

Alberta Environment and Protected Areas - Fish and Wildlife Stewardship Renewable Energy Amendment Letter

The updated Georgetown Solar Project (the Project) proposed by Metlen Energy & Metals (the Proponent) was reviewed by the Alberta Environment and Protected Areas – Fish and Wildlife Stewardship (EPA-FWS) regional wildlife contact for renewable energy projects. EPA-FWS has reviewed the proposed project changes including location, mitigation strategies, including associated infrastructure and construction plans, and post-construction monitoring and mitigation program. Project information was presented by the Proponent in a Memorandum for Updated Surveys dated January 9, 2025, and accepted by EPA-FWS on February 5, 2025.

The EPA-FWS review of the updated Project was guided by the EPA-FWS policy document, *Wildlife Directive for Alberta Solar Projects* (October 2017; hereafter called the *Directive*) and the *Post-Construction Survey Protocols for Wind and Solar Energy Projects* (January 2020; hereafter called the *PCMP Protocol*). The Proponent must follow the *Directive* and *PCMP Protocol* for requirements on siting, pre-construction surveys, construction, operation, and post-construction monitoring and mitigation plans.

This amendment letter summarizes the review undertaken by EPA-FWS that was restricted to reviewing information provided in the submitted documents, completed by Matrix Solutions Inc. on behalf of the Proponent, and applying the wildlife standards and best management practices for the siting, construction, and operation of the solar facility. This office undertook no independent on-site assessment. This Renewable Energy Amendment Letter is not intended to relieve any party from any liability if there are detrimental effects to wildlife or wildlife habitat during construction or operation that were not identified and mitigated for in the documents submitted. It is the responsibility of the Proponent to ensure compliance under all other policy and legislation, including but not limited to the *Alberta Wetland Policy*, *Water Act*, *Code of Practice for Watercourse Crossings*, *Environmental Protection and Enhancement Act*, *Alberta Wildlife Act*, *Migratory Bird Convention Act*, and *Species at Risk Act*. Federal requirements may differ from EPA-FWS policy, therefore additional consultation may be necessary. EPA-FWS review does not eliminate the need for review by other branches of the Department, Government of Canada, or other governing bodies. This Amendment Letter summarizes the potential risks to wildlife and wildlife habitat based on the information provided to EPA-FWS.

The Memorandum identified additional impacts to 11 Class 3 wetlands with 7 of these being direct impacts (i.e., solar panels or fence built in wetland) and 4 of the wetlands having

infringed 100 m buffer (i.e., buffers ranging from 3 to 35 m). These changes are due to an updated project layout and updated wetland surveys that changed the wetland classification. Though no *Species at Risk* amphibians were reported from the surveys in 2024, the surveys were not appropriate to detect northern leopard frog and given known presence of this *Species at Risk* ~4 km from the Project area, there is the potential for negative impacts. Additional mitigations have been proposed and will reduce the risk to wetland habitat. Note, EPA-FWS must be notified if a *Species at Risk* is found during construction, and an appropriate Research Permit and Collection Licence must be obtained prior to any amphibian relocation. Considering this, there is now a moderate risk to wetland habitat and amphibians.

EPA-FWS has determined the Georgetown Solar Project proposed by Metlen Energy & Metals, remains an overall Low risk to wildlife and wildlife habitat, based on updated Project siting, surveys and commitments made by the Proponent to mitigate and monitor wildlife impacts. This EPA-FWS Renewable Energy Amendment Letter expires on February 9, 2027 (i.e., original Referral Report expiry date).



Signature: _____ Date: February 5, 2025
Printed Name and Position: Kristin Cline, Wildlife Biologist – South Region, Lethbridge, AB

Amendment Letter Summary

Project Information	Project Details
Project Name	Georgetown Solar Project
Municipality/County	Vulcan County
Project MW	230 MW
Proponent Name	Metlen Energy & Metals
Consultant Name	Matrix Solutions Inc.
Project Documents Submitted ¹	2024 Amphibian and Wetland Surveys for the Georgetown Solar Project.pdf
Date of Risk Assessment Expiry	February 9, 2027
Overall Risk Ranking	Low Risk

¹ Note: various clarifications and edits of the original documents are discussed in the subsequent files and these changes are to supersede the original documents.