



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

Alberta Utilities Commission
Eau Claire Tower
1400, 600 Third Avenue S.W.
Calgary, Alberta T2P 0G5
Aug 2, 2022

**RE: Statement of Intent to Participate
AUC Proceeding #27486 – Foothills Solar Power Plant and Substation Application**

Alberta Wilderness Association (AWA) is writing to express opposition to the Foothills Solar Power Plant and Substation Application. Founded in 1965, AWA strives to help Albertans understand the intrinsic values that wildlife and wilderness provide and encourage communities to participate in conservation initiatives that will ensure a legacy for future generations. With over 7,000 members and supporters in Alberta and across Canada, AWA is dedicated to conserving Alberta's wilderness, and advocating for conservation strategies that protect Canada's biodiversity.

AWA has concerns regarding the proposed project location within the boundaries of the Frank Lake Important Bird Area (IBA). Frank Lake supports significant bird populations and serves as an important area for the fall and spring migrations. Swans, ducks and shorebirds have been observed staging on or near the lake, and several at-risk species have been observed at Frank Lake, including bank swallows, Sprague's pipit, horned grebe and ferruginous hawk. The habitat requirements for the species frequenting Frank Lake extend beyond the limits of the lake and into the surrounding fields.

As an IBA, Frank Lake is internationally recognized as an area important for the conservation of bird populations. Alberta's Wildlife Directive for Alberta Solar Energy Projects states as a Best Management Practice: "200.1.1 The solar energy project should not occur within 1000m of a wetland based Important Bird Area (IBA) as per IBA Canada". The current siting of the project does not follow these guidelines and does not suggest minimal impact on wildlife.

The placement of a solar energy project in approximately 1600 acres of cultivated farmland near Frank Lake has the potential to cause significant harm to the wildlife populations in the area. The mortality of birds, particularly waterfowl, due to collision with solar panels has been documented, and AWA questions the decision to site the project within an IBA. We ask that the impact of the project on wildlife be carefully considered in the proceeding.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION

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Conservation Specialist