



September 16, 2015

Honourable Shannon Phillips  
Minister of Environment and Parks  
208 Legislature Building  
10800 - 97 Avenue  
Edmonton, AB T5K 2B6

Dear Minister Phillips:

Alberta's municipalities need your support in addressing the 1,700 brownfield sites that blight landscapes across the province, constraining economic development, creating health and safety risks and impairing environmental stewardship.

AUMA and AAMDC were pleased to collaborate with industry through a Brownfield Working Group that developed practical recommendations to require and enable brownfield redevelopment. Although these recommendations were submitted to the province in 2012, no significant action was taken despite extensive follow-up and support by working group members.

Many of the recommendations focus on addressing liability since it is the biggest barrier to redevelopment as property owners understandably want to ensure that their remediation efforts will satisfy requirements. Other provinces such as British Columbia and Nova Scotia have successfully implemented an effective remediation certification program, illustrating that definitive action by the province will lead to productive resolution of many of these sites. Expanding Alberta's existing remediation certification program to cover entire sites and providing a public registry of brownfield sites and abandoned wells will protect governments and current and future property owners.

Our associations would be pleased to work with the province and to use our relationship with industry to implement these recommendations. At a time of economic uncertainty and increased concern about the state of the environment, brownfield redevelopment provides an opportunity for the province to work with municipalities and industry to lead the way and be a model of success.

Sincerely,

Al Kemmere  
AAMDC President

Helen Rice  
AUMA President

Enclosures

Cc: Honourable Deron Bilous, Minister of Municipal Affairs and Service Alberta

## Brownfield Redevelopment Working Group: Recommendation Framework

The Work Group's Recommendations are organized into four clusters: **liability closure, financial incentives, coordination and education**, and **risk management and registration**.

The Working Group envisioned the acceptance of all recommendations as the best way to approach the brownfield strategy. However, the Working Group also recognized that there were several recommendations that will be the most effective in furthering brownfield development and should receive the highest priority for implementation. This section summarizes the Working Group priorities for implementation - more details are provided in chapter 8 of the group's report, *Practical Approaches to Achieve Productive Community Use*.

Liability closure was identified as being critical to the success of the strategy and the Working Group recommends that the two recommendations within this cluster be given the highest priority for implementation:

- #1 - Implementation of the Site-Based Remediation Certificate (SBRC), and
- #2 – Implementation of the No Further Action Certificate (NFAC)

Development of financial incentives was second in priority. The Working Group recommends that the highest priority be given to programs that are easy to access and that come in the early stages of site assessment and development. Therefore, the Working Group placed particular emphasis on:

- #3 - property tax cancellations, deferrals and reductions, and
- #4 - Environmental Site Assessment grants.

Coordination and education was seen as the third priority by the Working Group. Under this cluster, recommendation #7 - the establishment of a provincial Brownfield Coordinator Office - is recommended as the highest priority for implementation. While this recommendation was seen as important to ensuring ongoing program success, it was noted that unless higher priority recommendations are implemented, this office will have a limited role to play.

The remaining recommendations in the Risk Management and Registration cluster were regarded as important but of lower priority, namely:

- #5 – remediation grant where economics of development are marginal
- #9 – clarifying process for risk management plans
- #10 – registration of risk management plans on title
- #6 – grant to offset costs of preparing remediation, risk management plan
- #11 – require registration on a publicly accessible registry
- #8 – province wide education program for stakeholders

The recommendations for practical brownfield redevelopment are in the form of tools that can be combined or used on their own to address the requirements of specific brownfields. The tools address the primary barriers to redevelopment.