**Agriculture Land Preservation**

The Government of Alberta has indicated the intention to adopt an “agriculture first” approach and places a restriction on Class 1 and 2 soil based on the Land Suitability Rating System (LSRS). Within the Municipal District of Greenview No. 16, this means a very significant amount of our Agricultural Lands, which are Class 3 soils, are open to development even though they are highly valued in our northern area of Alberta. A one-size fits all approach will not preserve agricultural lands in northern Alberta and the reclassification of Class 3 lands to Class 2 lands due to changing climate conditions has occurred and may be more pronounced in the future. Class 3 lands north of Edmonton provides important relative production on a local and regional level and land intensive applications which remove Class 3 lands from production in our area are as impactful as the removal of Class 1 & 2 Lands in southern areas of Alberta. Between 1948-2016, Canada experienced a 178 Growing-Degree-Day (GDD) increase, with this increase being most dramatic in the north and leading to northern producers successfully planting corn. This has been coupled with a 3-12 day increase in frost free days and daily maximum and minimum temperature increases. With Agricultural Land Preservation being the goal, we ask that you consider that Class 3 soils may be increasingly important for the Agriculture Industry and Alberta moving forward.

**Draft municipal engagement form**

Greenview encourages any methods of enhancing the representation of municipal issues in the engagement process with the Alberta Utilities Commission (AUC). Greenview would like to see improvement on the prior consideration of planning issues locally versus coming at the end of a process which does not allow for local public interests to be at the forefront of issues as basic as site selection. The potential requirement for a municipal concurrence letter or municipal land-use planning approval in advance of the AUC decision would elevate the ability for local government to ensure local interests are reflected as part of the project approval process.

If a local government planning and engagement form was to be provided it should be mandatory and filled out by the Municipality to ensure it is reflective of local concerns and values. This will allow for greater detail on the application of local planning (e.g. Area Structure Plans, Municipal Development Plans, and the Land Use Bylaw as well as local character and context for adjacent or impacted land uses). The engagement form should be modified to make it clear if and how the proposed project aligns with these various plans. This could be achieved by asking clearly if proposed project is aligned with each planning policy followed by details of how it aligns or where it fails to comply. The AUC should place a greater degree of consideration on municipal planning documents under this review.

If the form is completed by the proponent, then the form must include sufficient time for the municipality to review and sign off if they agree the project aligns with their planning policies. In the case of disagreement between the municipality and the proponent on whether a project is in alignment, the AUC should consider the municipal perspective to have priority, as they are the owner of the planning policies.

**Setbacks for renewable energy facilities**

Greenview understands the AUC is considering implementing setback distances between renewable energy projects and existing developments. Greenview has the ability to establish its own setbacks for development in our planning documents and if given sufficient expectations they will be respected by the AUC, would be preferrable. Of concern is if setbacks established by the AUC would be reciprocal in nature and have the effect of sterilizing adjacent lands for a significant array of other land uses.

As municipal governments are the experts on local land use policy development and its application, the AUC should default to local planning bylaws and policy where it exists. If the AUC does implement provincewide setbacks, they should apply as defaults only where a municipality does not have local setback requirement already established.

Setbacks should also not be relegated to the distance between a placement on a parcel and the property or project boundary. Local government also has the planning authority to mange the density of development uses within its community or in relation to each other. Grouping of development in one area, the dispersion distance between similar uses or the restriction to the proximity of competing uses are all facets of local decision making and should be available for management by the municipality where they have identified such policies.

**Reclamation Security**

Greenview are in favour of securities being required for future projects. Reclamation securities are necessary to protect the public interest and ensure that industry is held accountable, and lands taken out of food production are returned to an equivalent capacity for production. Proponents should be required to verify reclamation securities as early in the approval process as possible to avoid creating unnecessary work for municipalities.