

Thank you for the opportunity to provide input on the proposed changes to Rule 007. On behalf of Council for the County of Stettler No.6, I offer the following comments:

1. One of the County's concerns with Rule 007 is the way public engagement and stakeholder engagement is carried out by project proponents. Our experience with the three applications that we have seen to date suggests that the lack of full disclosure of information by proponents is an issue. Landowners and the County may have some information about the project, usually a brochure and cross reference to the AUC process, but not all the information. Studies related to issues that are commonplace, like noise impacts and glare impacts, are not provided before an opinion on a project is being sought. We did not see a section in the draft update that ensures disclosure of all relevant information prior to formal submission of the application.
2. The idea of a basic municipal information form that would be filled in by the municipality for a specific project is a start in getting accurate information about local planning to the AUC; however, the County notes that filling out the proposed form will require more detailed information from proponents to facilitate a full assessment. Proponents often note that their plans may change or the full studies on likely impacts (see above) may not be provided. Some statutory plan policies may depend on the nature of expected offsite impacts and how they are proposed to be addressed. This makes it difficult to accurately fill out the proposed form. It is the reason why municipalities employ the concept of a "complete application" before having to make our own development permit decisions on these types of projects. The proposed 30 day timeframe to fill in the form should only start after the municipality has received all the detailed information needed to facilitate an assessment. The proposed form, if completed by the municipality, should be submitted directly to the AUC case manager.
3. The requirement for agricultural impact assessments for projects located on Class 2 or Class 3 is a positive addition to facilitate a more informed discussion of individual projects. Part of the assessment should look at the question of alternative locations in the vicinity that may have less impact on agricultural production and, if needed, explain why the least impact location was not selected.
4. The reclamation security should be based on a set approach established by the Government of Alberta rather than seeking proposals from proponents. The approach should:

- Ensure the security is held by a third party who possesses skills and knowledge or can access through use of the security amount the required professional expertise, in project management and navigation of the market for recyclable materials to meet the assumptions of the security calculations and be able to successfully carry out the reclamation.
 - Ensure the security is in place prior to construction.
 - Ensure the reclamation and security provisions avoid the creation of a derelict industrial site should the project not progress as predicted to full construction and operation.
 - Ensure the reclamation provisions address any mid-life damage to the project with a requirement for either reinstatement of infrastructure and/or partial reclamation where reinstatement of infrastructure is not desired.
 - Ensure that there is monitoring post-facility removal to return the project site to a comparable level of agricultural productivity that existed before the project and any follow up reclamation efforts needed if agricultural production has not returned to pre-facility levels.
 - Ensure the reclamation plan and security provided will be updated and adjusted over the life of the project to ensure the amounts are adequate.
 - Ensure that all calculations used to determine the security amount are verified by the Government of Alberta or the AUC.
5. Seeking input on emergency response planning is laudable; however, the nature of the potential risks must be disclosed to those being asked to evaluate the emergency response plan (see above comments regarding disclosure of full information) and the nature of the proposed equipment to be used in the project cannot be “to be determined at a later date.” It may be best to require an initial assessment of capacities of local responders and a draft emergency response plan at the time of application with a full emergency response plan developed for the final project design and equipment prior to construction.

County.of.Stettler.