implementation of the ASP on an orderly basis.
- Strive to incorporate cluster subdivision principles.

Residential objectives

- To provide a Residential Estate development with a strong sense of community and which will accommodate approximately 1140 residents by 2018.
- To develop a sustainable community.
- To provide a planned community in a rural setting with the benefits of urban levels of servicing.

School objectives

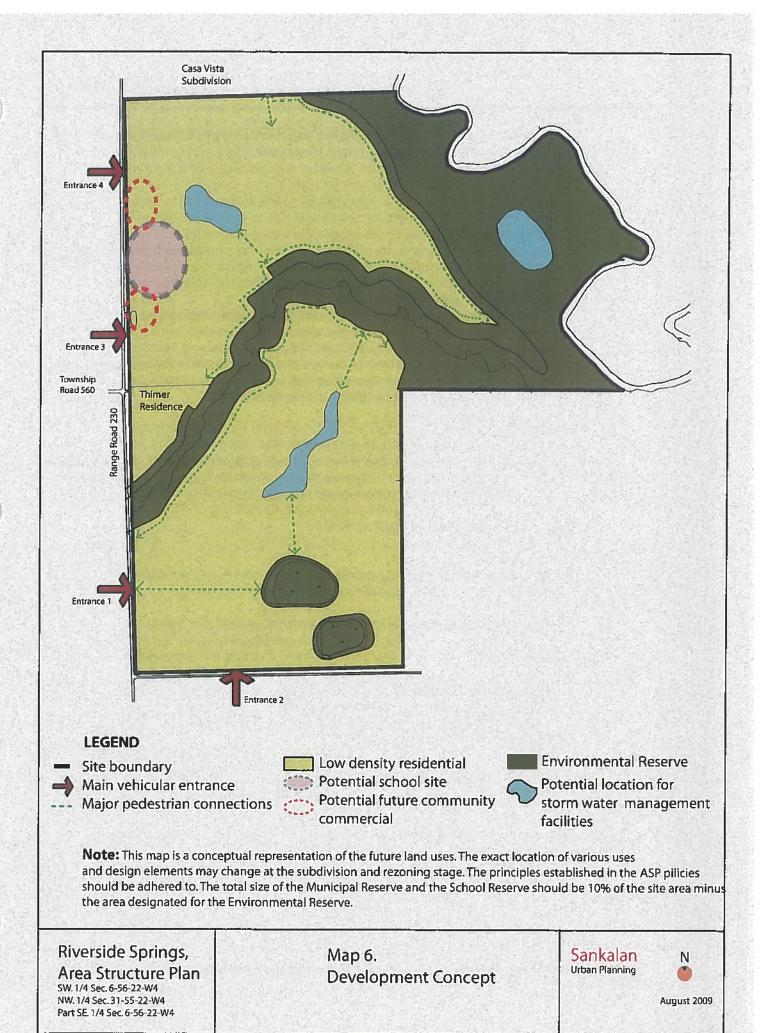
 Make appropriate provisions for future school facilities as suggested by the relevant School Boards

Open space/ park and municipal reserve

- To provide parks and open spaces for the future residents as per Sturgeon County requirements.
- As per the Municipal Government Act, provide 10% of the Plan area as Municipal Reserve and School Reserve in the form of land or money in lieu of land or a combination thereof.
- To ensure retention of tree strands where ever possible.

Transportation objectives

- To provide for safe and convenient access for vehicles and pedestrians.
- To provide all roads to County standards and access to arterial roads in the surrounding the area.
- To provide for future linkages with surrounding residential neighbourhoods and trail connections with the natural areas.



The following table demonstrates anticipated student population at completion of the whole project.

Table 3: Student population projection

	Public	Separate	
Kindergarten – Grade 9	142	64	206
Grade 10-12	35	16	51
	177	80	Total Students: 257

Assumptions:

Total Students 22.6% of total population Public 69% of Students & separate 31% of Students K9 is 80% of Students & Grade 10-12 is 20% of Students

Policies

- 4.4.4.1. It is expected that the school site will be required in the planning area. The developer will provide appropriate school reserve as per Sturgeon School Division Requirements. Interim bussing of students will be necessary.
- 4.4.4.2. Grade 10-12 Students will be bussed to schools in the town of Gibbons and the City of Edmonton.
- 4.4.4.3. The exact size and location of School Reserve and Municipal Reserve will be decided at the Subdivision application stage in consultation with the Sturgeon County Planning Department.

4.4.5. Emergency services

Emergency services will be provided as per the Sturgeon County Standards.

4.4.6. Summary of Land Use Concept

The following is a brief summary of the future land use concept.

Table 4: Land use concept

Land Use	Area	% of Gross Area	
Residential and Roads	+-95 ha	+-54 %	
Environmental Reserve	+-67 ha	+-38%	
Municipal Reserve and School Reserve	+-11 ha	+-6%	
PUL	+-3 ha	+-2%	
Net Area (Gross Area – ER)	+-109.1 ha	+-622%	
Gross Area	175.9 ha	100%	

5.3. Water services

The existing water reservoir and pumping station located within the Casa Vista subdivision and the Sturgeon County supply water line will require upgrading to meet the current storage and distribution standards for the existing subdivision, plus the full build out of the proposed Riverside Springs subdivision and any other approved subdivisions adjacent to the lands, as directed by County Council. Details on staging of any improvements and potential cost sharing would need to be agreed upon in a development agreement prior to any construction taking place.

5.4. Sanitary Services

The Riverside Springs ASP area will connect to a proposed 375mm diameter sanitary gravity trunk line along Range Road 230. One lift station for the entire area to be serviced including Casa Vista, will be required at the low point of the gravity line, north west of the Casa Vista in the SE 12-56-23 W4. The entire Riverside Springs development will drain by gravity and low pressure system for lower elevation lots to the one lift station planned for the area. The lift station, gravity lines and forcemain pipeline would be sized for the full build out of the proposed Riverside Springs subdivision and any other approved subdivisions adjacent to the lands, as directed by County Council. Details including staging and potential cost sharing would need to be agreed upon in a development agreement prior to any construction taking place.

5.5. Storm water servicing

The storm water management proposal must meet at Sturgeon County and Alberta Environment requirements. All weather access to all storm water management facilities will be required. Storm water management facilities are to be located in Public Utility Lots. Any staging of the subdivision development will require proper upstream and downstream storm water management during each phase.

5.6. Shallow Utilities

The shallow utilities such as natural gas, telephone, cable and electricity are available in the area and will be extended as development occurs.

One attendee was curious about feasibility of using solar power.

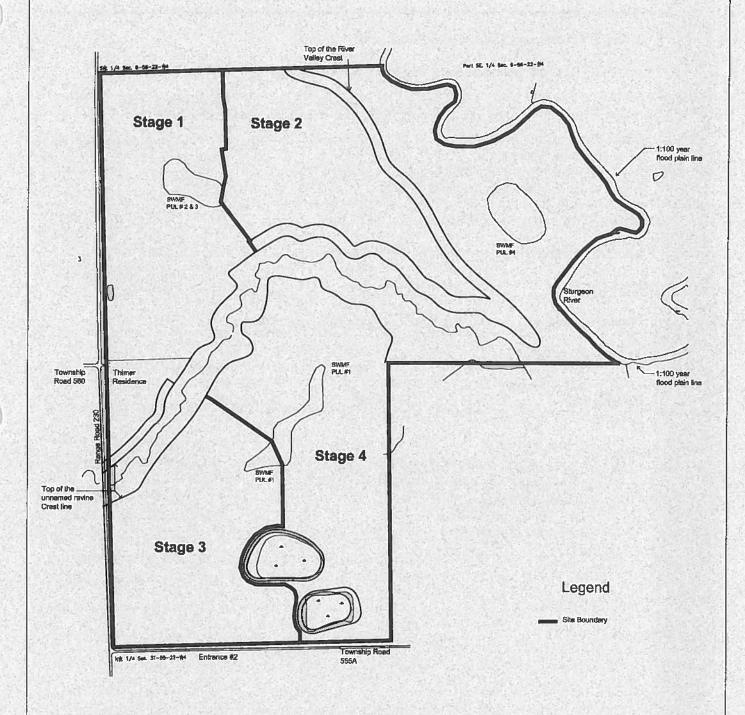
Traffic:

Some attendees were concerned about the impact of the proposed development on the intersection of Highway 28A and Range Road 560.

Services

The planning team explained to the community that the municipal sewer services and improved water services will be provided to the Casa Vista subdivision as a result of the Riverside Springs project. Majority of the attendees welcomed the idea.

Page 20 Sankalan Consulting



Note: This map represents staging concept. Minor variations may be allowed as a response to market conditions.

- The atorm water management facility 1 should be built either partially or completely as part of the stage 3 of the development.
- The atorm water management facility 4 should be built as part of the stage 2 of the development

Riverside Springs, Area Structure Plan

SW. 1/4 Sec. 8-58-22-W4 NW. 1/4 Sec. 31-55-22-W4 Part SE. 1/4 Sec. 8-58-22-W4 Map 7.
Development Staging

Sankalan Urban Planning





August 2009

Table 5: Preliminary Development Statistics

Riverside Springs Estates Area Structure Plan

	Ha (+-)	%	of GDA
Gross Developable Area (GDA)	175.9 ha		
Environmental Reserve	66.8 ha		
Municipal Reserve and School Reserve Storm water management facilities	10.9 ha		
+ Public Utility Lots	3.66 ha		
Roads (Based on width and length)	18.7 ha		
Net Developable area	75.76		
Net Land Uses	ha	Units	Population ¹
Estate Residential ²	75.76	340	1139
Student Population ³			
	Public	Separate	
Kindergarten Grade 9	142	64	
Grade 10-12	35	16	
Total	177	80	

Notes:

- 1. 3.35 persons / unit for Low Density Residential
- 2. Unit total is based upon 1/2 acre lots
- 3. Student generation 22.6 % of total population Public 69% of students

Appendices

Appendix 1: Correspondence with Sturgeon School Division
Appendix 2: Correspondence with Alberta Community Development

Appendix 3: Correspondence with RCMP

Appendix 4: Alberta Transportation comments on TIA and ASP

Approximate Lots:

phase 1 & 2: 164 lots (549 people) ..by 2012 phase 3: 110 lots (368 people) .. by 2015 phase 4: 66 lots (221 people) .. by 2018

Total population: 1139 people Total estimate of children (33%): 375

The County of Sturgeon is looking for a letter which summarizes what you think will be the impact on your division and how this increase of attendance fits within your future growth or population goals,

---- Original Message Follows -----

From: "Dave Johnson" < djohnson@sturgeon.ab.ca>

To: < kim@incagroup.ca > Subject: Riverside Springs

Date: Mon, 7 Jul 2008 12:32:21 -0600

This falls under my authority on behalf of Sturgeon School Division, however I am quite new at this and would be pleased to discuss it with you sometime. Call me at 939-4341 at your convenience.

Kim Carmichael
Operations Coordinator
Inca Ventures Inc.
780. 484. 7744
kim@incagroup.ca

From: "Jerry Zimmer" < jzimmer@gsacrd.ab.ca>

To: kim@incagroup.ca

Cc: "Deb Schlag" < dschlag@gsacrd.ab.ca> Subject: Re: Follow Up Riverside Springs Date: Wed, 02 Jul 2008 11:41:09 -0600

Good morning, Kim.

I have reviewed the location of the proposed development. The development is within the boundaries of Sturgeon School Division and, therefore, will affect primarily Sturgeon's school utilization. Greater St. Albert Catholic Schools boundaries are the City of St. Albert, the Town of Morinville, and Village of Legal. There are also some separate 4X4s contiguous to these communities, but we do not serve the student population in and around the Gibbons area. Even though there is always the option for the minority faith residents of that area to form a separate 4X4 school division which would then be amalgamated with Greater St. Albert Catholic Schools, the potential demographics are not expected to challenge the long term utilization of our Morinville schools.

Hopefully this is useful in your planning, and if you need more specific information, please contact me at your convenience.

Jerry Zimmer

Appendix 2: Correspondence with Alberta Community Development

From: "Margret Ingibergsson" <Margret.Ingibergsson@gov.ab.ca>

To: <kim@incagroup.ca>

Subject: RE: Phasing Plan Attached Date: Fri, 15 Aug 2008 08:51:40 -0600

Thank you for providing the Historic Resources Management Branch with information regarding the proposed Riverside Springs subdivision within the S A% of section 6-56-22-W4M and the NW A% of section 31-55-22-W4M. There are no previously recorded historic resource sites in these sections and as the area appears to be primarily disturbed, there is low likelihood that undisturbed sites will be impacted. Reporting the discovery of historic resources, pursuant to Section 31 of the Historical Resources Act, should any archaeological resources, palaeontological resources and/or historic period sites be encountered during land disturbance activities, the Historic Resources Management Branch must be contacted immediately. It may then be necessary for further instructions regarding the documentation of these resources to be issued. Should you require additional information or have any questions concerning the above, please do not hesitate to contact me. Margret

Margret Ingibergsson Land Use Planner Historic Resources Management Branch Alberta Culture and Community Spirit Old St. Stephen's College, 8820 - 112 StreetEdmonton, Alberta T6G 2P8Phone: (780) 431-2374 / Fax: (780) 422-3106

Email:

margret.ingibergsson@gov.ab.ca

Appendix 4: Alberta Transportation comments on the TIA and ASP

Messrs de Klerk and Tunio

-2-

October 14, 2009

- 5.- Section 3.4iii, Page 8.- The report discusses a third scenario which assumes that Township Road 554 interchange would be constructed. This scenario is the least likely of the three as it is unlikely that interchange construction would occur in a rural area that soon.
- 6.- Section 3.5.1, Table 3-1, Page 9.- Two alternatives are listed. We could not find an explanation describing the two alternatives. Please clarify.
- 7.- Section 5.1 (Intersection Analysis) Page 22.- An intersection analysis is not mentioned for the Highway 37/Range Road 230 intersection or the Highway 643/Range Road 231 intersection as well. This is inconsistent with Page 5 (Section 2.3, Existing Intersection) which advises that both are Type I (agricultural) treatments and then Page 10 (Section 3.5.2) which advises that a Type 4A and Type 3b respectively are warranted. Please include those analyses.
- 8.- Section 5.2.2. Page 26.- At the Highway 643/Range 231 intersection it is noted in this section that required improvements are not included unlike the other three intersections. This is inconsistent with Page 5 (Section 2.3, Existing Intersection) and Page 10 (Section 3.5.2) which advises that a Type 3b is warranted. Please advise.
- 9.- Section 5.4 (signalization) analysis Page 26.- The report needs to advise in which year the warrants will be met and come up with an alternate to not signalizing the intersection. Highway 28A is classified as Freeway facility and a National Highway and as result Alberta Transportation would not allow signals at this location.
- 10.- Section 6.1 (Recommended Road Improvements), Page 27.- For the Highway 28A/RR560 intersection both pre-2028 development and post-2028 development recommendations are given? The recommendation needs to be based on a 20-year pavement cycle. In that regard please clarify the recommendation consistent with the intersection analyses provided. Also please advise which scenarlo (i.e. No. 1, 2, or 3) the recommendation is consistent with. Also please note the Department would support removing the intersection (Scenario 2) versus upgrading (Scenario 1). This climinates throwaway costs at the intersection and eliminates public complaints when the intersection is removed. Also please be aware that future reports may require updating such as revised 20-year planning horizons e.g. 2010-2030.
- 11.- Section 6.1 (Recommended Road Improvements), Page 27.- For the <u>Highway 28A/RR554</u> intersection both pre-2028 development and post-2028 development recommendations are given. The recommendation needs to be based on a 20-year pavement cycle. In that regard please clarify what the recommendation is and also advise which scenario it is consistent with.
- 12.- Section 6.1 (Recommended Road Improvements), Page 27.- Similar comment as above for the Highway 643/Range Road 231 intersection, and the Highway 37/Range Road 230 intersection. If the recommendation is to leave the Highway 37/Range Road 230 intersection as a Type I treatment please include-rational as to why this is acceptable such as the development will not impact this intersection.
- 13.- Section 6.2 (Conclusion), Page 28. The conclusion will need to determine and advise which scenario will be recommended. Typically cost estimates are included at the TIA stage for addressing these matters.

