



**Saturn Power Inc.**

**Springbrook Solar Project**

**July 8, 2022**



**Alberta Utilities Commission**

Decision 26893-D01-2022

Saturn Power Inc.

Springbrook Solar Project

Proceeding 26893

Applications 26893-A001 and 26893-A002

July 8, 2022

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## Contents

<b>1</b>	<b>Decision summary</b> .....	<b>1</b>
<b>2</b>	<b>Applications</b> .....	<b>1</b>
<b>3</b>	<b>Discussion and Commission findings</b> .....	<b>5</b>
	3.1 Rule 007 and participant involvement program.....	5
	3.2 Environmental effects .....	5
	3.3 Solar glare and operational safety.....	8
	3.4 Other considerations .....	10
<b>4</b>	<b>Decision</b> .....	<b>11</b>
	<b>Appendix A – Summary of Commission conditions of approval in the decision</b> .....	<b>12</b>

## List of figures

<b>Figure 1.</b>	<b>Springbrook Solar Project</b> .....	<b>2</b>
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## **1 Decision summary**

1. In this decision, the Alberta Utilities Commission approves applications from Saturn Power Inc. to construct, operate and connect a solar power plant, designated as the Springbrook Solar Project, located in Red Deer County.

## **2 Applications**

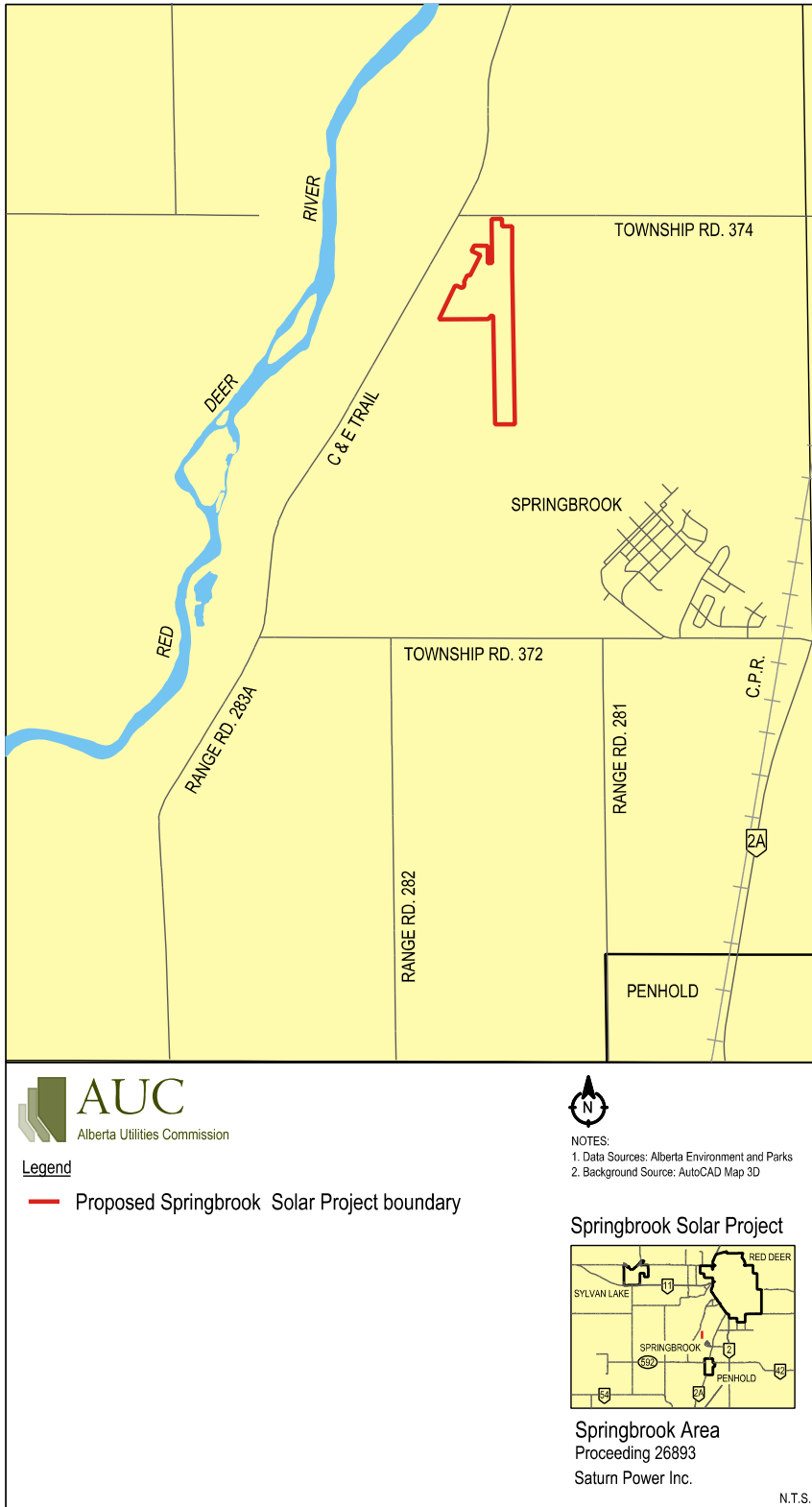
2. Saturn Power Inc. filed applications with the Commission for approval to construct and operate the power plant, and connect it to the FortisAlberta Inc. electric distribution system (collectively, the project). The project would consist of a solar photovoltaic power plant with an installed capacity of up to 20 megawatts.

3. The project would be sited on approximately 92 acres of cultivated land within Red Deer County, approximately 1.8 kilometres northwest of the hamlet of Springbrook. The project would be sited adjacent to the Red Deer Regional Airport on land owned by the airport and a private landowner. More specifically, the project would be located on the northwest, northeast and southeast quarters of Section 23, Township 37, Range 28, west of the Fourth Meridian as shown in Figure 1.

4. The project will require approximately 46,000 bifacial solar PV (photovoltaic) modules utilizing single axis tracker racking, up to 84 inverters, and eight transformers all enclosed in 4.4 kilometres of perimeter fencing. The equipment and project layout has not been finalized but will be located within the project boundary shown in Figure 1.

5. The project would be connected to FortisAlberta's 25-kilovolt distribution system in the northeast quarter of Section 23, Township 37, Range 28, west of the Fourth Meridian.

Figure 1. Springbrook Solar Project



6. Saturn Power's applications included:
- A participant involvement program summary, which details consultation with stakeholders within 800 metres of the project and notification to stakeholders within 2,000 metres of the project.
  - An environmental evaluation conducted by Dillon Consulting, which concluded that residual effects related to soil, surface water, groundwater and vegetation are unlikely to occur as a result of the project. The evaluation concluded that impacts on wildlife were expected but none would be considered significant.
  - An environmental protection plan prepared by Dillon Consulting, which included environmental protection and mitigation measures to be implemented during construction.
  - A conservation and reclamation plan prepared by Summit Liability Solutions Ltd. and a decommissioning plan prepared by Saturn Power. These documents were submitted in accordance with Alberta Environment and Parks' (AEP) *Conservation and Reclamation Directive for Renewable Energy Operations*.
  - A renewable energy referral report dated October 5, 2020, from Alberta Environment and Parks Fish and Wildlife Stewardship (AEP-FWS), which ranked the project to have an overall low risk to wildlife and wildlife habitat.
  - A *Historical Resources Act* approval from Alberta Culture and Status of Women dated August 27, 2021.
  - An emergency response plan prepared by Green Cat Renewables Canada Corporation that provides an outline of the processes and responsibilities for personnel in case of an emergency situation during construction or operation of the project.
  - A noise impact assessment, which concluded that the project would comply with Rule 012: *Noise Control*.
  - A solar glare analysis, which predicted that glare from the project is not likely to have the potential to create hazardous glare conditions for nearby dwellings, roads, flight paths or the air traffic control tower located at the Red Deer Regional Airport provided proposed mitigation techniques are implemented.
  - A statement from FortisAlberta indicating that FortisAlberta was prepared to connect the solar project to its distribution system pending final execution of an interconnection agreement.
  - A functional specification from the Alberta Electric System Operator, which set out the technical specifications related to the design, construction, development and commissioning of the project's connection with the Alberta Interconnected Electric System.

7. Saturn Power supplemented its applications with an approved aeronautical assessment form<sup>1</sup> completed by Transport Canada and a letter of non-objection from NAV CANADA for the project.<sup>2</sup>

8. The Commission issued a notice of applications to stakeholders including seven Indigenous groups: the Blood Tribe, Piikani Nation, Siksika Nation, Stoney (Bears paw) Band, Stoney (Chiniki) Band, Stoney (Wesley) Band and Tsuut'ina Nation.

9. In response to the notice, the Commission received two statements of intent to participate from Trans-Northern Pipeline Inc. (TNPI) and Brenda Carratt.

10. TNPI operates a high-pressure petroleum products transmission pipeline within a 50-foot right-of-way within the project boundary. TNPI indicated that it had no concerns but requested that Saturn Power contact TNPI prior to commencement of construction activities on, along or under the pipeline. In response to an information request, Saturn Power confirmed that it was aware of the TNPI facility and that it does not intend to construct where the pipeline is located nor does it intend to cross the right-of-way during construction or operation of the project.<sup>3</sup>

11. B. Carratt owns land adjacent to the project area. B. Carratt indicated that she was entirely opposed to the project and requested that the Commission deny the applications. In addition to a number of general concerns she had with solar power plants, including the belief that solar power plant technology is not yet affordable, efficient or environmentally friendly, she expressed specific concerns with the project. These specific concerns with the project included:

- Impacts to the environment and wildlife in the area noting the abundance of wildlife in the area due to the nearby Red Deer River.
- Removing quality agricultural land.
- Decreasing property value of nearby residences.
- Visual concerns.
- Sterilizing the area around the airport impacting potential future airport development.
- Concerns about the decommissioning and salvage of the project at the end of its life cycle including the removal of toxic materials.

12. The Commission granted standing to B. Carratt and scheduled a hearing to commence on May 25, 2022. On April 6, 2022, B. Carratt informed Commission staff that she would not be participating in the hearing. With no other parties having been granted standing, the Commission issued a notice of hearing cancellation on April 14, 2022.

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<sup>1</sup> Exhibit 26893-X0049, Springbrook Solar – Updated AAF, February 9, 2022.

<sup>2</sup> Exhibit 26893-X0060, NAV Canada – Land-Use Non Objection, April 27, 2022.

<sup>3</sup> Exhibit 26893-X0041, Springbrook IR Responses to AUC Round 1 – Final, Saturn Power-AUC-2021DEC03-002, PDF pages 2 and 3, December 14, 2021.

### 3 Discussion and Commission findings

13. The Commission is considering the applications under sections 11 and 18 of the *Hydro and Electric Energy Act*. These sections stipulate that no person can construct or operate a power plant or connect a power plant to the Alberta Interconnected Electric System without the Commission's approval.

14. In accordance with Section 17 of the *Alberta Utilities Commission Act*, the Commission must assess whether the project is in the public interest, having regard to its social, economic and environmental effects.

15. Although she did not wish to participate in a formal hearing process, the Commission acknowledges receipt of B. Carratt's statement of intent to participate, and did consider her concerns when making its decision.

16. For the reasons outlined below, the Commission finds that approval of the project is in the public interest having regard to the social, economic, and other effects of the project, including its effect on the environment.

#### 3.1 Rule 007 and participant involvement program

17. The Commission has reviewed the applications and has determined that sufficient information has been provided to meet the requirements specified in Rule 007: *Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations, Hydro Developments and Gas Utility Pipelines* such that the Commission is able to make a public interest determination on the project.

18. Saturn Power conducted a participant involvement program that included consultation with stakeholders located within 800 metres of the project boundary and notification to stakeholders within 2,000 metres of the project. The Commission is satisfied that Saturn Power's participant involvement program achieved the standards outlined in Rule 007.<sup>4</sup>

19. Saturn Power has not finalized the design or equipment for the project. Therefore the Commission imposes the following as a condition of approval:

- a. Once Saturn Power Inc. has finalized its equipment selection and project layout, it must file a final project update with the Commission to confirm that the project has stayed within the final project update specified allowances for solar power plants. The final project update must be filed at least 90 days prior to the start of construction.

#### 3.2 Environmental effects

20. The project area is located in the Central Parkland subregion of the Parkland Natural Region. The project is sited almost entirely on cultivated land (94 per cent cultivated, four per cent wetlands, two per cent treed windbreak). AEP-FWS identified the siting of the project as a low risk to wildlife and wildlife habitat as it does not impact native habitat, avoids

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<sup>4</sup> Saturn Power had initiated its participant involvement program prior to Rule 007 being amended. Rule 007 now requires consultation within 400 metres and notification within 800 metres.



named lakes and large permanent watercourses, and is not located within 100 metres of a valley or coulee break.

21. Saturn Power noted that the Red Deer Regional Airport operates a bird deterrence program to reduce the presence of birds in the area to maintain safety for aviation and bird species.

22. To avoid impacts to wildlife, Saturn Power has committed to a number of mitigation methods including:

- Installing all electrical collector lines and cables underground.
- Installing a perimeter security fence using straight lines and squared corners. The fence will be raised 15 centimetres from the ground to prevent brood separation or wildlife entrapment.
- Scheduling the removal of trees and shrubs during construction outside of the restricted activity period for breeding birds (April 1 to July 15).
- Scheduling operational vegetation management outside the restricted activity period for breeding birds.
- Having a qualified wildlife biologist conduct a nest survey if maintenance is required during the restricted activity period for breeding birds. If an active nest is found, appropriate measures will be implemented. These measures could include stopping the work and implementing a setback until the young have fledged or the nest becomes inactive.

23. AEP's *Wildlife Directive for Alberta Solar Energy Projects* (the Directive) includes a list of requirements (standards) and recommendations (best management practices). While the standards are expected to be met in the planning and development of solar energy projects, best management practices are "practices that may assist in the planning and location of activities. [Best management practices] are designed to inform the proponent of desired practices while planning and operating in Alberta. [Best management practices] are provided for information and consideration in the planning of solar energy projects to support better conservation and protection of wildlife and wildlife habitat."<sup>5</sup>

24. The project does deviate from the Directive's best management practice 200.2.2, which states that the proponent should avoid temporary water bodies and watercourses as defined by the *Alberta Wetland Classification System*.<sup>6</sup> As such AEP-FWS assessed the risk to wetland habitat as high risk despite the overall low risk to wildlife and wildlife habitat.

25. Saturn Power anticipates the removal of three seasonal and two temporary wetlands resulting in a total of 1.33 hectares of seasonal wetlands being removed. Saturn Power is required to receive *Water Act* approval for removal of these wetlands. Another seasonal graminoid marsh will have its 100-metre setback infringed upon by the project. Saturn Power had committed to alternative mitigation methods to reduce impacts to wetland and wildlife

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<sup>5</sup> *Wildlife Directive for Alberta Solar Energy Projects*, Alberta Environmental and Parks, PDF page 5.

<sup>6</sup> *Wildlife Directive for Alberta Solar Energy Projects*, Alberta Environmental and Parks, PDF page 9.

within the 100-metre setback. Given the high risk to wetland and wetland habitats, the Commission has determined that the alternative mitigation methods will be included as a condition of approval and therefore imposes the following condition:

- b. Within the 100-metre setback of the graminoid marsh, Saturn Power Inc. must:
  - Schedule vegetation disturbance outside of the nesting breeding bird period (April 1 to July 15).
  - Avoid travel and equipment movement during wet periods to minimize rutting and alteration of natural drainage patterns.
  - Use appropriate grading techniques to prevent increased runoff potential and maintain desired drainage patterns.
  - Put in place temporary dust, sediment and erosion control measures for the duration of the construction of the solar facility until reclamation and revegetation is completed. Areas surrounding these temporary control measures will be rehabilitated after construction. Rehabilitation measures may include adding topsoil with an appropriate seed mixture to control erosion and replace habitat to an equivalent land capability.

26. The Commission agrees with AEP-FWS's assessment that found the project represents an overall low risk to wildlife and wildlife habitat. While the project does deviate from the Directive with respect to wetlands, the Commission finds that the overall impacts to the environment are expected to be low. The Commission is particularly persuaded that the impacts will be limited in scope as a result of the project being located almost entirely on cultivated land.

27. To ensure that wildlife impacts are not excessive, Saturn Power has developed a post-construction monitoring and mitigation plan. A detailed report will be provided to AEP-FWS and the Commission annually. Should carcass surveys at any time exhibit high fatality numbers or fatalities of species at risk, Saturn Power must immediately notify AEP-FWS of the mortality event(s). Saturn Power has committed to operational adaptive management strategies related to wildlife disturbances. Should adaptive management be required, specific strategies will be developed in agreement with AEP-FWS.

28. The Commission finds that Saturn Power's post-construction monitoring and mitigation plan aligns with the Directive. The Commission is also satisfied that should wildlife mortality rates be unusually high, Saturn Power would be able to implement appropriate mitigation techniques in consultation with AEP-FWS.

29. Rule 033: *Post-approval Monitoring Requirements for Wind and Solar Power Plants* requires approval holders to submit to AEP and the Commission annual post-construction monitoring survey reports. Consequently, the Commission imposes the following condition of approval:

- c. Saturn Power Inc. shall submit a post-construction monitoring survey report to Alberta Environment and Parks (AEP) and the Commission within 13 months of the project becoming operational, and on or before the same date every subsequent year for which AEP requires surveys, pursuant to subsection 3(3) of Rule 033: *Post-approval Monitoring Requirements for Wind and Solar Power Plants*.

30. B. Carratt expressed concerns about the end-of-life disposal of materials used for the project. Saturn Power confirmed that all equipment and materials will be removed from the site for re-use or disposal and the site will be graded and restored to equivalent land capability as defined in AEP's *Conservation and Reclamation Directive for Renewable Energy Operations*. Although the salvage value of the metal and materials in the facility could cover up to 100 per cent of the decommissioning costs, Saturn Power has stated that it will be creating a reserve account during the power plant's last 10 years of operation to ensure sufficient funds are available to properly decommission and reclaim the site.<sup>7</sup>

### 3.3 Solar glare and operational safety

31. A solar glare assessment was conducted by Green Cat Renewables Canada Corporation. Green Cat identified 15 dwellings or groups of dwellings, three transportation routes, four flight paths and the air traffic control tower for the Red Deer Regional Airport as receptors. Modelling indicated that only a single receptor was expected to experience any glare as a result of the project. That receptor was labelled as flight path 4 and represented the southbound final descent approaching the Red Deer Regional Airport.

32. The assessment found that up to 7,036 minutes per year of yellow glare could be experienced at flight path 4 when evaluated with a 50 degree horizontal field of view and a five-degree backtracking angle. This modelling was intended to conservatively capture the potential glare a pilot may see while landing an airplane and was likely overestimating the amount of glare that would actually occur. The glare is predicted to occur from late October to mid-February and may be seen between 14:50 and 16:45 in the afternoon for up to 85 minutes a day. Further modelling indicated that the glare could be completely mitigated by implementing a minimum 12-degree backtracking limit on the glare producing arrays during the afternoons of late October to mid-February (the proposed solar glare mitigation). Saturn Power stated that it was committed to implementing the proposed solar glare mitigation.

33. On April 27, 2022, Saturn Power received a letter from NAV CANADA. The letter indicated that NAV CANADA had no objections to the project provided that Saturn Power mitigate the glare by implementing the proposed solar glare mitigation.

34. Saturn Power submitted with its application an aeronautical assessment form from Transport Canada dated July 30, 2020, which assessed an earlier iteration of the project. The assessment form stated that glare from solar panels was identified as a potential risk to aircraft and recommended the relocation of solar panels further away from airport runways.<sup>8</sup> Saturn Power received an updated aeronautical assessment form from Transport Canada on January 13, 2022, for the applied-for project layout. The updated assessment did not express concerns with solar glare or the location of project infrastructure, but did note that Saturn Power should consult with the Red Deer Regional Airport to ensure necessary information was provided for internal processes. Saturn Power stated that Transport Canada had clearly communicated to it that, however minimal the risk, in the event of a glare concern or question arising during project operation, action to remedy the concern must be taken.

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<sup>7</sup> Exhibit 26893-X0001 – Springbrook Solar Project – AUC Rule 007 Application, PDF page 13, October 1, 2021.

<sup>8</sup> Exhibit 26893-X0010 – Appendix 8 – Agency Approvals, PDF page 26, October 1, 2021.

35. Saturn Power stated that the Red Deer Regional Airport has been a partner and advocate for the project. The Red Deer Regional Airport provided a list of all airport tenants to Saturn Power. It was confirmed that these airport tenants received a copy of project-specific information packages issued to stakeholders in the area throughout consultation. Additionally, several airport tenants who were consulted indicated that they circulated project details with other pilots within their organization.

36. Saturn Power stated that it was understood that pilots, operators and owners of the airport were satisfied with Saturn Power's commitments to implementing the proposed solar glare mitigation. Other individuals who had also expressed concerns for pilot safety during the participant involvement program also had their concerns alleviated when provided with details of the proposed solar glare mitigation.

37. In response to an information request, Saturn Power noted that the solar glare report was based on preliminary project design. While the project boundary would not be altered, the final location and elevation of the solar panel modules are subject to change based on geotechnical assessments and detailed engineering. As a condition of approval, Saturn Power suggested that the Commission require that Saturn Power provide a final mitigation plan and confirmation that the final layout design would not be expected to result in solar glare for pilots on final approach to the Red Deer Regional Airport.

38. Saturn Power also retained Green Cat to prepare an emergency response plan. The plan was prepared to provide an outline of the processes and responsibilities for personnel in case of an emergency situation during construction or operation of the project. The emergency mitigation measures included a fire prevention plan, vegetation management plan and spill response plan.

39. The Commission is satisfied that by implementing the proposed solar glare mitigation and following the emergency response plan that the project is not expected to create a safety hazard. However, as the layout could change, the Commission agrees with Saturn Power's suggestion to include a condition of approval confirming that pilots would not be impacted by solar glare during the final approach to the airport. The Commission also notes that the predicted solar glare results were premised upon the use of an anti-reflective coating on the project's solar panels. Accordingly, the Commission imposes the following conditions of approval:

- d. Saturn Power Inc. shall use anti-reflective coating on the project solar panels.
- e. Saturn Power Inc. shall limit backtracking angles to a minimum of 12 degrees for the yellow glare-producing section of arrays in the afternoons (14:50-16:45 MST) between late October to mid-February.
- f. Prior to construction, Saturn Power Inc. must confirm that the final layout design would not be expected to result in solar glare for pilots on final approach to the Red Deer Regional Airport.
- g. Saturn Power Inc. shall file a report with the Commission detailing any complaints or concerns it receives or is made aware of regarding solar glare from the project during its first year of operation, as well as Saturn Power Inc.'s response to the complaints or concerns. Saturn Power Inc. shall file this report no later than 13 months after the project becomes operational.

### 3.4 Other considerations

40. Saturn Power retained Green Cat to conduct a noise impact assessment (NIA) for the project. The NIA indicated that major sound sources of the project power plant would be the eight medium voltage transformers and up to 84 inverters. Sound power levels of the project inverters and transformers were established based on manufacturer data and theoretical formulae. Predicted cumulative sound levels at noise receptors were compared with applicable permissible sound levels to assess the project's compliance with Rule 012. The Commission finds that the NIA submitted by Saturn Power meets the requirements of Rule 012 and accepts the conclusion of the NIA that noise from the project will comply with the permissible sound levels established by that rule.

41. B. Carratt and other individuals identified in the participant involvement program expressed concerns with the visual impacts of the project. In response, Saturn Power reduced the visual impacts by altering the layout of the project from its preliminary design. Originally, Saturn Power had planned to install solar panels 17 metres from Township Road 374 and 14 metres from Range Road 281. Saturn Power refined the layout prior to applying to the Commission by increasing these setbacks to 94 metres from Township 374 and 251 metres from Range Road 281. Saturn Power also committed to using existing and new vegetation to provide a visual screen for the project to reduce the visual impacts. The Commission finds that Saturn Power's proposal to limit the visual impacts of the project is reasonable. Given the concerns related to visual impacts the Commission will impose the following as a condition of approval:

- h. Saturn Power Inc. must use existing and new vegetation to provide a visual screen for the project to reduce the visual impacts.

42. In response to B. Carratt's concern about property value impacts, Saturn Power stated that there have been no conclusive findings which indicate that the installation of a solar facility on nearby properties negatively impacts resale values.<sup>9</sup>

43. Given the absence of evidence on the record, the Commission is unable to make a finding regarding the project's impact on property values.

44. With respect to B. Carratt's concern about the sterilization of the Red Deer Regional Airport, the Commission notes that the project is located in part on airport land and has been developed with the support of the Red Deer Regional Airport.

45. The Commission finds that the connection order application is in the public interest noting that FortisAlberta provided a letter of non-objection for the interconnection to Saturn Power.

46. For the reasons outlined above, and subject to all of the conditions that form part of this decision as set out and listed in Appendix A, the Commission finds that Saturn Power has satisfied the requirements of Rule 007 and Rule 012 and that in accordance with Section 17 of the *Alberta Utilities Commission Act*, approval of the project is in the public interest having

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<sup>9</sup> Exhibit 26893-X0053, AUC Correspondence - Hearing Format Request, PDF page 2, March 22, 2022.

regard to the social, economic, and other effects of the project, including its effects on the environment.

#### **4 Decision**

47. Pursuant to Section 11 of the *Hydro and Electric Energy Act*, the Commission approves Application 26893-A001 and grants Saturn Power Inc. the approval set out in Appendix 1 – Power Plant Approval 26893-D02-2022 to construct and operate the Springbrook Solar Project (Appendix 1 will be distributed separately).

48. Pursuant to Section 18 of the *Hydro and Electric Energy Act*, the Commission approves Application 26893-A002 and grants Saturn Power Inc. the approval set out in Appendix 2 – Connection Order 26893-D03-2022 to connect the Springbrook Solar Project to the electric distribution system of FortisAlberta Inc. (Appendix 2 will be distributed separately).

Dated on July 8, 2022.

#### **Alberta Utilities Commission**

*(original signed by)*

Carolyn Dahl Rees  
Chair

## Appendix A – Summary of Commission conditions of approval in the decision

This section is intended to provide a summary of all conditions of approval specified in the decision for the convenience of readers. Conditions that require subsequent filings with the Commission will be tracked as directions in the AUC's eFiling System. In the event of any difference between the conditions in this section and those in the main body of the decision, the wording in the main body of the decision shall prevail.

The following are conditions of Decision 26893-D01-2022 that require subsequent filings with the Commission and will be included as conditions of Power Plant Approval 26893-D02-2022:

- Once Saturn Power Inc. has finalized its equipment selection and project layout, it must file a final project update with the Commission to confirm that the project has stayed within the final project update specified allowances for solar power plants. The final project update must be filed at least 90 days prior to the start of construction.
- Saturn Power Inc. shall submit a post-construction monitoring survey report to Alberta Environment and Parks (AEP) and the Commission within 13 months of the project becoming operational, and on or before the same date every subsequent year for which AEP requires surveys, pursuant to subsection 3(3) of Rule 033: *Post-approval Monitoring Requirements for Wind and Solar Power Plants*.
- Prior to construction, Saturn Power Inc. must confirm that the final layout design would not be expected to result in solar glare for pilots on final approach to the Red Deer Regional Airport.
- Saturn Power Inc. shall file a report with the Commission detailing any complaints or concerns it receives or is made aware of regarding solar glare from the project during its first year of operation, as well as Saturn Power Inc.'s response to the complaints or concerns. Saturn Power Inc. shall file this report no later than 13 months after the project becomes operational.

The following are conditions of Decision 26893-D01-202 that do not require subsequent filings with the Commission:

- Within the 100-metre setback of the graminoid marsh, Saturn Power Inc. must:
  - Schedule vegetation disturbance outside of the nesting breeding bird period (April 1 to July 15).
  - Avoid travel and equipment movement during wet periods to minimize rutting and alteration of natural drainage patterns.
  - Use appropriate grading techniques to prevent increased runoff potential and maintain desired drainage patterns.
  - Put in place temporary dust, sediment and erosion control measures for the duration of the construction of the solar facility until reclamation and revegetation is completed. Areas surrounding these temporary control measures will be rehabilitated after construction. Rehabilitation measures may include adding topsoil with an

appropriate seed mixture to control erosion and replace habitat to an equivalent land capability.

- Saturn Power Inc. shall use anti-reflective coating on the project solar panels.
- Saturn Power Inc. shall limit backtracking angles to a minimum of 12 degrees for the yellow glare-producing section of arrays in the afternoons (14:50-16:45 MST) between late October to mid-February.
- Saturn Power Inc. must use existing and new vegetation to provide a visual screen for the project to reduce the visual impacts.