Lacombe County

Draft municipal engagement form

The municipal engagement form should be made compulsory as municipalities play a crucial role in balancing land preservation with local economic growth. Municipal feedback is essential for the AUC to understand how proposed projects impact agricultural or environmental land. It's important to consider the varying use and scale of prime agricultural lands across different municipalities.

Municipalities are already strained by the time, effort, and costs involved in participating in AUC consultations. The responsibility for completing the form should lie with the proponent, with the municipality's consent. This will help the proponent align the project with local plans. Adequate time should be provided for municipalities to review and approve the engagement form.

The form should be enhanced to clarify sections related to Municipal Development Plans (MDP), Intermunicipal Development Plans (IDP), and Land Use Bylaws (LUB). Questions should be included to assess alignment with the MDP, IDPs or LUB, as well as with Area Structure Plans.

To improve clarity, the form should outline the minimum expectations for municipal consultation instead of a simple yes/no question. A mandatory field should require a detailed explanation of the municipal consultation process. The level of consultation required should be clearly defined in the form

Specific sections addressing compliance with municipal setbacks, viewscapes and visual impacts need to be added to the form

In cases where municipalities have concerns or projects do not comply with planning documents, the AUC should set out procedures, such as triggering an automatic hearing. An automatic hearing would allow a review of planning documents, input from the proponent and municipality, and an evaluation of the project's land use impact. If there are disagreements between the proponent and the municipality, the municipality's viewpoint should take precedence during a hearing, with the municipality given the chance to address any discrepancies.

Methodology for visual impact assessment

Further research and consultation with expert stakeholders should take place. The methodologies developed must consider the local context and evaluate the effects on viewscapes as part of a public interest assessment for a project, balancing viewscapes with other public interest factors. Municipalities should be given a chance to contribute their perspectives on determining viewscapes.

Appropriate value for field of view in glare assessment for solar power plant application

Further research and consultation with expert stakeholders should take place.

Rule 007 consultation sample table – setbacks for renewable energy facilities

If the AUC implements setbacks, it should still consider any applicable municipal setbacks. For example, where the project is situated on a local County township or range road, the County's setback regulations from the roadway should be taken into account by the AUC. Setbacks should be measured to the closest project infrastructure

Other - Agriculture and Environment

Utilizing the Land Suitability Rating System (LSRS) is not an accurate way of evaluating the impact of renewable energy projects on agriculture. The LSRS system was last scientifically validated by soil scientist ground truthing in 1995. LSRS ratings are not constant and evolve with climate changes over time. Despite newer versions being developed since 1995 that highlight data inaccuracies, these projections lack validation through ground truthing.

Numerous municipalities in Alberta boast thriving agricultural industries without Class 1 or Class 2 lands. Allowing development on Class 3 or other lands in those municipalities would still be detrimental to their agricultural industries. This underscores the significance of engaging with municipalities to grasp the local impact of a proposed project.

The method proposed by the AUC to gauge agriculture impact pre- and post-development remains unclear. Many factors contribute to a parcel of land's productivity, making it challenging to assess the agricultural value pre- and post- development, as historical data might not exist for each specific property. There are too many uncontrolled variables in the equation to accurately measure pre- and post- productivity.

Furthermore, there is ambiguity surrounding the definitions of productive agricultural land, agrivoltaics and coexistence. Establishing criteria outlining the minimum standards for coexistence in both crop and livestock settings is crucial. Productive agricultural land should encompass not only cultivated or pastured areas but also natural features that support vital ecosystem services like forests, watercourses, waterbodies, wetlands, and conservation lands. Evaluating the worth of ecosystem services within productive agricultural land poses a significant challenge.

Considering the practicality of sustaining a viable farming operation alongside certain renewable energy developments is essential. For instance, in a crop + solar project, specialized equipment may be necessary to continue farming the land. Even if a significant portion of the land remains farmed, post-development farming may differ from pre-development practices. The specialized equipment and knowledge that will be required to successfully farm in coexistence with a renewable energy project will significantly hinder the practicality of coexistence

Adopting a uniform approach such as the LSRS system removes the responsibility from the proponent to understand, appreciate and assess the unique value of the land being developed. Tailored, site-specific assessments are essential to maintaining the delicate balance between sustainable development and agricultural preservation.

If the AUC continues drafting the requirements utilizing the LSRS system, investments into ongoing research and fieldwork are required to update and validate the LSRS. These investments will be required in order to provide more accurate and reliable data for decision-making. This continuous improvement approach can help adapt to changing climate conditions and evolving agricultural practices.

Other - Reclamation Security

Rule 007 should specify when proponents need to confirm that their reclamation security obligations have been fulfilled during the project approval process. This verification should be requested early on to prevent unnecessary work for the AUC, municipalities, and other involved parties.