

1.0 PROPOSAL OVERVIEW

Tetra Tech Canada Inc. (Tetra Tech) was retained by SR Scotford, Inc. (SRS) to develop and carry out the Public Engagement Plan (PEP) as part of the development permit process for the Scotford Solar Power Project (the Project). The Project is to be located approximately 14 kilometres (km) northeast of the City of Fort Saskatchewan, Alberta, within legal land descriptions NW-5-56-21-W4M, NE-6-56-21-W4M, SE-7-56-21-W4M, and NW/SW-8-56-21-W4M (Figure 1).

The Project will consist of a 58-megawatt (MW) photovoltaic solar energy conversion system and associated infrastructure. It will be connected to the existing Altalink Management Ltd. (Altalink) Substation 409S, which is within the Alberta Utilities Commission (AUC) designated Scotford Industrial System Designation (Scotford ISD; Order 25647-D02-2020). The Project will allow for the generation of electricity from a renewable resource, reducing the volume of electrical energy required from gas-turbine generators and gas-fired power plants within the Scotford ISD. All energy generated by the Project will be used within the limits of the Scotford ISD and will not be exported to the Alberta Interconnected Electrical System (AIES).

A proposed amendment to the Heartland Area Structure Plan (ASP) is being prepared to amend the text within the ASP to include "renewable energy" in Policies 3.2.10 and 4.4.2 to allow for the consideration of large-scale solar collector installations. The proposed text amendments would be applicable to the entire Environmental Policy Area of the ASP.

1.1 Public Engagement Plan

SR Scotford, Inc. followed the process for a PEP as outlined in the Statutory Plan Terms of Reference (ToR; Strathcona County 2022). The PEP for the Project was submitted to Strathcona County on April 18, 2022 and approved on May 5, 2022, with mailing addresses provided to SRS by the Strathcona County Industrial Planning Officer.

2.0 ENGAGEMENT OPPORTUNITIES, NOTIFICATION AND ATTENDANCE

As a condition of PEP approval, Public Information Notification was conducted in accordance with the requirements of the ToR and the Strathcona County Statutory Plans Procedure (Strathcona County 2020). Landowner notification packages consisted of a letter describing the Project and the proposed ASP Amendment, and a postage-paid envelope. A copy of the notification letter is provided in Appendix A. Seventy-six notification letters were mailed on May 9, 2022 to the landowners within the notification area (Appendix B), 21 days prior to the comment deadline submission date of May 30, 2022.

3.0 COMMENTS AND RESPONSES

Out of the 76 notifications packages sent by mail, SRS received one comment via email on May 30, 2022 and one comment via letter mail the week of June 6, 2022. Tetra Tech confirmed that both comments came from landowners who had been mailed a notification package. A copy of the comments received, and SRS' response is provided in Appendix C. SR Scotford, Inc. sent a reply on June 16, 2022 to the landowner who had sent the email on May 30. A breakdown of the public comment and response is provided in Table 1. The other landowner did not receive a reply as they stated that they agreed to the amendments. No other public comments were received.

Table 1: Public Comment and Response

Topic	What We Heard	Response/Resulting Actions
Environment	<p>We heard support for renewable energy development within the ASP but questioned whether there would be a requirement to retain a wildlife corridor along the North Saskatchewan River.</p>	<p>The location of the Project was selected to utilize previously cleared, well drained, and actively cultivated land which provides sufficient area to meet the Project’s size. The Project is sited directly adjacent (north and west) to the Scotford Industrial Complex, to provide a close point of interconnection, and so that the solar facility could be incorporated into the current land-use regime and maintain an integrated land management (ILM) approach. Alternative siting locations around the Scotford Industrial Complex were considered, however these locations were deemed to have greater potential impacts to forest and wetland habitats, were constrained by existing industrial facilities, including pipeline rights-of-way (ROWs), or were too far from the point of interconnection.</p> <p>The Temporary (Construction) Project Footprint is set back a minimum of 100 m from the North Saskatchewan River and the Permanent Project Footprint is set back a minimum of 102 m from the North Saskatchewan River. This buffer distance will retain the entirety of the existing vegetated corridor along the south edge of the North Saskatchewan River and will not create a barrier to wildlife movement along the vegetated river corridor. Additionally, there will be no riverbank vegetation removed as part of the Project, and the entire Permanent (Operational) Project Footprint (except for 0.35 ha of gravel access road) will be fenced to ensure no wildlife entrapment. SR Scotford, Inc. will design the facility boundary fence to limit the use of 90-degree corners so that wildlife cannot be funneled and cornered. Lastly, the Project will not directly impact the North Saskatchewan River or any ephemeral waterbodies or wetlands, as all permanent Project Infrastructure and temporary workspace has been setback from these features.</p> <p>The Project received a renewable energy Referral Report from Alberta Environment and Parks – Fish and Wildlife Stewardship (AEP-FWS) branch in June 2022. The Referral Report from AEP-FWS acknowledges that the Project will be developed on the top of bank area; however, AEP-FWS has determined the Project poses a low risk to wildlife and wildlife habitat, based on Project siting, high wildlife use in the area, and commitments made by SRS to mitigate and monitor wildlife impacts.</p> <p>This Project is consistent with Strathcona County’s <i>Environmental Framework: Renewing Our Future</i> (June 2021), which is their strategic guiding document for governance, community development, infrastructure, and program and service delivery. More specifically, it is consistent with the desired outcome of reducing energy use, committing to energy efficiency, and embracing renewable energy sources protects healthy ecosystems and healthy citizens. This is to be achieved through implementation of several objectives, specifically:</p> <p>OBJECTIVE E4: Increase renewable and alternative energy sources (solar, wind, geothermal). OBJECTIVE E5: Evaluate procurement of goods and services to increase energy efficiency and increase renewable/alternative energy sources. OBJECTIVE E6: Educate and engage with citizens to encourage behaviours that support energy efficiency and the transition to renewable/alternative energy.</p>
Project Siting	<p>We heard concerns that siting the Project on a brownfield or contaminated site may be more appropriate than an area currently used for agriculture and would be consistent with the objectives of the Environmental Policy Area (i.e., conserving the North Saskatchewan River, enabling opportunities to interact with the river valley).</p>	<p>As noted in Response 1 (above), several factors were considered in selecting the location of the proposed Project. Alternative siting locations around the Scotford Industrial Complex were considered, however these locations were deemed to have greater potential impacts to forest and wetland habitats, were constrained by existing industrial facilities, including pipeline ROWs, or were too far from the point of interconnection.</p>

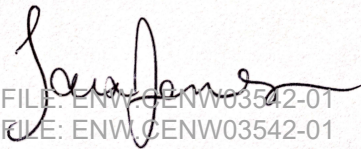
Table 1: Public Comment and Response

Topic	What We Heard	Response/Resulting Actions
		<p>It is not anticipated that the development of the Project will impact the North Saskatchewan River, nor will it impede opportunities to interact with the river valley. The project is to be developed on an existing private agricultural property, which is currently not directly accessible to the public, and will result in no change to river valley accessibility. As such, development of the Project remains consistent with the objective of the Environmental Policy Area of the Heartland Industrial Area Structure Plan (Bylaw 24-2018).</p> <p>The conservation policy #2, noted in Bylaw 24-2018, requires that new development that is not related to agriculture, passive recreational activities or aggregate extraction be located outside of the Environmental Policy Area to ensure the conservation of the North Saskatchewan River. This is why a submission for a text amendment to allow for renewable energy development has been applied for. Although the primary land use of the property is changing from agricultural to a solar facility, it should be noted that once installed, the Project will be significantly less disruptive than aggregate extraction, which was a historical land use on the property. In addition, by implementing environmental protection measures developed and approved by AEP-FWS, it is expected that residual effects on the biophysical environment will be short term and minimal.</p>
<p>Project Siting</p>	<p>We heard concerns that the location of the Project may not allow for wildlife movement and that a siting on a brownfield site would be more appropriate.</p>	<p>This Project followed the requirements of the <i>Wildlife Directive for Alberta Solar Energy Projects</i> (the Directive; Government of Alberta 2017) from Alberta Environment and Parks. The Directive encourages the siting of solar projects within urban limits as urban solar projects have limited impact to wildlife and wildlife habitat. Although the Project is not specifically within an urban area, it does fit within the context of an urban area.</p> <p>The AEP-FWS Referral Letter for the Osi Pisim Chem Solar Project (which is a solar facility application within the adjacent quarter section, NE 05-056-21 W4M, submitted by Shell Chemicals Canada) was reviewed, within the Referral Letter, AEP-FWS states that the Osi Pisim Chem Solar Project is sited within the Scotford Industrial Complex, which is considered an industrial facility that meets the same conditions as an urban area. The Scotford Industrial Complex has a consistent daily population of over 1,000 people, continuous human/vehicle activity 24 hours per day, and multiple high impact industrial activities on-site (Government of Alberta 2020). The Directive defines an Urban Area as any location within the municipal boundaries of cities, towns, and villages where subdivision development exists within 800 m of the proposed facility. Over 80% of the Project Area is located within 800 m of the Scotford Industrial Complex.</p> <p>As noted in Response #1, the Project’s Temporary (Construction) Project Footprint is set back a minimum of 100 m from the North Saskatchewan River and the Permanent (Operational) Project Footprint is set back a minimum of 102 m from the North Saskatchewan River. This buffer distance will retain the entirety of the existing vegetated corridor along the south edge of the North Saskatchewan River and will not create a barrier to wildlife movement along the vegetated river corridor. Additionally, there will be no riverbank vegetation removed as part of the Project, and the entire Permanent (Operational) Project Footprint (except for 0.35 ha of gravel access road) will be fenced to avoid wildlife entrapment. The current land use of the area is agricultural, which is an existing disturbance to the natural area. It is anticipated that the proposed Project will not change the conservation value of the river valley.</p>

4.0 CLOSURE

We trust this document meets your present requirements. If you have any questions or comments, please contact the undersigned.

Respectfully submitted,
Tetra Tech Canada Inc.



FILE: ENW.CENW03542-01
FILE: ENW.CENW03542-01
FILE: ENW.CENW03542-01



FILE: ENW.CENW03542-01
FILE: ENW.CENW03542-01
FILE: ENW.CENW03542-01

Prepared by:
Tara Jones, B.Sc.
Senior Environmental Planner
Environment & Water Practice
Direct: 403.723.1516
Tara.Jones@tetrattech.com

Reviewed by:
Eva Schulz, B.Sc., P.Ag.
Manager – Biological Sciences, Western Canada
Environment & Water Practice
Direct: 403.723.1501
Eva.Schulz@tetrattech.com

/cee