Farmers' Advocate Office

Renewable Energy

Update

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Laccombe County – Committee of the Whole

Mission

To create value for rural Albertans and our stakeholders by:

- ✓ empowering rural Albertans through awareness on key issues
- ✓ representing the rural Alberta perspective on matters of concern
- ✓ facilitating interaction on strategic matters among key stakeholders
- ✓ providing objective, unbiased ideas and advice for resolving disputes

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Pause on Renewable Projects

- The development of power plants on specific types or classes of agricultural or environmental land;
- The impacts of power plants on pristine landscapes or viewscapes;
- The mandatory posting of reclamation security by power plant proponents;
- The development of power plants on provincial Crown lands; and
- The impact of the growth of renewable power to Alberta's generation supply mix and electric system reliability.

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Bulletin 2024-25

Electric Energy Land Use and Visual Assessment Regulation

- Released December 6, 2024 by *Order in Council 368/2024*
- Alberta Utilities Commission Act
- Agricultural Land use and coexistence with Wind & Solar power plants
- Reporting on agricultural productivity
- Irrigability assessments for land within White Area
- Designation of buffer zones and visual impact assessment zones
- Development requirements and restrictions with zones

Definitions

“agricultural impact assessment” means an assessment that evaluates the anticipated effects of a wind power plant or solar power plant on agricultural productivity, including measures to achieve coexistence with agricultural operations;

“coexistence” means the concurrent use of land for a wind power plant or solar power plant and agricultural production;

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Definitions

"Land Suitability Rating System (LSRS)" means the system for evaluating land suitability based on soil, landscape and climate factors, as described in *Land Suitability Rating System for Agricultural Crops: 1 Spring-seeded small grains*, published by Agriculture and Agri-Food Canada in 1995 and amended from time to time;

Photo: Amalgam Landscape

"visual impact assessment" means an assessment to determine changes to the scenic attributes of a landscape brought about by the introduction of visual contrasts and the associated changes in the visual experience of the landscape;

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Technical Bulletin
Bulletin technique 1995–6E

Land Suitability Rating System for Agricultural Crops

1. Spring-seeded small grains

Canada

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Land Suitability Rating System (LSRS)‡

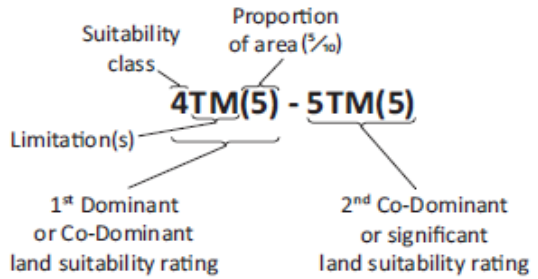
Suitability Definitions	
Class	Limitation
1*	none to slight
2	slight
3	moderate
4	severe
5	very severe
6	extremely severe
7	unsuitable
NR	Not Rated**

*LSRS is a national rating system and due to climate, Alberta has no Class 1 land

**Not rated includes areas such as water bodies or disturbed land (eg. gravel pits)

Land Suitability Rating System Restrictions and Limitations			
General Restriction	Subclass	Code	Limitation
C – CLIMATE	Temperature	H	Inadequate heat units for the optimal growth.
	Moisture	A	Inadequate moisture for the optimal growth.
S – SOIL	Water holding capacity/texture	M	Crops are adversely affected by lack of water due to inherent soil characteristics.
	Soil structure	D	Crops are adversely affected either by soil structure that limits the depth of rooting, or by surface crusting that limts the emergence of shoots.
	Organic matter	F	Mineral soil with a low organic matter content in the Ap or Ah horizon.
	Depth of topsoil	E	Mineral soil with a thin Ap or Ah horizon.
	Soil reaction	V	Soils with a pH value either too high or too low for optimal growth.
	Salinity	N	Soils with amounts of soluble salts sufficient to have an adverse effect on growth.
	Sodicity	Y	Soils having amounts of exchangeable sodium suffcient to have an adverse effect on soil structure and/or growth.
	Organic surface	O	Mineral soils having a peaty surface layer up to 40 cm thick.
	Drainage	W	Soils in which excess water (not due to inundation) limits the production.
	Organic soil temperature	Z	Additional temperature limitation associated with organic soils.
	Rock	R	Soils having bedrock sufficiently close to the surface to have an adverse effect on production.
	Degree of decomposition or fibre content	B	Organic soils in which the degree of decomposition of the organic material is not optimum for production.
	Depth and substrate	G	Shallow organic soils with underlying material that is not optimum for production.
L – LANDSCAPE	Slope	T	Landscapes with slopes steep enough to incur a risk of water erosion or to limit production.
	Landscape pattern	K	Land areas with strongly contrasting soils and/or non-arable onstacles that limit production or substantially impact management practices.
	Stoniness and coarse fragments	P	Land that is sufficiently stony or gravelly so as to hinder tillage or limit production.
	Wood content	J	Organic soils with a content of wood or of Eriophorum *sp.* sufficient to limit production.
	Inundation	I	Land areas subject to inundation or flooding that limits production.

Anatomy of a Land Suitability Rating



Examples of Land Suitability Ratings	
Rating	Explanation
2MT(10)	100% of the area is Class 2 land indicating slight limitations to growth. The limitations are caused by water-holding capacity of soils and slope conditions.
4TM(5) - 5TM(5)	50% of the area is Class 4 and 50% of the area is Class 5 indicating severe and very severe limitations to growth. The limitations are caused by slope conditions and water-holding capacity of soils.
4M(8) - 7NW(2)	80% of the area is Class 4 indicating a severe limitation to growth caused by water-holding capacity of soils. 20% of the area is unsuitable with limitations due to soil salinity and drainage.

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Definitions

"high-quality agricultural land" means land rated under the Land Suitability Rating System (LSRS) as:

(i) Class 1 or Class 2 land, **or**

(ii) Class 3 land that is situated within a municipality listed in Schedule 1; *(Below)*

Athabasca County	Lac La Biche County	I.D. #4 (Waterton)
Big Lakes County	Woodlands County	M.D. of Bonnyville
Clearwater County	M.D. of Ranchlands	Special Areas 3
County of Forty Mile	M.D. of Taber	
County of Newell	M.D. of Lesser Slave River	

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Agricultural land use and coexistence

A person applying for the construction or operation of a wind power plant or solar power plant on privately owned **high-quality** agricultural land must submit an agricultural impact assessment as part of the application.

Photo: Enel Green Power

- details of the expected effect of the wind power plant or solar power plant on agricultural productivity, and
- measures demonstrating that the wind power plant or solar power plant is designed to achieve coexistence with agricultural land use.

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Reporting on Agricultural Productivity

The owner or operator of a wind power plant or solar power plant situated on privately owned high-quality agricultural land must, within **36 months** from the start of operations, submit a report to the Commission that confirms the agricultural productivity of the land.

Irrigability Assessments for land within White Area

If required by the Commission, a person applying for the construction or operation of a power plant within the White Area must submit an irrigability assessment as part of the application.

- an evaluation of water quality and availability,
- an analysis of proximity to irrigation infrastructure,
- the economic viability or feasibility of irrigation, and
- the opinions of the relevant irrigation district, if applicable.

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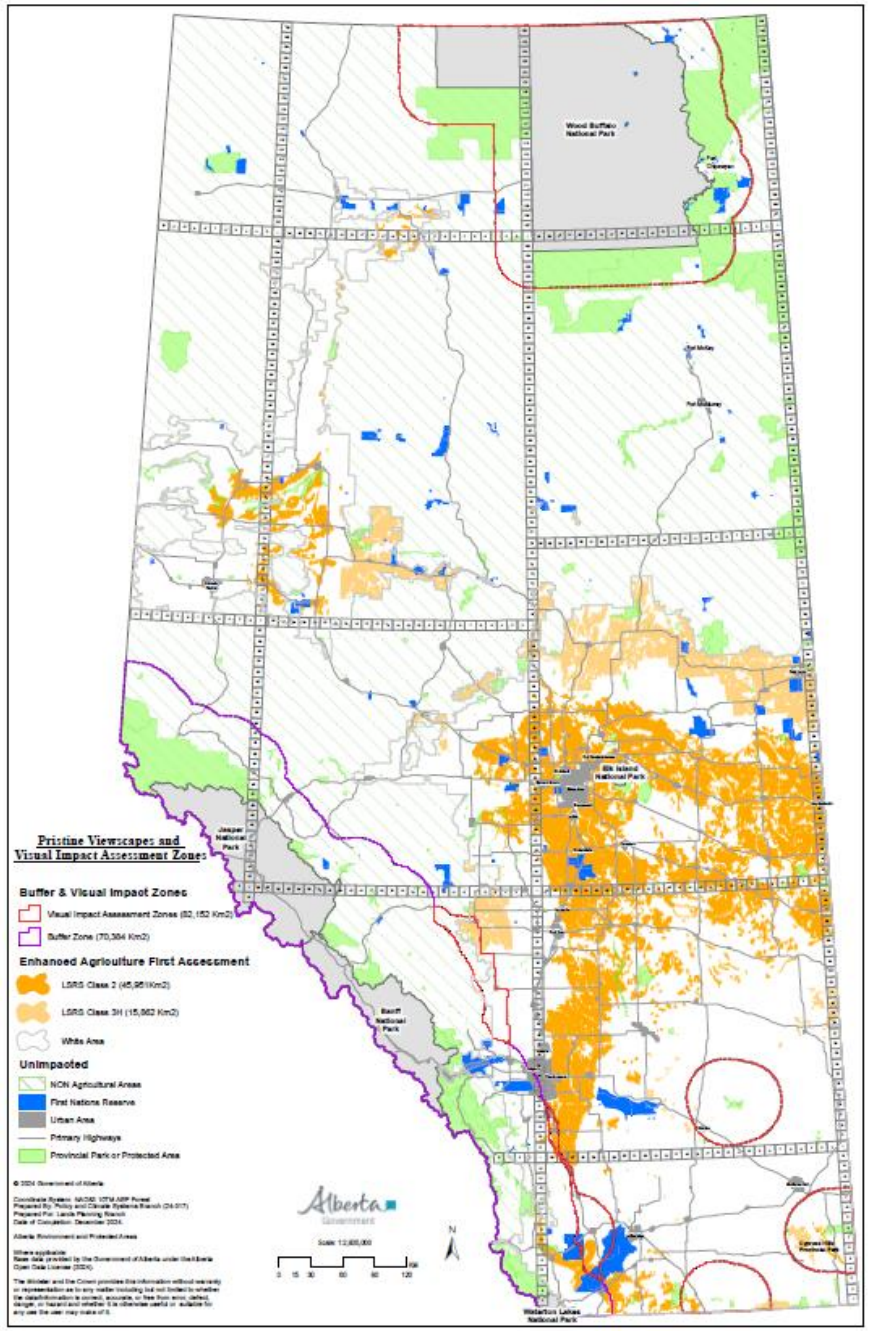
Pristine Viewscapes and Visual Impact Assessment Zones



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Development Requirements & Restrictions

An application within a buffer zone or a visual impact assessment zone must submit a visual impact assessment as part of the application.

A visual impact assessment must include

(a) an evaluation of the anticipated visual impacts on the buffer zone or visual impact assessment zone

(b) visual simulations from key vantage points illustrating the potential visual impact of the proposed power plant, and

(c) proposed mitigation measures to minimize or offset any adverse visual effects on the buffer zone or visual impact assessment zone

The Commission shall not accept any applications under AUC Rule 007 for the construction or operation of a wind power plant in a buffer zone.

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Reclamation Security

Additional GOA Policy Direction Implementation

- Activities Designation Regulation
- Conservation & Reclamation Amendment Regulation
- Creates consistent reclamation requirements
- Mandatory Reclamation Security Requirements
  - Developers will be responsible for reclamation costs via a mandatory security or bond.
  - The reclamation security will either be provided directly to the province or may be negotiated with landowners if sufficient evidence is provided to the AUC

Code of Practice {COP}

Registrations are required for all Solar & Wind developments

- New projects = before construction
- Existing projects = approved before January 1, 2025
- Existing projects have until January 1, 2027 to obtain registration

GOA-held security

- New = 30% at time of registration and 60% at year 15
- Existing = 15% at time of registration and 60% at year 15

Landowner-negotiated security

- Not determined by the GOA
- Signed 'Declaration'

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Bulletin 2025-06: Reclamation Security Guidelines

Applies to hosting landowner-held security

- proposed reclamation security program taken into consideration

Applies Wind & Solar applications filed on or after June 05, 2025

- Must continue to meet all information requirements in Rule 007

Amount of Landowner-negotiated security – before registration

- should be no less than 40 % of the estimated reclamation costs
- should be no less than 70 % of the most recent estimate of reclamation costs at Year 15

AUC considers each application on a case-by-case basis, and retains discretion to depart from these guidelines

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Guidelines to Evaluate Agricultural Land

“Guidelines to evaluate agricultural land for renewable generation”

- July 8, 2025 – Ministry of Agriculture and Irrigation
  1. Recap of legislated regulatory requirements
  2. Guidelines on ways to implement requirements
  3. Best Management Practices for siting, planning and operation
- Agricultural output aims at a goal of 80% of potential yield productivity
  - 5 year average
  - AFSC Crop Risk Areas
  - Range Inventory Manual
- Agricultural activities = per Agricultural Operation Practices Act
- July 9, 2025 – letter from Affordability and Utilities to AUC

Bulletin 2025-12: Cumulative Effects

Introduction of interim requirements for the consideration of cumulative effects

- June 3, 2025 letter from Affordability and Utilities to AUC
  - July 1, 2029 = AUC to provide report and recommendations for policy adjustments
- Applies to power plants and storage facilities 10 MW or greater
- Awareness of other existing developments
- +Pos or -Neg social, economic or environmental impacts or effects
- Efforts to align with Provincial Land-Use Framework
- Applies to applications filed on or after August 26, 2025

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Farmers' Advocate of Alberta

WE ARE HERE TO HELP

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FAO
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Thank You