



## ATTACHMENT 'D': APPLICATION REFERRALS

AGENCY	COMMENTS
<b><i>Federal Agencies</i></b>	
Nav Canada	<p><i>Original PRDP20214577 Comment:</i></p> <p>NAV File #22-1647</p> <p>NAV CANADA has evaluated the captioned proposal and has no objection to the project as submitted. Our assessment does not constitute an approval and/or permit from other agencies.</p> <p>The subject proposal data have been distributed to External Design Organizations (EDOs) for their assessment of possible effects on procedures they maintain. They will contact you directly if any concerns arise during their evaluation. If you have any questions or concerns pertaining to their assessment, please contact the EDO directly.</p> <ol style="list-style-type: none"> <li>1. NAV CANADA does not require notification of construction; however, if you should decide not to proceed with this project, please advise us accordingly so that we may formally close the file. If you have any questions, contact the Land Use Department by email at <a href="mailto:landuse@navcanada.ca">landuse@navcanada.ca</a>.</li> </ol> <p><i>Revised PRDP20226218 DP Comment:</i></p> <ul style="list-style-type: none"> <li>• Land Use file 22-1647</li> <li>• We already have a file for this project, we sent the responses letter on May 09<sup>th</sup>, 2022;</li> <li>• Please see attached documents and let me know [22-1647 Letter to Proponent]</li> <li>• Letter Summary:</li> </ul> <p><i>NAV CANADA has evaluated the captioned proposal and has no objection to the project as submitted. Our assessment does not constitute an approval and/or permit from other agencies.</i></p>
Transport Canada	<p><i>Original PRDP20214577 Comment:</i></p> <p>No response received to Administration to date;</p> <p>The Applicant has applied for an Aeronautical Assessment Obstacle Notice and Assessment approval.</p> <p><i>Revised PRDP20226218 Comment:</i></p> <ul style="list-style-type: none"> <li>• No response received to date;</li> </ul>
<b><i>Province of Alberta</i></b>	
Airport Authority	<p><i>Original PRDP20214577 Comment:</i></p> <p>Please be advised that the Calgary Airport Authority has no objection to this proposal as submitted.</p>



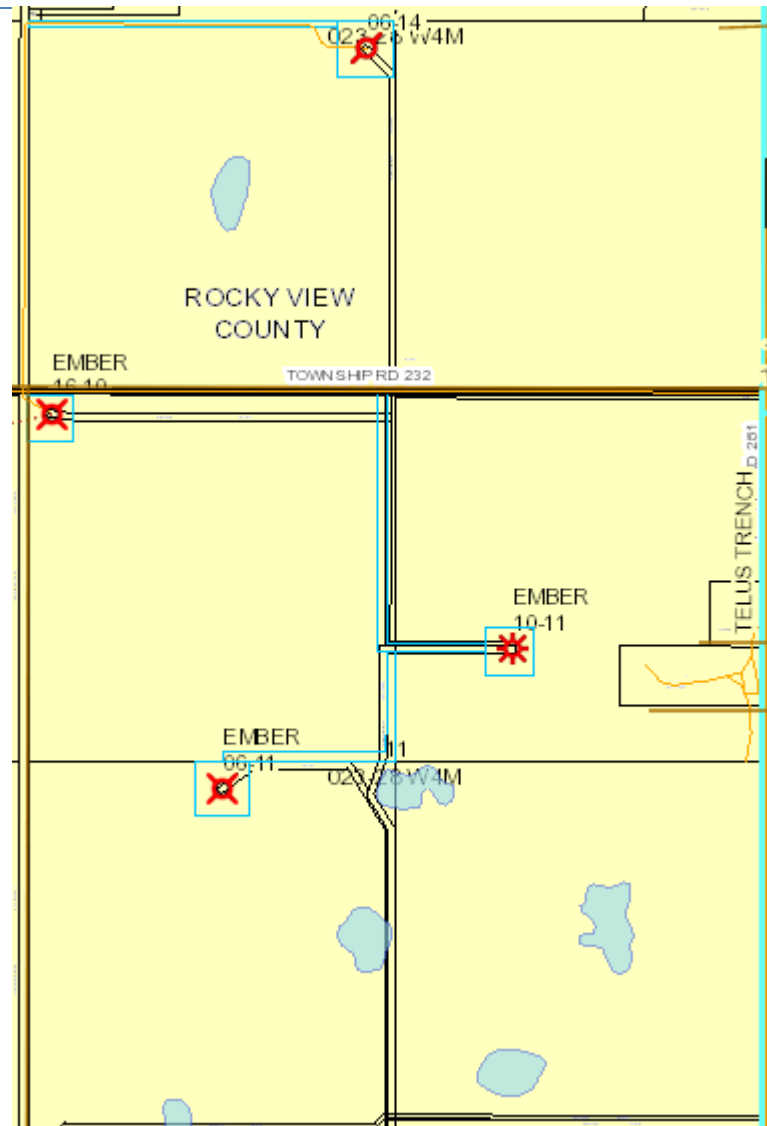
AGENCY	COMMENTS
Alberta Energy Regulator	<p>The proposal does not meet the criteria for the Calgary Airport Authority to provide comment on, we take the following into consideration:</p>
	<ul style="list-style-type: none"> <li>• YYC Zoning Obstacle Limitation Surfaces (OLS)</li> <li>• Nav Canada Electronic Zoning</li> <li>• TP1247 – Land Use in the Vicinity of Airports</li> <li>• <i>Airport Vicinity Protection Act</i> (AVPA)</li> </ul>
	<p>Please ensure that you include Transport Canada and Nav Canada on the proposal to ensure that they have the chance to review the proposal.</p>
	<p><i>Revised PRDP20226218 Comment:</i></p>
	<ul style="list-style-type: none"> <li>• PDF PRDP2022-6218 YYC 2093</li> </ul>
	<p>The purpose of this letter is to reply to your request of November 24, 2022, to review the Development Permit PRDP2022-6218 with respect to the proposed Solar Farm development. Please be advised that the Calgary Airport Authority has the following comments:</p>
	<p>The proposal does not meet the criteria for the Calgary Airport Authority to provide comment on, we take the following into consideration at the time of our review:</p>
	<ul style="list-style-type: none"> <li>• YYC Zoning Obstacle Limitation Surface (OLS)</li> <li>• Nav Canada Electronic Zoning</li> <li>• TP1247 – Land Use in the Vicinity of Airports</li> <li>• <i>Airport Vicinity Protection Act</i> (AVPA)</li> </ul>
	<p>Please ensure that you include Transport Canada and Nav Canada on the proposal to ensure that they have the opportunity to review the proposal.</p>
	<p><i>Original PRDP20214577 Comment:</i></p>
	<p>Referrals are <b>not required</b> for subdivision or development applications:</p>
	<ul style="list-style-type: none"> <li>• That <b>do not</b> include a permanent dwelling, business, or public facility, as part of the application (such as applications for road closures, gravel pits, wind farms, storage lots, lot line adjustments, area structure plans, bylaw amendments, rezoning, etc. where no permanent dwellings or public facilities are being proposed in the application) or;</li> <li>• Where it is known that no sour gas facilities are located within the distances set out above.</li> </ul>
	<p>The bulletin can be found on the AER website at <a href="http://www.aer.ca/documents/bulletins/AER-Bulletin-2013-03.pdf">http://www.aer.ca/documents/bulletins/AER-Bulletin-2013-03.pdf</a>.</p>
	<p><i>Revised PRDP20226218 Comment:</i></p>
	<ul style="list-style-type: none"> <li>• No further comments received;</li> </ul>



AGENCY	COMMENTS
Alberta Health Services	<p><i>Original PRDP20214577 Comment:</i></p> <p>AHS-EPH is generally supportive of renewable energy developments that lead to increased energy resiliency while minimizing emissions that could cause public health concerns. We understand that the Alberta Utilities Commission regulates energy producers and may consider social and environmental impacts, while the local municipality, through land-use by-laws, regulates the use and development of land within the municipality.</p> <p>We provide the following comments for your consideration:</p> <ol style="list-style-type: none"> <li>1. <b>Air Quality:</b> While AHS-EPH recognizes that comparative emissions of solar farms will be quite low over their lifetime, it is recommended that consideration be given to development of a dust control strategy during site development to ensure minimization of dust generation during site preparation and construction. AHS would suggest best management practices be considered to control emissions from site disturbance and/or vehicle traffic during these periods.</li> <li>2. <b>Groundwater Protection:</b> AHS-EPH supports the completion of a hydrogeological assessment to ensure adequate supplies of groundwater are available for the anticipated uses of the solar farm, and that a plan be in place to ensure no contamination of surface or groundwater occurs through site construction and operation activities.</li> <li>3. <b>Hazardous Materials Management Strategy:</b> AHS-EPH understands electrical transformers may contain various hazardous materials and or liquids. We suggest that a strategy be implemented to ensure these materials are handled and stored safely, and to ensure that any spills be promptly identified and remediated. We would also recommend a program be in place to ensure safe storage of all products or equipment that may contain hazardous substances.</li> <li>4. <b>Glint and Glare:</b> AHS-EPH understands glint and glare from the solar installation are usually assessed as part of the AUC application process. If this is not the case AHS would recommend a glint and glare study that would confirm no adverse impacts on neighbouring residents and traffic in the area and to ensure all mitigation strategies are properly implemented.</li> </ol> <p>Please note that throughout all phases of development and operation, the property must be maintained in accordance with the <i>Alberta Public Health Act</i>, Nuisance and General Sanitation Guideline 243/2003, which stipulates:</p> <ul style="list-style-type: none"> <li>• <i>No person shall create, commit or maintain a nuisance. A person who creates, commits or maintains any condition that is or might become injurious or dangerous to the public health or that might hinder in any manner the prevention or suppression of disease is deemed to have created, committed or maintained a nuisance.</i></li> </ul>
Environment and Protective Areas	<p><i>Revised PRDP20226218 Comment:</i></p> <ul style="list-style-type: none"> <li>• No further response received;</li> </ul> <p><i>Original PRDP20214577 Comment:</i></p>



AGENCY	COMMENTS
Ember Resources	<p data-bbox="464 279 1458 342">Please accept the following comments, on behalf of Alberta Environment and Parks, Lands Delivery and Coordination South.</p> <p data-bbox="464 363 1479 457">A review of this application area appears to indicate the presence of a number of waterbodies. These numerous waterbodies located within the identified area may be crown claimed, as per section 3 of the <i>Public Lands Act</i>.</p> <p data-bbox="464 478 1455 541">Contact with the Water Boundaries unit in Edmonton is to be made for crown determination under Section 3 of the <i>Public Lands Act</i>.</p> <p data-bbox="464 562 1435 625">Should any water body be found to be crown owned, the Provincial wetland policy would be applicable as a guiding document.</p> <p data-bbox="464 646 1057 672"><a href="https://www.alberta.ca/water-boundaries.aspx">https://www.alberta.ca/water-boundaries.aspx</a></p> <p data-bbox="464 693 1446 787"><a href="https://open.alberta.ca/dataset/5250f98b-2e1e-43e7-947f-62c14747e3b3/resource/43677a60-3503-4509-acfd-6918e8b8ec0a/download/6249018-2013-alberta-wetland-policy-2013-09.pdf">https://open.alberta.ca/dataset/5250f98b-2e1e-43e7-947f-62c14747e3b3/resource/43677a60-3503-4509-acfd-6918e8b8ec0a/download/6249018-2013-alberta-wetland-policy-2013-09.pdf</a></p> <p data-bbox="464 808 1463 871">At this time, this application does not have the support of this department due to the large number of wetlands that appear to be affected.</p> <p data-bbox="464 892 932 917"><i>Revised PRDP20226218 Comment:</i></p> <ul data-bbox="513 938 932 970" style="list-style-type: none"> <li>• No further response received</li> </ul> <p data-bbox="464 1010 927 1035"><i>Original PRDP20214577 Comment:</i></p> <ul data-bbox="513 1056 842 1087" style="list-style-type: none"> <li>• No response received</li> </ul> <p data-bbox="464 1108 927 1134"><i>Revised PRDP20226218 Comment</i></p> <p data-bbox="464 1155 776 1186"><i>Response 1:12.09.2022</i></p> <p data-bbox="464 1207 1446 1302">Ember has reviewed the proposed development permit application and have some questions and concerns with the proposal. We noticed that on the application under Site Information, they have checked "NO" for:</p> <p data-bbox="513 1323 1406 1354">A. Oil or gas wells present on or within 100 m of the subject property</p> <p data-bbox="464 1375 1479 1564">This is not accurate as Ember has identified four active wells and associated access roads and 5 pipeline segments that will be directly affected by the proposed solar farm. Ember does not object to the proposed Solar Farm in general, however we would like to be included in future planning to ensure our existing assets are protected and access to these assets are maintained in the event of an emergency.</p> <p data-bbox="464 1585 1446 1722">The Applicant can reach out to myself to discuss Ember's concerns in detail. Please pass on my contact info to the Applicant as it would be beneficial to start having some preliminary discussions in the near future to prevent any potential delays.</p> <p data-bbox="464 1743 784 1774"><i>Response 2: 12.13.2022</i></p> <p data-bbox="464 1795 1487 1879">Ember Resources Inc. has a setback for the 15 meter right of way and a setback for wellsite's is 100 meters from well center. W/S and A/R as shown on the attached sketch.</p>



## Transportation and Economic Corridors

In reviewing the application, the proposed development does not fall within the permit area of a provincial highway as outlined in the *Highways Development and Protection Act / Regulation* and will not require a roadside development permit from Alberta Transportation.

*Revised PRDP20226218 Comment:*

- 11.30.2022 AT requested copy of TIA for review



AGENCY	COMMENTS
	<ul style="list-style-type: none"> <li>11.30.2022 Copy of TIA sent over for review</li> <li>No further response received;</li> </ul>
<b>Internal Departments</b>	
Agricultural Services	<p><i>Original PRDP20214577 Comment:</i></p> <p>Weed Management Plan Required – details to be confirmed.</p> <p>Applicants/owners will need to ensure compliance with the Alberta <i>Weed Control Act</i> (the Act) and be prepared to deal with any weed issues that arise.</p> <p>Please see below for the guidelines for creating a weed management plan:</p> <ol style="list-style-type: none"> <li>1. Initial and ongoing identification of weed species present prior to any ground disturbance, during development and post-development for the entire site.</li> <li>2. Identification of control methods and timelines to be used, which ensures that all noxious and prohibited noxious weeds (as defined by the Act) are prevented from going to seed. i.e.: spraying/mowing schedule.</li> <li>3. Identification of the party responsible for weed control. Contact information should include contractor(s) hired for all weed control operations and/or individuals responsible for the work.</li> </ol> <p><i>Revised PRDP20226218 Comment:</i></p> <ul style="list-style-type: none"> <li>It appears the parcel will be used for some limited agricultural uses, but it would be of benefit to the Applicant to create a Weed Management Plan and have a contractor available (or be personally prepared) to control any regulated weeds.</li> <li>The Applicant will need to ensure compliance with the <i>Alberta Weed Control Act</i></li> </ul>
Building Services	<p><i>Original PRDP20214577 Comment:</i></p> <p><b>Initial Response:</b> A building permit will be required for the building located at the substation once the development permit has been approved. Please follow the checklist below for commercial buildings and submit the applicable documentation as required at the building permit application stage. If there is more than one building being constructed, each building would require its own building permit.</p> <p><b>Revised Response:</b> Based on the information supplied so far for these proposed Ehouses, it has been determined that a building permit will be required once your development permit has been approved. They appear to be in all but name a Sea Can with electrical equipment and will be accessed to the interiors of the building(s). The link below will direct you to the commercial building checklist requirements. The checklist below and the Commercial building permit application can be found on the Rocky View County Website. You will also find information on the Rocky View County website on the fees associated with the permit.</p>



AGENCY	COMMENTS
Capital Project Management – Engineering	<i>Revised PRDP20226218 Comment:</i>
	<ul style="list-style-type: none"> <li>See: Building Code Comments for Proposed Development, dated December 7, 2022:               <ul style="list-style-type: none"> <li>If any of the buildings are 10.00 m<sup>2</sup> or bigger a building permit will be required</li> </ul> </li> </ul>
	<i>Original PRDP20214577 Comment:</i>
	<b>General:</b>
	<p>The review of this file is based upon the application submitted. These conditions/recommendations may be subject to change to ensure best practices and procedures.</p> <p>The Applicant submitted a Construction Management Plan prepared by Indus Solar Plant Inc dated October 2021. The Construction Management plan detailed noise mitigation measures, traffic accommodation, sedimentation, dust control, stormwater management, erosion &amp; weed control, waste management, firefighting procedures, evacuation plan, and hazardous material containment during construction. Engineering has no other concerns currently.</p> <p>The Applicant submitted a Noise Impact assessment prepared by IBI Group, dated April 10, 2019. The Noise Impact Study determined that the proposed project is compliant with the nighttime PSL with a margin between 4-5Db and the daytime PSL with a margin of 5Db.</p> <p><b>Geotechnical:</b></p> <p>The applicant submitted a Geotechnical report prepared by McIntosh Lalani Engineering Ltd., dated October 26, 2021. The geotechnical report concluded that the proposed foundation by the Applicant is feasible based on the in situ soil condition and anticipated structural loading. Engineering has no further comments currently.</p> <p><b>Transportation:</b></p> <p>The Applicant submitted a Transportation Study prepared by IBI Group dated September 30, 2021. The TIA provided an assessment of the impacts of traffic to be generated from the proposed development onto the local road network and concludes that the as the development does not generate a significant amount of traffic (15 employees), no offsite improvements are warranted. Engineering has no further requirements currently.</p> <p>The Applicant shall construct a new paved approach on Range Road 283 in order to provide access to the development. As a condition of DP, the Applicant shall contact County Road Operations to arrange a pre-construction inspection to confirm the proposed approach location and the County Servicing Standards to which the approach is to be built. Prior to occupancy, the Applicant shall contact County Road Operations for an interim-construction inspection and a post-construction inspection for final acceptance.</p> <p>The Applicant will be required to pay the transportation offsite levy as per TOL bylaw C-8007-2020.</p>





AGENCY	COMMENTS
	<p><b>Sanitary/Waste Water:</b></p> <p>Engineering has no requirements currently.</p> <p><b>Water Supply and Waterworks:</b></p> <p>Engineering has no requirements currently.</p> <p><b>Storm Water Management:</b></p> <p>As part of the redesignation application, the Applicant provided a Stormwater Management Review Memo prepared by the IBI Group dated May 09, 2018. The stormwater management concept consists of the use of the existing low-lying areas within the site contain the runoff from the solar farm. The memo also indicates that there will be limited grading work and that the runoff from the panels are to travel across the existing farmland to the naturally existing low-lying areas on the site where water will naturally dissipate and evaporate. Engineering has no further requirements currently.</p> <p>As part of this application, the Applicant provided a Stormwater Management Review Memo dated October 15, 2021. The Memo indicated that the previous analysis remains appropriate for the current site layout. Engineering has no further requirements currently.</p> <p>As part of the application, the Applicant provided an erosion and sedimentation control plan prepared by IBI Group dated October 15, 2021. The document is in accordance with County standards. Engineering has no further requirement currently.</p> <p><b>Environmental:</b></p> <p>As part of the application, the Applicant provided a Biophysical Impact Assessment prepared by Sage Ecological Solutions dated December 2021. The review included a summary of the findings from a desktop review of publicly available materials and a comprehensive field investigation by resource specialists. The study lists potential environmental impacts from the proposed development such as wetland loss, soil loss, alteration to wildlife and amphibian habitats and risks to avian species. The review also provided wetland delineation mapping of the various onsite wetland which vary from ephemeral – Class IV. Engineering has no further requirements currently.</p> <p>The Applicant has received clearance from <i>Alberta Culture &amp; Tourism under the Historical Resources Act</i> for the proposed Solar Farm.</p> <p>As a permanent condition, the Applicant will be required to obtain all necessary approvals from AEP for the disturbance/loss of the onsite wetlands.</p> <p>As a permanent condition, the Applicant will be required to adhere all recommendations made in the Desktop Environmental Review prepared by Triton Environmental Consultant.</p> <p><i>Revised PRDP20226218 Comment:</i></p> <p><b>General</b></p> <p>The Applicant submitted a Construction Management Plan prepared by Indus Solar Plant Inc dated October 2021. The Construction Management plan detailed noise mitigation measures, traffic accommodation, sedimentation, dust</p>





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	<p>control, stormwater management, erosion &amp; weed control, waste management, firefighters procedures, evacuation plan, and hazardous material containment during construction. Engineering has no other concerns currently.</p> <p>The Applicant submitted a Noise Impact assessment prepared by IBI Group, dated April 10, 2019. The Noise Impact Study determined that the proposed project is compliant with the nighttime PSL with a margin between 4-5Db and the daytime PSL with a margin of 5Db.</p> <p><b>Geotechnical</b></p> <p>The Applicant submitted a Geotechnical report prepared by McIntosh Lalani Engineering Ltd. Dated October 26, 2021. The geotechnical report concluded that the proposed foundation by the Applicant is feasible based on the in-situ soil condition and anticipated structural loading. Engineering has no further comments currently.</p> <p><b>Transportation</b></p> <p>The Applicant submitted a draft TIA prepared by IBI Group dated September 30, 2021. The TIA provided an assessment of the impacts of traffic to be generated from the proposed development onto the local road network and concludes that the as the development does not generate a significant amount of traffic (15 employees), no offsite improvements are warranted. Engineering requests that the final signed and stamped TIA be provided.</p> <p>A new approach on Range Road 282, south of Township Road 232, is proposed to provide access to the site/URW.</p> <p><b>At this time</b>, the Applicant is required to provide a copy of written consent from the utility operator to access the URW.</p> <p>The Applicant is advised that if access is proposed from Range Road 282 south of Township Road 232 then approximately 50m of gravel road, including a gravel turn-around, must be constructed to facilitate the new approach. Alternatively, Access can be taken directly from Township Road 232 with a paved road approach.</p> <p><b>At this time</b>, the Applicant is required to provide more information to clarify and confirm the access strategy south of Township Road 232.</p> <p><b>At this time</b>, the Applicant is required to revise the site plans to clearly identify all proposed new approaches (for community garden access, etc.) as well as all existing approaches no longer needed and that shall be removed.</p> <p>The Applicant shall construct a new gravel approach on Range Road 282, north of Township Road 232, to provide access to the proposed substation.</p> <p><b>As a condition of DP</b>, the Applicant shall contact County Road Operations to arrange a pre-construction inspection to confirm proposed approach location and the County Servicing Standards to which the approach is to be built.</p> <ul style="list-style-type: none"> <li>• <b>Prior to occupancy</b>, the Applicant shall contact County Road Operations for an interim-construction inspection and a post-construction inspection for final acceptance.</li> </ul> <p>The Applicant will be required to pay the transportation offsite levy as per TOL bylaw C-8007-2020.</p>



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	<p><b>Sanitary/Waste Water</b></p> <p>Engineering has no requirements currently.</p> <p><b>Water Supply And Waterworks</b></p> <p>Engineering has no requirements currently.</p> <p><b>Storm Water Management</b></p> <p>As part of the redesignation application, the Applicant provided a Stormwater Management Review Memo prepared by the IBI Group dated May 09, 2018. The stormwater management concept consists of the use of the existing low-lying areas within the site contain the runoff from the solar farm. The memo also indicates that there will be limited grading work and that the runoff from the panels are to travel across the existing farmland to the naturally existing low-lying areas on the site where water will naturally dissipate and evaporate. Engineering has no further requirements currently.</p> <p>As part of this application, the Applicant provided an updated Stormwater Management Review Memo prepared by IBI Group and dated May 10, 2022. The Memo indicated that the previous 2018 analysis remains appropriate for the current site layout. Engineering has no further requirements currently.</p> <p>As part of the application, the Applicant provided an erosion and sedimentation control plan prepared by IBI Group dated October 15, 2021. The document is in accordance with County standards. Engineering has no further requirements currently.</p> <p><b>Environmental</b></p> <p>As part of the application, the Applicant provided a Biophysical Impact Assessment prepared by Sage Ecological Solutions dated December 2021. The review included a summary of the findings from a desktop review of publicly available materials and comprehensive field investigation by resource specialists. The study lists potential environmental impacts from the proposed development such as wetland loss, soil loss, alteration to wildlife and amphibian habitats and risks to avian species. The review also provided wetland delineation mapping of the various onsite wetland which vary from ephemeral – Class IV. Engineering has no further requirements currently.</p> <p>The Applicant has received clearance from <i>Alberta Culture &amp; Tourism under the Historical Resources Act</i> for the proposed Solar Farm.</p> <p><b>As a permanent condition</b>, the Applicant will be required to obtain all necessary approvals from AEP for the disturbance/loss of the onsite wetlands.</p> <p><b>As a permanent condition</b>, the Applicant will be required to adhere all recommendations made in the BIA prepared by Sage Ecological Solutions.</p>
GIS Services	<p><i>Original PRDP20214577 Comment:</i></p> <ul style="list-style-type: none"> <li>• 232006 RANGE ROAD 282.</li> </ul> <p><i>Revised PRDP20226218 Comment:</i></p> <ul style="list-style-type: none"> <li>• No re-circulation required</li> </ul>



ROCKY VIEW COUNTY

AGENCY	COMMENTS
Operational Services – Road Maintenance	<p><i>Original PRDP20214577 Comment:</i></p> <ul style="list-style-type: none"> <li>• Confirmation on if a Road Use or Roaddata Permit required;</li> <li>• Compliance with the Road Use Agreement Bylaw C-8065-2020.</li> </ul> <p><i>Revised PRDP20226218 Comment:</i></p> <ul style="list-style-type: none"> <li>• No re-circulation required</li> </ul>
Operational Services – Road Operations	<p><i>Original PRDP20214577 Comment:</i></p> <p>Applicant to contact County Road Operations with haul details for materials and equipment needed for the construction of the proposed solar farm and any site regrading to confirm if a Road Use Agreement will be required for any hauling along the County's road system pursuant to the County's Road Use Agreement Bylaw C-8065-2020.</p> <p>Applicant to be reminded no business signage to be installed within County's road right-of-way of Twp Rd 232, Rge Rd 282 or Rge Rd 281.</p> <p>Site layout drawings included on pages 12 and 13 of the circulation show that the Applicant intends to construct new approaches of Rge Rd 282 to access the proposed new solar farm. Applicant will need to contact County Road Operations to confirm approach location and scope of work to ensure adherence to County Servicing Standards.</p> <p><i>Revised PRDP20226218 Comment:</i></p> <ul style="list-style-type: none"> <li>• No re-circulation required</li> </ul>

**Agency Circulation Period:**

- **Original:** November 8, 2021, to November 29, 2021
- **Revised:** November 24, 2022, to December 16, 2022

**Adjacent Landowner Circulation Period:**

- **Original:** April 27, 2022, to May 18, 2022
- **Revised:** November 25, 2022, to December 16, 2022