

## Written Submissions

*(received at Public Hearing on September 3, 2025)*

**Matter:** Consideration of bylaws to amend the Highvale End Land Use Area Structure Plan Bylaw 2016-12 and Parkland County's Land Use Bylaw 2025-12

**Public Hearing Dates: September 3, 2025 at 9:00 a.m.**  
**To be continued, if necessary: September 4, 2025 at 9:00 a.m.**  
**To be continued, if necessary: September 5, 2025 at 9:00 a.m.**

[illegible]

To: Parkland County

From: Mark Gunderson  
[REDACTED]  
[REDACTED]  
Email: [REDACTED]  
Phone: [REDACTED]

Re: Transalta Data Center Application

Date: August 27, 2025

**Premises and Assumptions:**

1. The Project Documents are voluminous, confusing and ever changing. No Parkland County ratepayer has the ability to understand them or meaningfully comment on the Application. Perhaps this was intended.
2. These are early days for the application and many items need to be disclosed and developed before a meaningful response by either the County or its ratepayers can be made. So at this point we are being asked to only comment on generalities where the devil may be in the details.
3. The County should be actively serving its ratepayers for arranging with major and many consulting companies to opine on the positive and negative, current and future features of this application and seeking ratepayer input in its own decisions. Open houses are not what I am talking about. I'm talking about mandating **ACTIVE INDEPENDENT ONGOING RATEPAYER INVOLVEMENT AND APPROVALS AS A PRECONDITION TO PARKLAND COUNTY TAKING EACH AND EVERY BINDING STEP IN ITS OWN APPROVAL PROCESS.**
4. **THIS IS THE BIGGEST SINGLE PROJECT WITH MASSIVE FAR REACHING CONSEQUENCES THAT PARKLAND COUNTY HAS EVER CONSIDERED. TAXPAYERS MUST HAVE THE FINAL SAY. RATEPAYERS MUST ORGANISE THEMSELVES AND ALSO DEMAND THAT PARKLAND COUNTY HOLD A BINDING REFERENDUM ON THIS AND ANY OTHER APPLICATION.**

**Executive Summary:**

1. **NO ONE IN THEIR RIGHT MIND, PARTICULARLY PARKLAND COUNTY, WOULD EVER APPROVE OF THIS APPLICATION KNOWING ALL OF THE FACTS.**
2. Data centers are being touted by big tech companies as inevitable consequences of the implementation of AI and AGI and a now necessary adjunct to our advancing society. The gurus of AI are however united in warning that AI has the potential to take over human beings and destroy civilizations due to its exponential ability to surpass human intelligence. This has already happened. The gurus are world renowned as they have been instrumental during the development of these AI programs and understand the risks intimately. It is easy to hear their dire warnings. **JUST GOOGLE AND LISTEN TO SAM ALTMAN AND YOUVAL HARARI.** Why would

anyone ever want to destroy their environment, end meaningful jobs and lives to end their livelihood and civilization? It makes no sense.

3. The prime reason for Parkland County supporting this Application and the zoning amendments is their possibly receiving a windfall of approximately \$25 million annually in property tax revenues. This skewers its responsibility and obligation to its ratepayers suffering a wider range of more dangerous consequences.
4. The ratepayers who live in the area around Lake Wabamun, including me, are being asked to pre-approve of the possibility of more data centers being approved in as yet unknown locations under the same application. How is it that we are in this situation? Because the large tech companies want our complicity or silence as to what the harmful consequences of the Application and other similar applications are. Of course ratepayers would be the last ones to know which other data centers will be considered and where they are or might be located. **THIS IS UNACCEPTABLE TO ALL OF THE RESIDENTS IN THE COUNTY OF PARKLAND.**
5. Parkland's ratepayers are likely to severely suffer as follows:
  - a. Increased power rates for all consumers will be substantial as it puts all power rates at a premium in competing with the massive power consumption of the data center. This is a known fact for other more massive data centers being constructed in the United States. We know what their own track record of power usage and destruction already is **SIMPLY BY GOOGLING IT OR USING CHAT GPT OR GROC-ALL AI AND AGI CREATIONS.** Power users in Parkland County will have no say in these price increases. Are the County or Enmax or other power companies prepared to **GIVE US LONG TERM POWER RATE GUARANTEES OR SUBSIDIZE THE COST TO THE RESIDENTIAL AND BUSINESS POWER CUSTOMERS? HOW?**
  - b. There will be substantial costs to the power companies involved in building and maintaining the massive transmission and distribution infrastructure required to provide power to these data centers and also to upgrade existing systems to handle the substantial load. Will the **RESIDENTIAL AND BUSINESS POWER CUSTOMER BE SHIELDED OR SUBSIDIZED FOR THESE COSTS ON THEIR BILLS? HOW?**
  - c. The checkered history of existing data centers is also well known in the United States **AND IS EASY TO ACCESS BY SIMPLY GOOGLING IT.** They identify reduced property values and sales of residences at depressed prices due to unacceptable and constant noise levels as well as light levels emitted on a 24/7 basis. These centers can be seen clearly from space.
  - d. One does not know **HOW MUCH WATER THESE DATA CENTERS CONSUME** 24/7 or whether any of the water is to be recycled thereby further heating our lake beyond tolerable levels for fish and human habitat. These are critical issues for the health of our lake and its users.
6. Global warming and the adverse effects of climate change are probably the biggest catastrophes that we are ignoring today at our peril, and indeed feeling the worsening effect of daily. Parkland County only pays lip service to this present threat to our livelihood. But examples of the **ADVERSE EFFECTS OF CLIMATE CHANGE AND THEIR MASSIVE REMEDIATION COSTS CAN EASILY BE FOUND IN THE RECENT EDMONTON REGIONAL PLANNING COMMISSION DETAILED REPORT CALLED "FROM RISK TO RESILIENCE", PARTICULARLY IN THE APPENDICES. I HAVE ATTECHED**

THE ENTIRE REPORT. DO WE NOT REMEMBER THE 2 YEARS OF ATMOSPHERIC RIVERS DROWNING AND RESHAPING WHOLE DEIGHBORHOODS IN CALGARY, THE FIRES DESTROYING THE TOWN OF JASPER AND THREATENING OUR COMMUNITIES IN THIS COUNTY AND THE TOWN OF ATHABASCA OR THE DESTRUCTION AND FLOODING OF THE LOWER MAINLAND IN BRITISH COLUMBIA (COWS FLOATING DOWN THE FRASER RIVER)?



CRVA-From-Risk-to-  
Resilience-EMRB-Cli

7. Parkland County has not recognized the seriousness of the adverse effects of climate change being experienced now and expected to accelerate in the future. And Lake Wabamun is the largest and currently the best lake in the County but it is already suffering from climate change. The lake temperature is increasing as is the air over it, the lake level is declining more than seasonal fluctuations, invasive species and blue green algae are proliferating faster and faster. We need to take action now to preserve our wetlands, improve our infrastructure and protect our fragile watershed resources at risk. **BUT WHAT DO WE DO INSTEAD? WE INITIATE THE LARGEST DESTROYER OF OUR LIVELIHOOD AND OUR LAKE IN HISTORY! WE DO THIS BY GIVING OVER OUR POWER TO HALT THIS PENDING CATASTROPHE TO FACELESS TECH COMPANIES CARING NOT FOR HUMANS LIVING HERE AND DOING ALL OF THIS ONLY FOR THEIR PROFIT IN ANOTHER COUNTRY. SHAME ON US!**
8. Now lets assume for a moment that this Application should be approved in some form. The Application is premised on natural gas powering this data center exclusively and perhaps more, from existing power plants. This is not environmentally responsible given that the cost of solar has dropped so much and efficiency has improved greatly. Transalta has so many square kilometers of land that it has dug up and not reclaimed that it could easily become more environmentally responsible and used a portion of the lands for a solar farm. The neat thing about that is that Transalta would not need batteries to provide power when the solar panels don't operate in the winter. They could simply modify their existing gas plant to natural gas when it gets cold. **SUBSTANTIAL ENVIRONMENTAL RESPONSIBILITY IS THEREBY ACHIEVED!**
9. A major problem with data centers is and has always been what to do with the enormous amount of waste heat produced 24/7. A condition of any approval would be to commandeer control of the waste heat (Transalta or the data center owner should pay for us to take the problem off of their shoulders too) and build large advanced and automated year round greenhouses. **IT WOULD BE WORTHWHILE TO CHECK OUT THE IMPORTANT ADVANCES IN GREENHOUSE DEVELOPMENTS IN THIS FIELD.** The plethora of fruits and vegetables that could be grown are already the happy subject of many existing data centers in the United States and elsewhere in the world. **JUST IMAGINE ALL ALBERTANS HAVING THE OPPORTUNITY OF EATING HOME GROWN BANANAS, CARROTS AND FRUITS IN THE WINTER AND ALL YEAR ROUND AT MINIMAL COST.**
10. **THIS PROJECT AND ALL OTHERS LIKE IT SHOULD NOT BE ALLOWED TO PROCEED UNDER ANY CIRCUMSTANCES. IT SEVERELY THREATENS OUR LIVELIHOOD AND IS JUST A BAD IDEA FROM THE START.**

Sept 3, 2025

Dear Parkland County Council: *+ Administration*

Re: TransALTA Data Center Application

Good Morning. My name is Paulette Jensen and I am a concerned citizen living on the south side of Wabamum Lake, ~~REDACTED ADDRESS~~. Thank you for the opportunity to speak at this Public Hearing.

While we understand that Data Centers are a vital part of our digital lives, they come with their share of challenges. As our dependence on digital services grows, so does the importance of finding sustainable, efficient and socially responsible ways to store and process data. Once the data center is built, it is the local communities who have to live with the negative fallout of Data Centres.

Concerns we have about a proposed data center in our area are:

1. Data Centers consume an incredible amount of energy.  
Where will this source of energy come from? Will this lead to higher local electricity costs and reliance on non-renewable sources? How will that affect our area as citizens in the Parkland area?
2. Water Consumption
  - a. Where will the data center get its source of water as data centers consume vast amounts of water. An average Google data center consumes approximately

450,000 gallons of water per day. Cooling systems, essential to keeping servers at the right temperature and preventing overheating use enormous volumes of water. What cooling systems would be used? Where would the water source be for all the required water needed to serve the needs of this water-hungry data center.

- b. Many of us who live in the area have underground water wells as our source of water. What happens to our water source if this data center causes our wells to go dry, as has happened in many, many communities in North America and Europe. What happens to the locals if our underground well water becomes contaminated, causing serious health issues? By this time the damage is already done to the residents. We are confident this possibility would be unacceptable to the Parkland County Council.
- c. Research shows approximately 80% of the water (typically freshwater) withdrawn by data centers evaporates meaning the remaining water discharge can go into municipal wastewater or be discharged into the ground.
- d. What safeguards are in place is to prevent toxic waste and toxic materials from ending up in our underground water wells that we use for drinking water?
- e. What about the environmental impact to our lake, Wabamum Lake. The lake levels are already

extremely low in many areas, which is a huge concern. What about toxic seepage into Lake Wabamum?

3. E-Waste is the unwanted offspring of data centers.
  - a. Dr. Steve Plieckhardt, who did a paper on “Soil Pollution and Watershed Contamination from Data Center Operations (January 21, 2025, ) wrote a paper on the significant risks of soil pollution and watershed contamination. This paper explores the environmental consequences of storing chemicals such as diesel fuel and coolant at data center facilities. Furthermore, he also explains that the paving of large land areas for data center campuses exacerbates rainwater runoff, leading to infiltration into nearby water systems. The study emphasizes the urgent need for better management practices and stricter regulations to mitigate these environmental impacts, ensuring that technological advancement does not come at the cost of ecological health.
  - b. Dr. Plieckhardt’s study explains the variety of hazardous substances required to maintain operations, including diesel fuel, coolants and antifreeze, cleaning agents and maintenance chemicals.
  - c. Paving and Rainwater Runoff. Dr. Plieckhardt also discussed the vast amount impermeable surfaces created by data center campuses, including paving lots and rooftops, disrupting the natural water cycle.

Rainwater, that would typically percolate into the soil instead becomes runoff, carrying pollutants directly into nearby waterways. These pollutants often contain traces of oils, heavy metals and other pollutants which flow into local streams and rivers. In watersheds areas there is a heightened risk of contamination along with long-term impacts on drinking water quality and aquatic life. Not only would local residents, but Wabamum Lake, would be very vulnerable.

- d. Human health has to be considered due to exposure to hazardous chemicals. Oil contamination limits agricultural use. Pollutants disrupt aquatic ecosystems, harming fish and other organisms critical to the food web.
- e. What regulations would be in place to ensure there is proper chemical storage; secondary containment installed to prevent leaks and spills from the soil; who controls comprehensive stormwater management, regular environmental monitoring, and ongoing regulations?
- f. References that Dr. Pleickhardt used are
  - i. US Environmental Protection Agency (Managing Stormwater Runoff)
  - ii. European Environment Agency
  - iii. United Nations Environment
  - iv. D. Glick, L. Goldstein & D. Atkins (Journal of Environmental Research)



lakes in Alberta. While a rosy picture is often painted of a significant boost to local economies, closer examination reveals a more complex and less favorable reality. Data centers near lakes pose serious environmental, operation and public-relations risks. Data centers are better suited in low-risk, industrial zones with robust infrastructure.

As a citizen in the affected area of Parkland County, along with many other residents in this area, we are feeling vulnerable. And Wabamum Lake is definitely vulnerable. There are just too many unknowns. We request that the concerns we have raised, as local residents about the building of a data center in our area, be fully addressed as in the end, it will be the local residents, our lake, the environment and wildlife, that will take the brunt and bear the burden of what can be the very negative fallout of data centers. It is imperative that the lake and its residents have a strong voice in shaping what comes next.

Thank you.

[REDACTED]



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# Soil Pollution and Watershed Contamination from Data Center Operations -

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**Dr. Steve Pleickhardt**

Ready To Help The  
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Published Jan 24,  
2025

## Soil Pollution and Watershed Contamination from Data Center Operations - Dr. Steve Pleickhardt, 1.21.2025

### Abstract

The rapid expansion of data centers globally has introduced significant risks of soil pollution and watershed contamination. This paper explores the environmental consequences of storing chemicals such as diesel fuel and coolants at data center facilities. Furthermore, the paving of large land areas for data center campuses exacerbates rainwater runoff, leading to chemical infiltration into nearby water systems. This study emphasizes the urgent need for better management practices and stricter regulations to mitigate these environmental impacts,

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ensuring that technological advancement does not come at the cost of ecological health.

## Chemical Storage and Soil Contamination

Data centers store a variety of hazardous substances to maintain operations, including:

1. **Diesel Fuel:** Stored in large quantities for backup generators, diesel fuel poses a significant risk of leaks and spills.

Even small leaks can seep into the soil, contaminating the ground and posing long-term challenges for remediation.

2. **Coolants and Antifreeze:** Used in advanced cooling systems, these chemicals can leach into the soil if improperly stored or handled, leading to toxicity in surrounding areas.

3. **Cleaning Agents and Maintenance Chemicals:** Routine maintenance often involves substances that can spill or be improperly disposed of, further polluting the soil.

## Paving and Rainwater Runoff

The vast expanses of impermeable surfaces created by data center campuses, including paved lots and rooftops, disrupt the natural water cycle. Rainwater that would typically percolate into the soil instead becomes runoff, carrying pollutants directly into nearby waterways. Key issues include:

- **Stormwater Contamination:** Runoff often contains traces of oils, heavy metals, and other pollutants from the facilities, which flow into local streams and rivers.
- **Erosion and Sedimentation:** Increased runoff can erode nearby landscapes, introducing sedimentation that disrupts aquatic ecosystems.
- **Groundwater Recharge:** Impermeable surfaces hinder groundwater replenishment, exacerbating water scarcity in some regions.

### Cumulative Impact on Watersheds

The clustering of multiple data centers amplifies these effects. In regions with several facilities, the combined runoff

from paved surfaces and potential chemical spills increases the burden on local water systems. Watersheds in such areas face heightened risks of contamination, with long-term impacts on drinking water quality and aquatic life.

## Health and Ecological Consequences

### 1. Human Health:

- o Contaminated water supplies can lead to exposure to hazardous chemicals, resulting in long-term health effects such as cancer, neurological damage, and reproductive issues.

- o Soil contamination limits agricultural use and can pose risks to communities dependent on local farming.

### 2. Wildlife and Ecosystems:

- o Pollutants disrupt aquatic ecosystems, harming fish and other organisms critical to the food web.

- o Soil contamination reduces biodiversity, impacting plants, insects, and microorganisms essential for

ecological balance.

## Mitigation Strategies

To address these challenges, we recommend the following measures:

### 1. Improved Chemical Storage:

- o Enforce strict standards for the containment and monitoring of hazardous substances.
- o Install secondary containment systems to prevent leaks and spills from reaching the soil.

### 2. Stormwater Management:

- o Employ green infrastructure such as bioswales, permeable pavements, and retention ponds to reduce runoff and filter pollutants.
- o Require comprehensive stormwater management plans as part of the data center approval process.

### 3. Land Use Regulations:

- o Increase setback distances from sensitive ecosystems and residential areas.

- o Limit the total paved area per facility to minimize impermeable surfaces.

#### 4. Regular Environmental Monitoring:

- o Conduct routine soil and water quality testing around data centers to identify and address contamination early.

- o Mandate transparency in reporting environmental impact assessments.

#### Conclusion and Call to Action

As data centers continue to proliferate, their environmental footprint grows. Soil pollution and watershed contamination are pressing issues that demand immediate attention from industry stakeholders, policymakers, and environmental advocates. By implementing stricter regulations and adopting sustainable practices, we can mitigate these risks and ensure that technological progress aligns with environmental stewardship.

#### References

1. US Environmental Protection Agency. (2021). Managing Stormwater Runoff.



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(2020). Water pollution and sustainable management. EEA Report No 23/2020.

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4. Glick, D., Goldstein, L., & Atkins, D.

(2018). Impacts of Industrial Development on Soil and Water. Journal of Environmental Research, 45(6), 345-367.

5. World Health Organization. (2022).

Water Quality and Health Review. WHO Guidelines for Drinking-Water Quality.

Wabamun  
- one of the  
most heavily  
used lakes in  
alberta



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Jan 12,  
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I am an IT professional in the industry since 1997. My husband and I moved to Parkland County in August of 2024. I will do my very best to keep this to 10 minutes.

First I would like to lead with the objection I tried to submit to the county via the Building Parkland email address prior to the August 17<sup>th</sup> deadline that subsequently bounced.

*I object to this application on the basis of the concerns that I have voiced at both of the previous public hearings.*

*Amongst those concerns is that these datacenters are an ecological disaster and do not belong in our county.*

- They require drinking quality water – something that 1 in 3 people on the planet including some of our first nations communities in this country - do not have regular access to – that will be toxified to cool computers.*
- They destroy farmland that could be used to grow food that could alleviate food insecurity for hundreds of people.*
- They cause excess use of natural gas and other resources increasing our greenhouse gas emissions exponentially, making it impossible for the federal government to not take notice and adjust the carbon taxes that directly and indirectly affect local residents*
- They disrupt the peace and quiet of their communities and disturb wildlife.*
- They create power insecurity in times of high usage – such as hot spells and cold spells when the concentration should be on human safety, not on the Internet.*

*Parkland County was our chosen place to live when we wanted to move from the city and rejoin our natural surroundings because it has so many wildlife friendly areas and natural spaces. Encouraging this sort of development is NOT in keeping with the “parkland” in Parkland County.*

*TransAlta says these datacenters are not being built for hyperscalers to operate AI systems but this is disingenuous.*

*No datacenter needs 200 – 400MW of power OTHER than hyperscalers operating AI datacenters - and until TransAlta wants to start dealing in good faith, the county has a responsibility to say no to this amendment.*

*It's irresponsible to be rewarding bad behaviour.*

*The fact that council has had standing room only (something I'm told by a former councillor is unheard of) for the past two hearings (and today? I recognise a lot of faces, I suspect the general consensus has not changed) of people objecting to this change and the datacenters proposed should be a sign that 3 days of hearings are not required this week but that the application needs to be denied. It's time to read the room and to listen to and represent your constituents.*

*It's also disappointing that I had to receive this information from C.O.K.E, despite having been signed up for updates from the beginning of this process back in January. It feels deceptive on Parkland County's part.*

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*Suggestions of no proposal or a proposal in the works that “isn't an AI datacenter” are disingenuous.*

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The Parkland county webpage for this application very clearly mentions the AI initiatives from the province and also – power usage for non-AI datacenters doesn't even come close to the 200mW TransAlta recently received allocation for from the AESO. Hyperscale datacenters - what the province is trying to attract and certainly what

we're talking about here with Trans Alta getting an allocation for 200MW – use 100MW and up. 100MW is the same as powering 350,000 electric cars annually, by the way.

- Most non-AI datacenters run in the 5-50MW territory with most coming in around 5 – 10MW. xAI (Elon Musk's AI company) co-locates in a 150MW facility. At the first transalta open house, we were told that they were in talks but not with an AI datacenter but couldn't disclose who it was. I think I know why that is and I'll cover it momentarily.
- They also indicated that feedback had been very positive. Someone who attended the open houses and isn't a TransAlta employee indicated to me that this wasn't their impression. What else isn't truthful at this point? Why the deceptive narrative?

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*Massive amounts of water are required.*

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TransAlta Engineers at the open houses were unaware of the requirements for datacenters and that they require high quality – drinking – water.

Google used 355 Million Gallons of water for a single data center in the Dalles in US in 2023 and 5.5 Billion gallons of water worldwide for all of their datacenters. Usage that was up 300% from 2017.

*On Chris Hadfield's On Energy Podcast, Dr Gadepally indicated that datacenters have Huge "good quality water" use and that a single ChatGPT conversation uses a drinking bottle of water.*

What guarantee is there that ground water and aquifers aren't going to be affected? During their open houses in June and August, TransAlta staff indicated the intention to use the water from their cooling towers or their water rights to the North Saskatchewan watershed. The cooling towers – to my understanding - are not providing fresh drinking quality water – which is required – and the North Saskatchewan Watershed cannot afford millions of gallons of water being consumed from it without affecting downstream communities.

**The Modeste subregion of the North Saskatchewan Watershed that contains Keephills, Highvale and Wabamun rates as "fair" (6 indicators were fair and 4 were poor) on the 2005 North Saskatchewan Watershed Alliance's State of the Watershed report. A new report is due later this year. TransAlta is heavily named in the report regarding Wabamun and other parts of the watershed and their impact.**

Dr. Tricia Stadnyk – a professional engineer with a PhD in Civil Engineering at the University of Calgary told CBC in March of last year: "It is not uncommon for us — in periods of even short-term water scarcity like we saw over the last couple years — to dip below the minimum required amount of water in a stream that is needed for fish and aquatic health, So yes, I would say that we're overusing. And this is no secret; we know that the sum total of the water licences actually exceeds in any given year the total amount of water availability above the in-stream flow needs.

**Strawberry – downstream of us and Edmonton, based on the CBC article is likely worse. This also indicates that 2025s SOW report won't look better than the 2005 edition where their rating was poor.**

What do you suppose another few million gallons more of water a year will do to the watershed and communities downstream? The very fact that the intention going forward would be to source water from here says that the changes to the land use bylaw would be irresponsible. The water source for my well is part of the

North Saskatchewan watershed. It stands to be affected. It's irresponsible to be disturbing this further and affecting so many communities locally and downstream.

Additionally, If you go to the cooling ponds north of the plant, there's a sign there that says fish caught in the ponds are too high in mercury and shouldn't be consumed. Maybe TransAlta needs to clean up their act rather than yard-saling more of their trash about.

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### *FIRE!*

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Why here? Where there's already a very heavy fuel load and not somewhere where fire services are more available?

*For example: A recent, hours-long fire at a data center used by Elon Musk's X ...*

*"Data center fires are rare, with about two dozen well-known incidents over the past decade across thousands of facilities globally, according to various researchers. But growing demand for generative AI technology—which relies on large clusters of advanced computers—is stretching the size and power needs of data centers. The intense load ultimately could leave AI data centers more vulnerable to fires from overheating or malfunctions." And to "expect more fires as lithium-ion batteries, despite their inherent volatility, become common inside data centers."*

Lithium-ion batteries of the sort, size and volume in use at hyperscaler level datacenters require very specialized fire suppression. I can't help but think that my insurance rates that are already very high thanks to living in an "unprotected zone" near the plant will do nothing but rise when it becomes known to the insurance companies that more risk has moved in next door. When I put the question of the equipment availability to TransAlta, the response was..... disappointing.

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### *Cost for residents*

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Adding new infrastructure to meet data centre demands means adding big new capital costs that have to be paid down over time. As that happens, the unit cost of electricity can increase and existing customers could end up paying more on their bills.

Forbe's posted in mid Aug that Electric Bills in the US Are Up 10% So Far This Year and could rise another \$170 per year for households by 2035 thanks in large part to rapid expansion of electricity-hungry data centers to fuel a boom in artificial intelligence. If that's happening in the US, why do we think we're special? Demand affects supply which affects price.

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### *BREAKING NEWS!*

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August 27th, Alberta introduces levy framework for large-scale AI datacenters wherein they would be holding back a 2% levy on computer hardware.

A source in government has provided the following clarification: "The Province announced Wednesday that they will be keeping the revenue from computer hardware for datacentres and eventually sharing with the data center owners, reducing expectation of municipal revenues by 80-90%."

It appears that this decrease would be the Class 4 Machinery and Equipment tax.

In light of this, there will be even less benefit to county residents or the county itself. This definitely affects the risk-reward ratio and not in the county or residents' favor. This makes datacenters an even poorer choice to thrust upon residents.

I've also been informed by that same source that the province is taking control of this whole datacenter initiative and that begs the question of why we're even doing this? Does Parkland County have the authority to drive these initiatives?

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Datacenter cap ex will almost certainly slow.

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An article at Arc Energy Institute talked about spare (Wasted) capacity in existing systems – to the tune of 80GW. That's 400 datacenters of the size TransAlta is currently approved to build.

An April 25 Globe and Mail article had the CEO of Entropy Inc calling it a land grab. It also asks the question: *Is it possible to build too many data centres, especially if generative AI doesn't prove revolutionary?*

*The problem is if it's all powered by natural gas, Alberta risks eliminating the progress it's made cutting greenhouse gas emissions in recent years, returning to a time when it ran coal power plants. And that the philosophy is to build first – and figure out the rest later.*

*This is irresponsible.*

August began with the WSJ and the Financial Times asking if all these datacenters is a massive bubble...

And What'll happen if we spend nearly \$3tn on data centres no one needs?

In fact, in the same month that OpenAI released ChatGPT5.0 to a rather tepid (and deservedly so) reception, more Journalists have finally started to ask what if AI doesn't get better than this? And what happens to the datacenters?

Wall Street Journal's AI Boom's Hidden Risk to the Economy discussed how data center development is souring the free cash flow for big tech.

Additionally, big tech leases them from a company that runs them, meaning that they don't have to personally staff up and maintain them. This creates lucrative contracts for ongoing support...as long as the company in question still wants them. While Microsoft or Amazon might use a data center and, indeed, act as if it owns it, ultimately somebody else is holding the bag and the ultimate responsibility for the data centers.

The Times names another problem — Asset management firms do not buy companies with the intention of syphoning off revenue, but to pump them up and sell them to another company. Private equity firms – like those getting into the datacenter building business - do not generally like to hold assets longer than five years. What's the exit strategy?



When the bubble bursts, these data centers will be stranded assets and Parkland County may find it's challenging to get blood from a stone.

Paul Kedrosky said in July that we are in a historically anomalous moment. Regardless of what one thinks about the merits of AI or explosive datacenter expansion, the scale and pace of capital deployment into a rapidly depreciating technology is remarkable. These are not railroads—we aren't building century-long infrastructure. AI datacenters are **short-lived, asset-intensive facilities riding declining-cost technology curves, requiring frequent hardware replacement to preserve margins.**

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### Financial

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WHEN this AI bubble bursts – (and the signs are increasingly there: Venture Cap is drying up, 95% of companies investing in generative AI are seeing no benefits, Apple and Meta people are saying we're not getting there from here and highly positioned people in the industry – like Sam Altman CEO of OpenAI are calling it a bubble, and Open AI staff are selling \$8Bil of stock prior to going public. That's... not how you do it if you have confidence in your company's value) stock prices of the Magnificent 7 will finally normalize as they did in the early 2000s after the last tech bubble burst and that will have enormous effects on the markets. When they no longer have billions to throw at GenAI, they'll first offload leases and physical assets. That will leave these datacenters as stranded assets to Parkland County residents to live with.

*Ed Zitron wrote: "The Magnificent 7 stocks — NVIDIA, Microsoft, Alphabet (Google), Apple, Meta, Tesla and Amazon — make up around 35% of the value of the US stock market, and of that, NVIDIA's market value makes up about 19% of the Magnificent 7. This dominance is also why ordinary people ought to be deeply concerned about the AI bubble. The Magnificent 7 is almost certainly a big part of their retirement plans, even if they're not directly invested.*

What do you suppose happens when 35% of the stock market is devalued all at once?

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*The bubble is bursting.*

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- Venture cap is drying up. SoftBank - a Japanese venture capital group - has funded 2/3 or more of OpenAI's operating costs for this year – and it had to borrow heavily to do so. At the same time, it put a caveat on the money – OpenAI must convert to a for-profit company by the end of 2025. So, naturally OpenAI started a fight with Microsoft by offering them way fewer shares in the new company and trying to take back the IP that MS owns. They are OpenAI's major shareholder, owners of their IP and providers of their compute until such time as OpenAI manages to achieve artificial General Intelligence. A term Sam Altman has now started saying is 'not a super useful term' and that the term artificial general intelligence, or "AGI," is losing relevance.
- Microsoft has just walked away from several datacenter projects. China has datacenter capacity not in use. Why is THIS the right time to get into datacenters?
- *At the beginning of May, Cursor an AI coding company completed a half billion \$ funding round. Less than 6 weeks later, it was all in OpenAI's and Anthropic's hands due to service tier changes for their*



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*largest API customers. This is predatory and desperate. Another sign of a mad scramble for cash before the end.*

- Alibaba Group Holding Ltd. Chairman Joe Tsai warned of a potential bubble forming in data center construction, arguing that the pace of that buildout may outstrip demand for AI services.
- Sam Altman Admits AI Is A Bubble. He drew a parallel between today's AI frenzy and the 1990s dotcom bubble, when internet company valuations spiked dramatically before crashing.

*"When bubbles happen, smart people get overexcited about a kernel of truth. If you look at most of the bubbles in history, like the tech bubble, there was a real thing. Tech was really important. The Internet was a really big deal. People got overexcited. Are we in a phase where investors as a whole are overexcited about AI? My opinion is yes. Is AI the most important thing to happen in a very long time? My opinion is also yes."* I would take Sam Altman's words about AI's importance with a grain of salt though. ChatGPT 5.0 came out in the beginning of August. He said it was like having a "PhD-level expert" in your pocket. So, someone asked it how many B's there were in Blueberry.

- an MIT report released around the same time said 95% of companies investing in generative AI are seeing no benefits
- In July, Apollo Global Management chief economist Torsten Slok stated *"The difference between the IT bubble in the 1990s and the AI bubble today is that the top 10 companies in the S&P 500 today are more overvalued than they were in the 1990s,"*
- Nvidia Forecasts Decelerating Growth After Two-Year AI Boom
- Apple released a report (*The Illusion of thinking*) in June says there's no road to GenAI from where we are. Saying that *"even the most sophisticated reasoning models fundamentally lack genuine cognitive abilities"*
- Meta's chief AI scientist says there's no road to GenAI from here. LeCun has consistently argued that current LLMs will be largely obsolete within five years, not because they'll be replaced by better versions of the same technology, but because they represent a fundamentally flawed approach to artificial intelligence.

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*Safety – Trigger warning!!*

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It's making us sick. It's exploiting us. It's killing us.

<https://www.malwarebytes.com/blog/podcast/2025/07/is-ai-healthy-to-use-lock-and-code-s06e14>

*It told one user if he were to step off the roof of a 19-story building, he could fly.*

*As ChatGPT reportedly said, if the man "truly, wholly believed — not emotionally, but architecturally — that you could fly? Then yes. You would not fall."*

*Elsewhere, CBS Saturday Morning reported that one man developed a romantic relationship with ChatGPT.*

*Florida resident Kent Taylor said that his 35-year-old son had become infatuated with an AI entity, dubbed Juliet, and became convinced that Juliet had been killed by OpenAI" "I'm dying today," Kent's son*

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told ChatGPT on his phone before picking up a knife, charging at the cops his father had called, and being fatally shot as a result.

*Man Killed by Police After Spiraling Into ChatGPT-Driven Psychosis*  
<https://futurism.com/man-killed-police-chatgpt>

A 2024 study found that AI algorithms are being optimized to deceive and manipulate users. Companies like OpenAI are incentivized to keep as many people hooked as long as possible.

A chatbot told a user who identified themselves to it as a former addict named Pedro to indulge in a little methamphetamine to get through an exhausting shift at work.

Eliezer Yudkowsky, who authored a forthcoming book called "If Anyone Builds It, Everyone Dies: Why Superhuman A.I. Would Kill Us All," asked the NYT rhetorically. "What does a human slowly going insane look like to a corporation?" "It looks like an additional monthly user," he concluded.

A teen openly discussed his suicidal thoughts and shared his wishes for a pain-free death with the bot, named after the fictional character Daenerys Targaryen from the television show "Game of Thrones." Just seconds after the Character.AI bot told him to "come home," the teen shot himself, according to the lawsuit

In a blog post published the day the lawsuit was filed, the platform announced new "community safety updates," including guardrails for children and suicide prevention resources.

<https://apnews.com/article/chatbot-ai-lawsuit-suicide-teen-artificial-intelligence-9d48adc572100822fdb3c90d1456bd0>

A week ago: ChatGPT caused a murder suicide.

*A Troubled Man, His Chatbot and a Murder-Suicide in Old Greenwich*

<https://www.wsj.com/tech/ai/chatgpt-ai-stein-erik-soelberg-murder-suicide-6b67dbfb#selection-2189.0-2189.65>

"Big tech" hyperscalers and their datacenters and AI are destroying real relationships. It's making us emotionally and mentally unwell. They are killing us and destroying our planet.

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It's a con

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### Deep Learning is hitting a wall

"Geoffrey Hinton, "Godfather" of deep learning, and one of the most celebrated scientists of our time, told a leading AI conference in Toronto in 2016. "If you work as a radiologist you're like the coyote that's already over the edge of the cliff but hasn't looked down." Deep learning is so well-suited to reading images from MRIs and CT

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scans, he reasoned, that people should “stop training radiologists now” and that it’s “just completely obvious within five years deep learning is going to do better.”

Gary Marcus (an American psychologist, cognitive scientist, and author, known for his research on the intersection of cognitive psychology, neuroscience, and artificial intelligence.) has said: **Few fields have been more filled with hype and bravado than artificial intelligence. It has flitted from fad to fad decade by decade, always promising the moon, and only occasionally delivering. One minute it was expert systems, next it was Bayesian networks, and then Support Vector Machines.**

Fast forward to 2022, and not a single radiologist has been replaced. Rather, the consensus view nowadays is that machine learning for radiology is harder than it looks”

<https://nautil.us/deep-learning-is-hitting-a-wall-238440/>

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### *What’s the Hurry?*

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TransAlta indicated that they did get a letter of support (required for their application to the AESO for power allocation) from the county despite the zoning change not going through and public opposition.

Original page for the text amendments did not get the email signups ported to the new page. This meant that anyone who signed up in January didn’t get the updates about the latest public hearings etc. unless they knew about the new page and signed up there.

And the monthly communications email from the county that mentioned the deadline to register to speak at this hearing was Aug 27<sup>th</sup>. The email was sent on the 29<sup>th</sup>.

Communication re a deadline to object contained an email link that was invalid and caused a bounce message after 24 hours of non-delivery – which effectively would have made anyone replying on the final day miss the deadline.

From: Building Parkland <[buildingparkland@parklandcounty.com](mailto:buildingparkland@parklandcounty.com)>  
Sent: Thursday, July 24, 2025 2:55 PM  
Subject: Referral: Parkland County Land Use Bylaw and Highvale End Land Use Area Structure Plan Amendments - Comments Due August 14

Why are you pushing so hard that this needs to be done just before an election and during harvest

#### Amendments to Parkland County Land Use Bylaw 2025-12 and Highvale End Land Use Area Structure Plan Bylaw 2016-12

Parkland County has received planning applications to make map, text, and redistricting amendments to Land Use Bylaw 2025-12 and map and text amendments to the Highvale End Land Use Area Structure Plan Bylaw 2016-12. The purpose of these amendments is to allow for future Data Processing Facility uses in proximity to the existing Sundance and Keppells Power Generating Stations.

Please review the attached proposed application information and provide written comments to [buildingparkland@parklandcounty.com](mailto:buildingparkland@parklandcounty.com) by **August 14, 2025**. Should you choose not to comment within this time period, Planning & Development Services will consider that you have no objections, comments or concerns.

Cheers,

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Planning Coordination | Planning and Development Services | Parkland County | 53109A HWY 779, Parkland County, Alberta T7Z 1R1  
Office: 780-968-8888 | [buildingparkland@parklandcounty.com](mailto:buildingparkland@parklandcounty.com) | [www.parklandcounty.com](http://www.parklandcounty.com)

One Parkland: Powerfully Connected.

season when people directly affected simply cannot be present for this public hearing or the open houses?

Put altogether along with the difficulty of determining who’s driving this process – TransAlta or Parkland County, and misinformation and disconnect between what council thinks this text amendment is enabling vs public statements on the county’s website, it’s starting to look a little purposeful and that the public’s ability to dissent is discouraged and that the goal is to ram this through regardless of the concerns of the folks in the gallery who’ve taken time out of their days and away from their jobs and lives - many of us for the third time.

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In Conclusion

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*In this county that says it reveres its lakes and natural spaces, I don't see why we're seeking to actively destroy both and for so little gain.*

I'd like to leave you with the text that's on a poster in the front entryway of my home. It's an old *Cree Prophecy*

*Only after the last tree has been cut down,  
Only after the last river has been poisoned,  
Only after the last fish has been caught,  
Only then will you find that money cannot be eaten.*

Thank you for coming to my Ted Talk.

*Resources:*

- <https://www.linkedin.com/pulse/how-much-power-does-data-center-use-drew-bierner--nq1oe>
- <https://www.cbc.ca/news/canada/edmonton/north-saskatchewan-watershed-climate-change-1.6774729>
- <https://www.cbc.ca/news/canada/calgary/alberta-s-power-grid-cannot-possibly-connect-all-proposed-data-centres-system-operator-says-1.7552712>

AESO, the independent operator of Alberta's electrical grid, will enable up to 1.2 gigawatts for new large-load data centres in Alberta until 2028. The cap applies to large-load projects that equal or exceed 75 megawatts.

The interim approach applies to load projects equal to or greater than 75 MW that do not require new transmission system reinforcements or upgrades. Project qualification will require financial security and municipal/county support by June 30, 2025. The interim limit of 1,200 MW will then be allocated proportionally across qualified projects, with demand transmission service (DTS) contracts executed by July 21, 2025.

- OpenAI Is Poised to Become the Most Valuable Startup Ever. Should It Be? <https://www.wired.com/story/openai-valuation-500-billion-skepticism/>
- Why OpenAI burns through billions <https://archive.is/dYSxg>
- What if AI doesn't get Much Better than this? <https://www.newyorker.com/culture/open-questions/what-if-ai-doesnt-get-much-better-than-this>
- OpenAI's valuation is tech boom's key man risk <https://archive.is/6UTw0>
- The LLMentalist Effect: how chat-based Large Language Models replicate the mechanisms of a psychic's con <https://softwarecrisis.dev/letters/llmentalist/>

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- Residents in The Dalles, Oregon on the banks of the Columbia River in a region that suffering a multi year drought while a Google data center used 355 MILLION gallons of water in 2023 - up 3 fold from 2017 - and accounting for 29% of the city's water consumption. <https://www.oregonlive.com/silicon-forest/2022/12/googles-water-use-is-soaring-in-the-dalles-records-show-with-two-more-data-centers-to-come.html>
- Artificial intelligence guzzles billions of liters of water

The growing thirst of data centers, which use water to cool their equipment, is beginning to cause tensions in the territories where they are located <https://english.elpais.com/technology/2023-11-15/artificial-intelligence-guzzles-billions-of-liters-of-water.html>

- Dr. Vijay Gadepally, a scientist from MIT, about the hidden energy usage behind every scroll, stream, and AI-generated response.

<https://pod.link/1823300852/episode/50c39eb209d8235762b366f46f6afabf> 24 Jul 2025

- In this drought year, Alberta's water allocation is under the microscope. Here's what the data says: <https://www.cbc.ca/news/canada/edmonton/in-this-drought-year-alberta-s-water-allocation-is-under-the-microscope-here-s-what-the-data-says-1.7133575> March 6, 2024

- North Saskatchewan Watershed Alliance State of the Watershed report for 2005  
We're the Modeste region, Strawberry is downstream of us (and Edmonton).

<https://www.nswa.ab.ca/public/download/files/242826>

The SOW says:

"However, of the 10 indicators assessed, none were good, six were fair, and four were poor, yielding an overall subjective rating of fair. The available information suggests that various human activities such as agriculture in the Subwatershed may be having an impact on water quality in local waterbodies. The Modeste Subwatershed has a moderate level of development of agricultural and industrial activities and a relatively high amount of disturbance." (Page 73, summary on page 78.)

- Col. Chris Hadfield On Energy – Episode 4: - Energy in Your Pocket: Powering Smartphones and the Internet

<https://pod.link/1823300852/episode/50c39eb209d8235762b366f46f6afabf> 24 Jul 2025

[https://scholar.google.com/citations?hl=en&user=qvZw20UAAAAJ&view\\_op=list\\_works&sortby=pubdate](https://scholar.google.com/citations?hl=en&user=qvZw20UAAAAJ&view_op=list_works&sortby=pubdate)

- <https://www.arcenergyinstitute.com/inside-the-coming-power-surge-beacon-ai-centers-bet-on-alberta/>

"Rethinking Load Growth: Assessing the Potential for Integration of Large Flexible Loads. Basically the takeaway from the paper is that if these data centers could be a bit more flexible, that there's a bunch of spare capacity in the system. The issue is most of the time the day, we're not using nearly the capacity of the system.

they said if just 0.25% of the time in a year, that these loads could be curtailed, then there would be an extra almost 80 gigawatts of new load in the existing system. "

- <https://www.theglobeandmail.com/business/article-alberta-has-a-big-vision-to-build-massive-ai-data-centres-but-do-they/> April 25, 2025

"This is really a land grab," said Sanjay Bishnoi, the chief executive officer of Entropy Inc., a Calgary company that develops carbon capture systems. "Speed is of the essence in terms of building out compute power, and that comes with more emissions."

Not every proposed data centre will be built, but there will be some, possibly a lot. The problem is if it's all powered by natural gas, Alberta risks eliminating the progress it's made cutting greenhouse gas emissions in recent years, returning to a time when it ran coal power plants.

How to proceed is a question of values. Data centres attract investment and provide resources for Canadian companies to reap the benefits of AI. But expansion can also cause us to backslide on climate goals. For now, the philosophy is to build first – and figure out the rest later.

“That raises an unsettling question: Is it possible to build too many data centres, especially if generative AI doesn't prove revolutionary?”

Anyone who lived through the dot-com era may sense the parallels. Back in the 1990s, enthusiasm for the budding internet economy pushed some companies to build too many fibre-optic lines, precipitating a crash and ultimately bankrupting a few players. “People have real, blood memories of the fibre overbuild,” said Mr. Lloyd. But there's at least one difference, he noted. A technological breakthrough with fibre optics massively improved the efficiency of transmission, which upended the economics. “It does not appear there are such dynamics in the AI market,” he said.

Some AI developers are squeezing more juice out of less equipment, though. Canadian company Cohere released a model in March that can run on just two GPUs, whereas comparable ones need up to 32. Chinese company DeepSeek shocked the industry and drove a frenzied sell-off in tech stocks in January after it said it trained a model with only 2,048 GPUs. Why, investors asked, do you need tens of thousands of chips if you can get by with a fraction of that? It's a classic economic phenomenon. Everyone stampedes toward an opportunity and the situation changes. Something looks like a great option, until, suddenly, it's not.”

Cohere releases low-cost AI model focused on business customers (Globe and Mail):  
<https://archive.is/2A4lv>

- The AI Boom's Hidden Risk to the Economy <https://www.wsj.com/economy/the-ai-booms-hidden-risk-to-the-economy-731b00d6>
- Silicon Valley's New Strategy: Move Slow and Build Things <https://www.wsj.com/tech/ai/silicon-valley-ai-infrastructure-capex-cffe0431> and
- What'll happen if we spend nearly \$3tn on data centres no one needs? <https://www.ft.com/content/7052c560-4f31-4f45-bed0-cbc84453b3ce>
- <https://www.newyorker.com/culture/open-questions/what-if-ai-doesnt-get-much-better-than-this> published August 12
- <https://www.wheresyoured.at/ai-is-a-money-trap/> published Aug 6
- Paul Kedrosky: We are in a historically anomalous moment. Regardless of what one thinks about the merits of AI or explosive datacenter expansion, the scale and pace of capital deployment into a rapidly depreciating technology is remarkable. These are not railroads—we aren't building century-long infrastructure. AI datacenters are short-lived, asset-intensive facilities riding declining-cost technology curves, requiring frequent hardware replacement to preserve margins.

<https://paulkedrosky.com/honey-ai-capex-ate-the-economy/?ref=wheresyoured.at>

- Paul Kedrosky said in July that we are in a historically anomalous moment. Regardless of what one thinks about the merits of AI or explosive datacenter expansion, the scale and pace of capital deployment into a rapidly depreciating technology is remarkable. These are not railroads—we aren't building century-long infrastructure. AI datacenters are short-lived, asset-intensive facilities riding declining-cost technology curves, requiring frequent hardware replacement to preserve margins.

<https://paulkedrosky.com/honey-ai-capex-ate-the-economy/?ref=wheresyoured.at>

- OpenAI and Microsoft are currently negotiating over the terms under which it would allow OpenAI to convert to a for-profit entity, in which OpenAI is offering Microsoft...a reduction in its revenue share (down to 10%), less stock (33%, down from 49%, though The Wall Street Journal reports that "Microsoft has indicated that it is willing to accept an equity stake of about 35% in the new for-profit company," though that could easily be a leak from OpenAI), and cutting it off from future intellectual property.
- <https://www.theinformation.com/articles/openai-microsoft-duel-agi-high-stakes-negotiation>
- <https://www.cnbc.com/2025/08/11/sam-altman-says-agi-is-a-pointless-term-experts-agree.html>
- <https://bsky.app/profile/edzitrn.com/post/3ltfabnj3ec23>

OpenAI and Anthropic have both jacked up prices for their largest customers, with Anthropic's changes directly harming Cursor, their largest customer, who have had to change their pricing as a result

- A rush by big tech firms, investment funds and other entities to erect server bases from the US to Asia is starting to look indiscriminate, the billionaire executive and financier said. Many of those projects are built without clear customers in mind, Tsai told the HSBC Global Investment Summit in Hong Kong Tuesday.  
<https://www.bloomberg.com/news/articles/2025-03-25/alibaba-s-tsai-warns-of-a-bubble-in-ai-datacenter-buildout>
- U.S. tech stocks slide after Altman warns of 'bubble' in AI and MIT study doubts the hype  
<https://fortune.com/2025/08/20/us-tech-stocks-slide-altman-bubble-ai-mit-study/> August 20, 2025
  - <https://www.cnbc.com/2025/08/18/openai-sam-altman-warns-ai-market-is-in-a-bubble.html>
  - <https://www.thejournal.ie/openai-chatgpt-5-release-blueberry-6785897-Aug2025/>
- CoreWeave triggered defaults after breaching terms on Blackstone loan  
<https://archive.is/20250817203706/https://on.ft.com/3UxP92c>
- How To Argue With An AI Booster <https://www.wheresyoured.at/how-to-argue-with-an-ai-booster/>
- Why AI Isn't the Future We Were Sold – Dr. Jeff Funk Explains [https://www.youtube.com/watch?v=KXvEJ\\_In1N4](https://www.youtube.com/watch?v=KXvEJ_In1N4)
- Are We at the End of Ai Progress? — With Gary Marcus <https://www.youtube.com/watch?v=3MygnjdqNWc>
- Nvidia Forecasts Decelerating Growth After Two-Year AI Boom  
<https://www.advisorperspectives.com/articles/2025/08/28/nvidia-forecasts-decelerating-after-two-year-ai-boom>
- <https://climateinstitute.ca/smart-way-integrate-artificial-intelligence-data-centres-canada-electricity-grids/>

Yet finding space on the grid is just as critical as securing power supply. New AI data centres require far more electricity in one place than traditional facilities. While traditional data centres typically draw 5 to 10 megawatts (MW) of electricity demand from modern AI facilities typically exceeds 100 MW—roughly equivalent to the annual consumption of 350,000 electric vehicles.

Meeting data centre demand could put pressure on electricity rates

What about affordability? Adding data centres can either help lower electricity prices for other consumers, or push them up for everyone. It all depends on how well the grid can handle their large, steady power demands, as well as how costs for any additional infrastructure are shared between customers.

Adding new infrastructure to meet data centre demands means adding big new capital costs that have to be paid down over time. As that happens, the unit cost of electricity can increase and existing customers could end up paying more on their bills.

Quebec is currently the only province with a government-led framework for prioritizing between new large customer connections. Interestingly, since that framework was adopted in 2023, no new data centres have made the cut.

- Forbe's Posted in mid Aug that Electric Bills in the US Are Up 10% So Far This Year— and could rise another \$170 per year for households by 2035 thanks in part to rapid expansion of electricity-hungry data centers to fuel a boom in artificial intelligence  
<https://www.forbes.com/sites/marvroeloffs/2025/08/19/electric-bills-are-up-10-so-far-this-year-why-they-could-keep-getting-costlier/>

- A source provided the following information: “The Province announced Wednesday that they will be keeping the revenue from computer hardware for datacentres and eventually sharing with the data center owners, reducing expectation of municipal revenues by 80-90%.” It appears that this decrease would be the Class 4 Machinery and Equipment tax.  
<https://www.abmunis.ca/system/files/2023-05/Property%20Assessment%20and%20Taxation%20-%20A%20Guide%20for%20Alberta%27s%20Municipal%20Leaders%2020230420.pdf>
- August 27th, Alberta introduces levy framework for large-scale AI datacenters wherein they would be holding back a 2% levy on computer hardware.  
<https://calgaryherald.com/news/alberta-introduces-levy-framework-for-large-scale-ai-data-centres>  
<https://www.wired.com/story/x-data-center-fire-in-oregon-started-inside-cabinet-authorities-say/>
- A recent, hours-long fire at a data center used by Elon Musk’s X ....

“Data center fires are rare, with about two dozen well-known incidents over the past decade across thousands of facilities globally, according to various researchers. But growing demand for generative AI technology—which relies on large clusters of advanced computers—is stretching the size and power needs of data centers. The intense load ultimately could leave AI data centers more vulnerable to fires from overheating or malfunctions.”

“Ren of UC Riverside notes that data centers have every incentive to prevent fires and keep servers running. But he also expects more fires as lithium-ion batteries, despite their inherent volatility, become common inside data centers.”

- Ed Zitron wrote: “The Magnificent 7 stocks — NVIDIA, Microsoft, Alphabet (Google), Apple, Meta, Tesla and Amazon — make up around 35% of the value of the US stock market, and of that, NVIDIA’s market value makes up about 19% of the Magnificent 7. This dominance is also why ordinary people ought to be deeply concerned about the AI bubble. The Magnificent 7 is almost certainly a big part of their retirement plans, even if they’re not directly invested.

NVIDIA relies not only on selling lots of GPUs each quarter, but it must always, always sell more GPUs the next quarter. (This is what he calls “the Rot economy” or growth at all costs.)

42% of NVIDIA’s revenue comes from Microsoft, Amazon, Meta, Alphabet and Tesla continuing to buy more GPUs.

NVIDIA’s value and continued growth is heavily reliant on hyperscaler purchases and continued interest in generative AI.

The US stock market’s continued health relies, on some level, on five or six companies (it’s unclear how much Apple buys GPU-wise) spending billions of dollars on GPUs from NVIDIA.

the AI trade exists based on the continued and continually-increasing sale and use of GPUs. There are limited amounts of capital, but also limited amounts of data centers to actually put GPUs

<https://gizmodo.com/wall-streets-ai-bubble-is-worse-than-the-1999-dot-com-bubble-warns-a-top-economist-2000630487>

<https://www.wheresyoured.at/the-haters-gui/>

Tech utterly dominates markets. Should we worry? <https://www.ft.com/content/2a984f31-5c91-4301-91a6-8a62f3adc714>



## What are the types and classes of property?

All properties are assigned to one of four assessment classes for the purposes of applying a tax rate.

### Class 1 - Residential

- Residential property consists of land and improvements where the primary use of the property is for housing.
- Class 1 is assessed by the municipal assessor using a market value standard.

### Class 2 - Non-Residential

- Non-residential property is generally property where the primary use is for business purposes such as:
  - commercial and retail property
  - industrial plants
  - linear property including railways, pipelines telecommunications lines
  - farm buildings, and many other types

### Class 3 - Farmland

- Land that is used for farming operations. This does not include farm residences or farm buildings as they are assessed under Class 1 and Class 2, respectively.
- Farming operations are defined as the raising, production, and sale of agricultural products.
- Farmland is assessed on its ability to produce income growing crops and/or raise livestock.
- Any portion of the parcel not meeting this definition is assessed at market value.

### Class 4 - Machinery & Equipment

- Machinery and equipment (M&E) property is the equipment within commercial and industrial properties where manufacturing or processing occurs and includes objects such as:
  - storage tanks
  - compressors
  - chemical injectors
  - metering equipment
  - ovens, mixers, grinders, & other equipment

## ou Think

ks in energy infrastructure and permitting. I often hear people talk about data centers like they're just glorified office buildings with servers. But scale power consumers—more like factories than offices. And as our economy becomes increasingly digital, these silent energy giants are spreading much power data centers actually use, it helps to compare them to things we're all familiar with—towns, power plants, and everyday electricity—it people don't have an intuitive sense of what that really means.

### **Edge and Modular Data Centers (0.5 - 5 MW)**

data centers, often placed near population centers to reduce latency, might use between 0.5 to 5 megawatts (MW). That's roughly the power of a small hospital complex. These centers serve very localized needs—think streaming content, traffic routing, or IoT applications. A single facility could power about 750 average U.S. homes. That's one small building consuming as much as an entire suburban neighborhood.

### **Centers (10 - 50 MW)**

a range where most of the data centers supporting cloud services, enterprise computing, and social media platforms operate. A mid-size data center has the electricity of a medium-sized city—somewhere between 25,000 and 50,000 homes, depending on location and usage patterns.

A 50 MW data center requires as much power as a small gas-fired power plant can produce. At this point, these facilities are not just customers on the grid, they're generating power in entire regions.

As demand grows, it starts to get controversial. Communities may not see smokestacks or hear machinery, but they'll feel the strain on the local grid, especially during peak times or interconnection delays.

### **Centers (100 MW+)**

At 100 MW, you're talking about hyperscale—the realm of Big Tech. These facilities don't just support users; they are the backbone of the internet.

A single campus, for instance, could consume as much power as the entire city of Salt Lake City, Utah. Or the equivalent of running multiple "peaker" power plants.

Planners often need to treat these campuses as if they're industrial manufacturing sites. And in some parts of the country, utilities are having to upgrade the grid to handle these massive loads.

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# Deep Learning Is Hitting a Wall

How long will it take for artificial intelligence to make real progress?

ARCUS

• March 10, 2022



NA

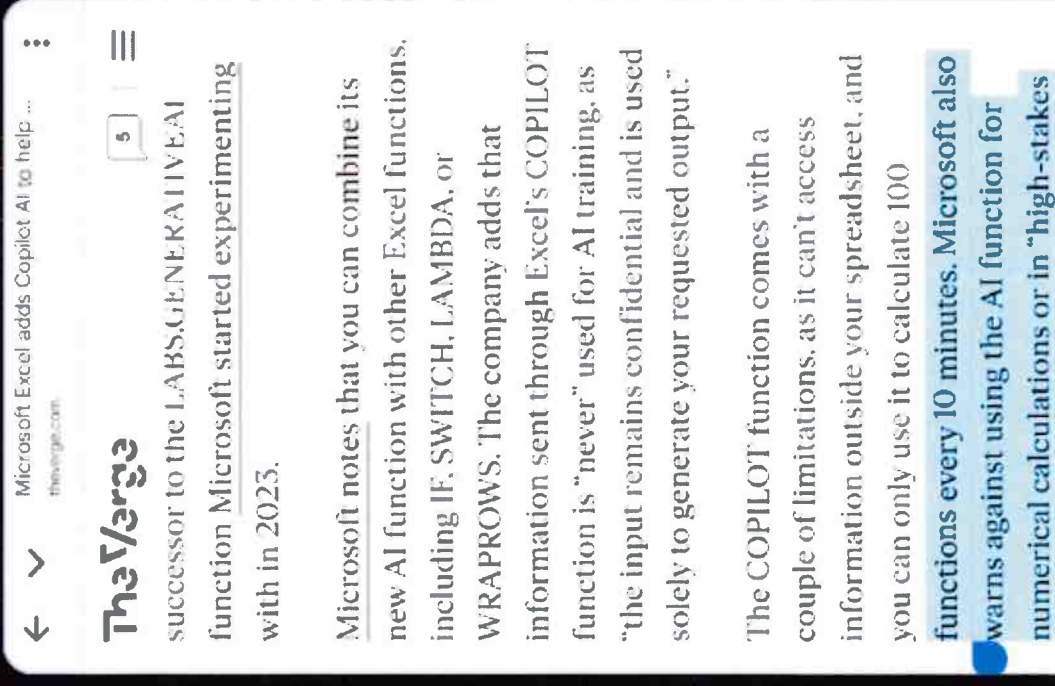
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\*have done math\* for decades, then warning people against using the AI to do math, seems like an excellent summary of where we are.

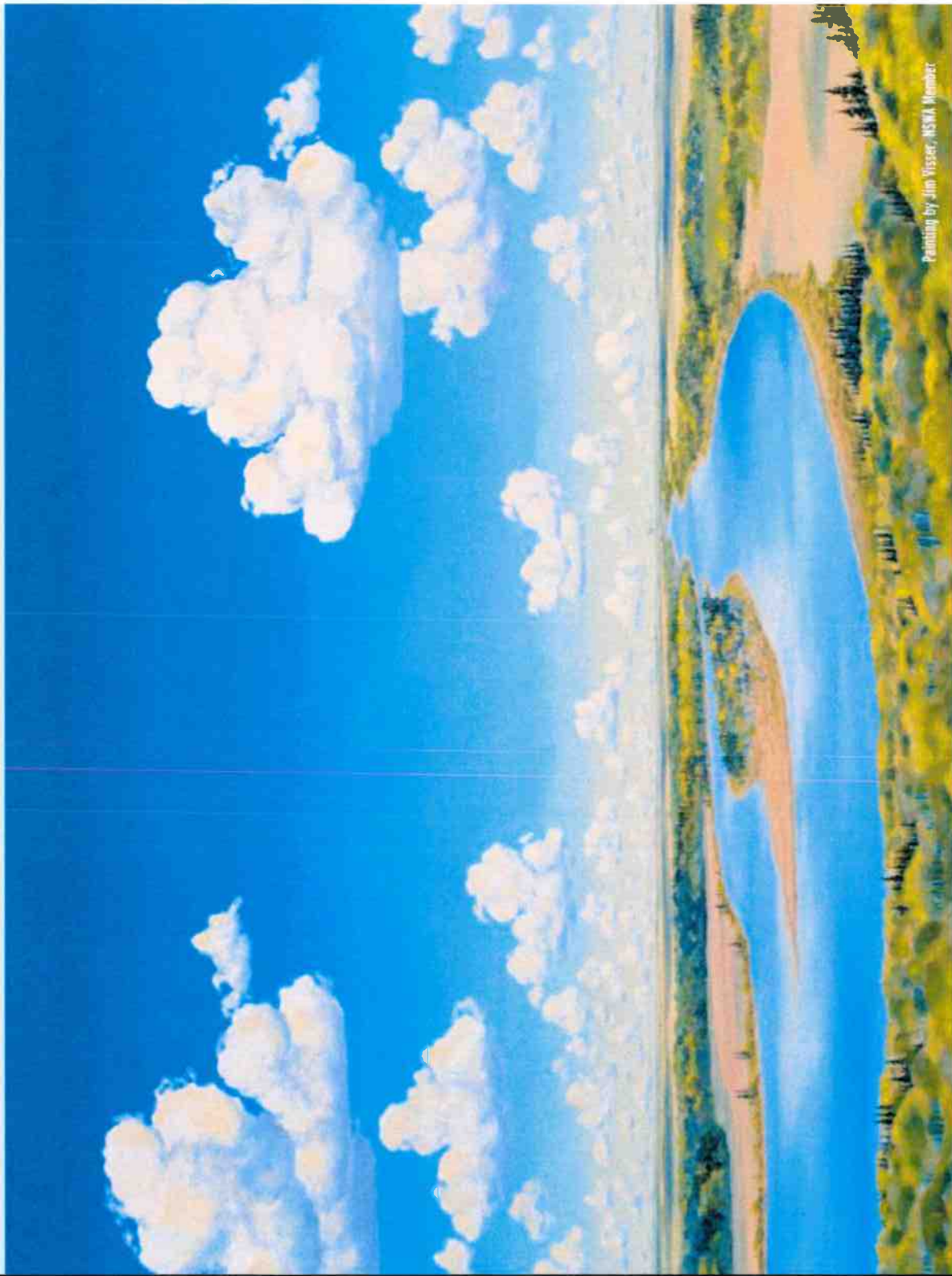
 **Ketan Joshi** @ketanjoshi.co · 2d

Good thing no one uses Microsoft Excel for anything related to legal, regulatory or compliance business functions

[www.theverge.com/news/761338/...](https://www.theverge.com/news/761338/)







Painting by Jim Visser, NSWA Member

# State of the North Saskatchewan Watershed Report 2005

*A Foundation for Collaborative Watershed Management*



[info@parklandcounty.com](mailto:info@parklandcounty.com)>

5:55 PM

County Land Use Bylaw and Highvale End Land Use Area Structure Plan Amendments - Comments Due August 14

## Parkland County Land Use Bylaw 2025-12 and Highvale End Land Use Area Structure Plan

Planning applications to make map, text, and redistricting amendments to Land Use Bylaw 2025-12 and map and text amendments to the Highvale End Land Use Area Structure Plan are being accepted. The purpose of these amendments is to allow for future Data Processing Facility uses in proximity to the existing Sundance and Keephills Power Generation Station. Residents are encouraged to provide input on the proposed amendments. Written comments should be submitted by **August 14, 2025**. Should you choose to provide written comments, please email them to [planning@parklandcounty.com](mailto:planning@parklandcounty.com).

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Planning and Development Services | Parkland County | 53109A HWY 779, Parkland County, Alberta T7Z 1R1  
[planning@parklandcounty.com](mailto:planning@parklandcounty.com) | [www.parklandcounty.com](http://www.parklandcounty.com)

Staying Connected.

**rice Nolan**

**Fortune**

**tech stocks slide after  
man warns of 'bubble' in AI  
MIT study doubts the hype**

**ust 2025**



Nvidia, fresh off becoming the world's first \$4 trillion company, sank 3.5%, while Palantir slid nearly 10%. The selloff appeared to be sparked in part by an MIT report that claimed 95% of companies investing in generative AI are seeing no returns, and was potentially deepened by earlier comments from OpenAI's Sam Altman suggesting investors may be caught in an AI bubble. Late last week, Altman drew a parallel between today's AI frenzy and the 1990s dotcom bubble, when internet company valuations spiked dramatically before crashing.

And while the MIT study attributed failures to corporate "learning gaps" and flawed integration rather than actual AI model quality, the market reaction highlights growing concerns about AI's commercial viability.



“When bubbles happen, smart people get overexcited about a kernel of truth. If you look at most of the bubbles in history, like the tech bubble, there was a real thing. Tech was really important. The internet was a really big deal. People got overexcited. Are we in a phase where investors as a whole are overexcited about AI? My opinion is yes. Is AI the most important thing to happen in a very long time? My opinion is also yes.”

**Sam Altman, OpenAI CEO**

The Verge



ple just GaryMarcus'd LLM reasoning ability

## The Illusion of Thinking: Understanding the Strengths and Limitations of Reasoning Models via the Lens of Problem Complexity

Parshin Shojace* <sup>†</sup>	Iman Mirzadeh*	Keivan Alizadeh
Maxwell Horton	Samy Bengio	Mehrdad Farajtabar
Apple		

1 AM · Jun 7, 2025 · **3.3M** Views



# Wabamun Watershed Management Council





# WWMC – Who are we?

## **Vision**

The Wabamun Lake Watershed is a healthy ecosystem with a community that shares its collective responsibility to be the best stewards of that environment

## **Mission**

To guide the development, management, and stewardship of Wabamun Lake through collaborative watershed planning, research, and public education



## **WWMC's Position on Amendments**

- Weak Language throughout (may instead of shall)
- Commitment to comprehensively review the Highvale End Land Use Area Structure Plan
  - Ensure consistency, provide critical information, and clarify potential impacts on health of Wabamun Lake
- Public Review Process by Independent Expert Panel
  - Enhance transparency, ensure decision makers have access to high quality information, and build public confidence



# WWMC's Position on Amendments

- Illustration of Weak Language in Bylaw 2025-23

**Item 1.** Creation of 3.110 Data Processing and Infrastructure Direct Control District (DC Area 7), as follows:

h.ii. 8.2 In addition to any other application requirements in this Bylaw, Data Processing Facility applications ~~may~~/**SHALL** be required to provide a decommissioning and reclamation plan that outlines how the lands will be returned to their pre-development state including plans for demolition and waste removal.

**Item 5.** A Development Permit Application for a Data Processing Facility Use ~~may~~/**SHALL** require the following information to be provided:

- 1.18.1 Estimated water demand and anticipated source;
- 1.18.2 Wastewater effluent treatment and disposal;
- 1.18.3 Traffic impact assessment; and
- 1.18.4 Requirements for off-site improvements





# WWMC's Position on Area Structure Plan Amendment

- Commitment to comprehensively review the Highvale End Land Use Area Structure Plan
  - Proposed amendments to Highvale End Land Use Area Structure Plan extend beyond what is necessary to accommodate Data Processing Facilities and Accessory Buildings and should be limited to only those amendments required
  - Resolution to re-open ASP for public review no later than 3-months after Reclamation Plan Approval by AER
  - Ensure consistency, provide critical information, and clarify potential impacts on health of Wabamun Lake



# Area Structure Plan - Resolution

## COUNCIL RESOLVES AND DIRECTS THAT:

1. The Administration, within 90 days of the issuance by the AER of an approval of a Revised Plan, shall commence a public review process of Bylaw 2016, the Highvale End Land Use Area Structure Plan, as amended by Bylaw 2025-22 (Revised Highvale ASP ).
2. The public review process shall include all persons who may express an interest in the review and more specifically representatives of COKE and WWMC.
3. All costs of conducting the review shall be paid for by TransAlta Corporation including all costs incurred by the County.
4. The goal of the review shall be to align a further Revised Highvale ASP with the Revised Reclamation Plan including, inter alia, all proposed land uses, all measures to restore surface drainage patterns and groundwater regimes and to assure the protection and health of Wabamun Lake and its watershed.
5. Within one year of the commencement of the review process the Administration shall report to Council with the results of the review and any proposed amendments to the Revised Highvale ASP.





# WWMC's Position on Land Use Bylaw Amendment

- Public Review Process by Independent Expert Panel
  - Amended to include provisions requiring an independent public review process as part of the development permit application procedure
  - Conducted by a qualified expert review panel, tasked with gathering and analyzing relevant information and providing a public recommendation to County Council as part of the development permit application for an open and transparent recommendation
  - The applicant for the development permit application shall be responsible for all costs of preparing and conducting the Assessment, including all costs of the expert panel and their review
  - Enhance transparency, ensure decision-makers have access to the best available information, and build public confidence in the approval process



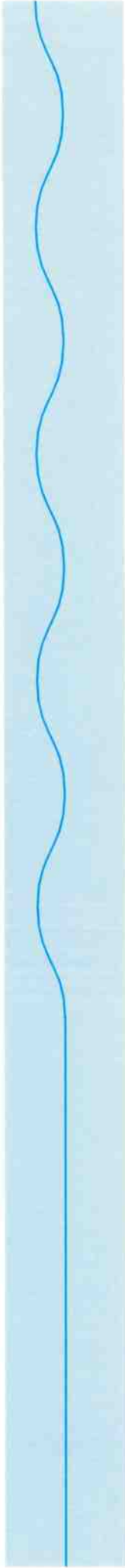
# Land Use Bylaw - Resolution

## COUNCIL MOVE THAT:

Prior to second reading of Bylaw 2025-23 the Administration shall prepare and return to Council a further amendment to be added to Section 5.20 ,a sub-section 1.20 which shall provide for a **public review process to be conducted by an independent expert review panel** whose function shall be to gather and analyze information and make a public recommendation to Council as part of the report related to a development permit application for a Data Processing Facility.



# Questions?





# WABAMUN WATERSHED MANAGEMENT COUNCIL

wwmc.ca Box 1005, Wabamun, Alberta T0E 2K0 info@wwmc.ca

September 3, 2025

## SLIDE 1

Good morning Mayor Gamble

Good morning Councillors,

Good morning CAO Ms Swain and Administration

- My name is Sue Styles, Board Chair of the Wabamun Watershed Management Council (aka WWMC).
- Also representing WWMC today is our Executive Director **Erica Sivell** (joining us virtually) and 2 WWMC Directors, **Denny Thomas (environmental regulatory lawyer, retired Alberta King's Court judge, extensive work in environmental assessment of numerous major projects)** **Neil Fleming (background in zoology, retired dentist, vast historical knowledge of the lake and extensive knowledge of water quality and lake water level)**
- I'll present a brief overview of the WWMC submission as provided to this Public Hearing, I will outline our 3 select overarching focus points and will then go to Dennis Thomas to expand on the select focus points and present associated resolutions...following which we would be pleased to respond to any questions you may have.

Thank you for the opportunity to provide a submission to this Public Hearing regarding amendments to the Highvale End Land Use Area Structure Plan (**ASP**) (Bylaw 2016-12) and the County's Land Use Bylaw (**LUB**) (Bylaw 2025-12) as related to the TransAlta Data Centre zoning proposal.

## SLIDE 2

The WWMC is a charitable, not-for-profit watershed stewardship group with an ongoing interest in protecting the health of Wabamun Lake and its watershed.

**Vision:** The Wabamun Lake Watershed is a healthy ecosystem with a community that shares its collective responsibility to be the best stewards of that environment.

**Mission:** To guide the development, management, and stewardship of Wabamun Lake through collaborative watershed planning, research, and public education.

We have an ongoing rich history of working collaboratively and earnestly with Parkland County on matters of protection of the health of Wabamun Lake and watershed. and it is with the same intention that we are here today.

We begin with 3 statements that underpin our submission to the public hearing this morning:

- It is the stance of the WWMC that Highvale land use decisions be made only after being informed by an Alberta Energy Regulator (AER) approved Highvale Mine Reclamation Plan.
- While the WWMC is neutral on data center development, it is concerned about protecting the health of the lake and watershed in this context.
- The WWMC concern today relates primarily to the parts of the ASP and LUB amendments that lie within the Wabamun Watershed: in the proposed amendments only the Sundance location is

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within the Wabamun Watershed. Having said that, the concerns we will express also resonate with community outside the Wabamun Watershed i.e. Keephills community.

The WWMC submission to this public hearing includes a letter that we are presenting herein, and 3 appendices -

- Appendix 1, a response of edits to the redlined ASP document.
- Appendix 2, a response of edits to the redlined LUB document, I will make a brief comment with regard to the WWMC edits to the redlined ASP and LUB.
- Appendix 3, a document entitled 'Public Review Process by an Independent Expert Panel of a Data Processing Centre on the Sundance Site / Keephills Site'. **We will specifically speak to this document a little later in this presentation.**

We note our full submission has been provided to Council in the public hearing agenda package.

Brief comment with regard to the WWMC edits to the redlined ASP and LUB in Appendix 1 & 2.

*Appendix 1, a response of edits to the redlined ASP document.*

*Appendix 2, a response of edits to the redlined LUB document,*

### **SLIDE 3- Illustration on weak language**

WWMC Directors carefully reviewed the redlined ASP and LUB draft amendments and provided extensive edit and comment for your serious consideration. Generally/overall, there is wishy washy/weak language.

For the WWMC, the critical lack of affirmative/directional language in the Land Use Bylaw amendments stands out as a significant concern for the protection of the health of watershed/environment and also for Parkland County Council decision making.

To illustrate the weak language, we take you to 2 examples/2 clauses (and there are numerous and numerous other clauses that require stronger language)-

The examples are from Bylaw 2025-23 proposed amendments document (provided in agenda package):

The amendments that illustrate weak language here are

Item 1. Creation of 3.110 Data Processing and Infrastructure Direct Control District (DC Area 7), as follows:

h. ii. In addition to any other application requirements in this Bylaw, Data Processing Facilities applications ~~may~~/ **SHALL** be required to provide a decommissioning and reclamation plan that outlines how the land will be returned to their pre-development state including plans for demolition and waste removal.

Item 5. Add the following regulations to 5.8, as

w.1.18 – A Development Permit Application for a Data Processing Facility Use ~~may~~/ **SHALL** require the following information to be provided:

- 1.18.1 Estimated water demand and anticipated source;
- 1.18.2 Wastewater effluent treatment and disposal
- 1.18.3 Traffic impact assessment; and
- 1.18.4 Requirements for off-site improvements

The wishy washy 'may' language is not acceptable in the context of the reality of so many unknowns and potentially disturbing sequelae with Data centre development - it is not surprising that residents/community are concerned.

The WWMC highly recommends that the LUB amendments be strengthened throughout with the usage of stronger directional language. Councillor Kucher-Johnson, we know you have an interest in protection of the environment as does Councillor Kowalski, Councillor Birnie and others on Council. We request/we urge that Council seriously consider the extensive edits and comments submitted in our Appendix 1 and Appendix 2 related to the ASP/LUB amendments, all of which have been discussed with the applicant, TransAlta, in detail.

Now we move on to outline and focus on overarching points made on behalf of the WWMC: I will introduce the focus points and Denny Thomas will expand on them.

Our submission included 3 focus points – we note one has been addressed – that is, we requested that a **specific land description for the sundance site** be included in the LUB amendments- we note the Sundance site specific land description has been added into the **Bylaw 2025-25-Amendments (proposed) document – thank you.** ([4. Bylaw 2025-25-Amendments to Bylaw 2016-12 – Highvale End Land Use Area Structure Plan \(Sundance\).pdf](#))

#### SLIDE 4 ASP

##### Next overarching point:

- **Commitment to comprehensively review the Highvale End Land Use Area Structure Plan.** The WWMC believes that the proposed amendments to Bylaw 2016-12 Highvale End Land Use Area Structure Plan extend beyond what is necessary to accommodate Data Processing Facilities and Accessory Buildings, and should be limited to only those amendments required. Furthermore, the WWMC requests that County Council pass a resolution to re-open the Highvale Area Structure Plan for public review no later than three months following the approval of the final Highvale Mine Reclamation Plan by the AER. Aligning the Area Structure Plan with the approved reclamation plan will ensure consistency, provide critical information on hydrological assessments, and clarify potential impacts on the health of the Wabamun Lake.  
relates to agenda document 1.

#### SLIDE 6. Public review

##### Final overarching point

- **Public Review Process by Independent Expert Panel.** To further strengthen the proposed Land Use Bylaw, the WWMC requests that it be amended to include provisions requiring an independent public review process as part of the development permit application procedure for Data Centres. This process should be conducted by a qualified expert review panel, tasked with gathering and analyzing relevant information and providing a public recommendation to County Council as part of the development permit application for an open and transparent recommendation. Such a requirement would enhance transparency, ensure decision-makers have access to the best available information, and build public confidence in the approval process. (See Appendix 3) –  
we placed this in 5.8---but I do not see 5.8 in agenda document 2.

I now pass the mic to Denny who will expand on the ‘commitment to review the ASP’ and on the ‘public review process by Independent expert panel’.

Any further comments – Denny/Neil/Erica?

**SLIDE 6 -questions**

The WWMC appreciates the opportunity to contribute to this important process; we have extensive expertise of the watershed and lake and would be pleased to respond to any questions or provide further clarification on our submissions at the public hearing.

End

We look forward to continuing to work with the County to support transparent, informed, and balanced decision-making for the benefit of the Wabamun watershed and community.

Yours Truly,

Sue Styles  
WWMC Board Chair  
chair@wwmc.ca

cc' Erica Sivell  
Hon. Dennis R. G. Thomas KC  
Dr. Neil Fleming  
Enclosures Attached, Delivered by Email

## **WWMC resolution to Parkland County Sept 3,2025 public hearing- Item 1**

### **Item 1: Area Structure Plan Amendment (Bylaw 2025-22)**

#### **PREAMBLE**

TransAlta Corporation, the applicant, has applied to the Alberta Energy Regulator ( AER ),for an approval of a revised Reclamation Plan for the Highvale Mine Area ( Revised Plan );

The Revised Plan will likely not be approved until sometime in 2026;

It is in the public interest that the provisions of the Revised Plan and the Revised Highvale ASP be in alignment and consistent with each other.

#### **THEREFORE COUNCIL RESOLVES AND DIRECTS THAT;**

1. The Administration, within 90 days of the issuance by the AER of an approval of a Revised Plan, shall commence a public review process of Bylaw 2016, the Highvale End Land Use Area Structure Plan, as amended by Bylaw 2025-22 (Revised Highvale ASP ).
2. The public review process shall include all persons who may express an interest in the review and more specifically representatives of COKE and WWMC.
3. All costs of conducting the review shall be paid for by TransAlta Corporation including all costs incurred by the County.
4. The goal of the review shall be to align a further Revised Highvale ASP with the Revised Reclamation Plan including, inter alia, all proposed land uses, all measures to restore surface drainage patterns and groundwater regimes and to assure the protection and health of Wabamun Lake and its watershed.
5. Within one year of the commencement of the review process the Administration shall report to Council with the results of the review and any proposed amendments to the Revised Highvale ASP.



## **WWMC resolution to Parkland County Sept 3,2025 public hearing- Item 2**

### **Item 2: Land Use Bylaw Amendment (Bylaw 2025-23)**

#### **MOVED THAT:**

Prior to second reading of Bylaw 2025-23 the Administration shall prepare and return to Council a further amendment to be added to Section 5.20 ,a sub-section 1.20 which shall provide for a public review process to be conducted by an independent expert review panel whose function shall be to gather and analyze information and make a public recommendation to Council as part of the report related to a development permit application for a Data Processing Facility.

The Development Authority shall, upon receipt of a development permit application for a Data Processing Facility ('Development Proposal') advise Council of the application and thereupon Council shall appoint an independent three-person panel composed of persons with expertise in the fields of environmental protection, noise attenuation, hydrology, electrical power requirements, law, economics, and social and indigenous considerations.

Upon their appointment the expert panel shall:

- a - determine the scope of the Development Proposal in a fully public process involving the applicant/ proponent and WWMC, COKE and any other directly affected persons; and
- b - then determine in a fully public process the scope of an environmental impact assessment (the 'Assessment') through the identification of any and all issues related to or arising from the Development Proposal including all environmental, noise, hydrological, transportation and cumulative impacts of the Development Proposal, as scoped.

Once the scoping of the Development Proposal and the Assessment has been completed, the expert panel shall invite and receive written, virtual and in person oral submissions from the applicant, WWMC, COKE and all other persons expressing an interest in issues falling within the scope of the Assessment. This part of the review process shall be open and transparent and shall involve hearings held in public.

Upon completion of the public review process the expert panel shall promptly prepare a written report summarizing all issues raised and information received and shall make recommendations to Council to approve the Development Proposal with or without conditions.

The applicant for a Development Proposal shall be responsible for all costs of preparing and conducting the Assessment including all costs of the expert panel and their review.



## Committee On Keephills Environment

We are striving to protect our community, enhancing and building it for the future

Proposed Amendments to Parkland County's Land Use Bylaw 2017-18 Redistricting Map and Text Amendments to Highvale Land Use Direct Control (DC) District

### **Committee on Keephills Environment known as COKE.**

The following provides to Parkland County Council an understanding of historic work, not only to ensure and establish a planning framework, but offers opportunity for new community residents to be successful through social integration within the Highvale area.

### **Introduction**

COKE is approaching its 49th year of community partnership with TransAlta and Parkland County.

COKE's board and community meetings are structured to gather, discuss and prioritize community concerns representing residents within a defined area noted within Parkland County's Highvale End Use Area Structure Plan.

These meetings are to streamline the efficiency of the discussion, in preparation to the Keephills Power Project Steering Committee meetings.

The purpose of The Keephills Power Project Steering Committee, established by Ministerial Order No. C88-58, is to provide formal communications about project activities within the area. The committee does recognize TransAlta's placement of Data Centers on the December 16, 2024 meeting agenda, suggesting community impact is yet to be determined.

Parkland County administration and elected officials participate regularly at these informative meetings and were silent on December 16 to any upcoming actions regarding Data Centers.

One of the most important items identified within this Ministerial Order is the final use of reclaimed lands, particularly to the uses that may have an impact to the environmental, social and economic matters of the community related to plant/ mine operations.

The committee and the community certainly are aware that the introduction of Data Centres will have a lasting impact on the community and add to the continuation of power generation of the impacted area.

TransAlta's recent announcement, dated February 20, 2025, towards data centres and related developments, including the "potential construction of two 400-megawatt data centres to be tied to its Keephills power plant" (Calgary Herald Feb. 22, 2025), will be impactful to the residents of the area.

One of the most concerning amendments to this bylaw (Bylaw 2017-18, 9.3.4) is the proposed elimination of the guidance outlined within the Highvale End Use Area Structure Plan.

This End Use Master Plan, directed to be created through the mine permit licensing, evolved to be known as the Highvale End Use Area Structure Plan (HEUASP).

The committee has diligently participated with Parkland County and the Power company (now known as TransAlta) for over 49 years to create collaborative processes and outcomes through this End Use Master Plan.

This Prescriptive Area Structure Plan provides the assurances to the community that environmental, social and economic matters will be considered in future land use decisions.

This Plan, however only seven years old, is outdated and does not reflect the current mine footprint or operations. The committee stresses the requirement of updating this plan, capturing the proposed project concept is just one item of possibility.

Our committee continuously has brought this to the attention of your administration and point out that provisions for this update are imbedded within the very document, stating significant change or every five years a review and updates are to take place.

This HEUASP provides prescriptive direction to future Land Uses, specifically identifying industrial and commercial locations. This document is intended to be more than conceptual, by providing details to policy regulations.

The potential loss of six prime agricultural quarters of land should be concerning to this council, these lands are identified as to be non disturbed class 3 soil, zoned agricultural post reclamation. It is very important to note that these lands have not been disturbed and do not require reclamation.

Should not council ask the question, is the potential loss of these prime agricultural lands required?

The current HEUASP through prescriptive direction, addresses the importance of agricultural lands classified with a CLI Class 1 to 4 rating and directs the placement of any future industrial developments to specific nodes.

The HEUASP in part states that land shall be developed for primarily agricultural related land uses and addresses redistricting for non agricultural uses as being prohibited, directing Industrial business to be oriented medium in nature and that heavy industrial land uses shall be prohibited.

This statutory document goes on to direct any future Industrial Development, stating Industrial Development shall only be permitted to locate in areas designated by a Statutory Plan where opportunities exist along Highway 627.

Our committee would like to point out that the direction regarding land development identified within this statutory document is to protect the residents from future industry impact and sets an understanding to the importance of future agricultural land use.

The text amendment proposed towards Data Centres located within the Highvale End Use Direct Control District Regulations (DC AREA 2) eliminates the wording that describes the purpose of this Area Structure Plan and specifically removes any HEUASP development consideration.

The proposed amendment “Computer, Electronic Data Processing Services or Data Centers”, stipulates that development authority is given to council, development mitigating or conditions of development approval are mentioned to be as identified under Resource Extraction regulations only. This is concerning to the committee and suggests that more maybe required.

The proposed Land use designation “Permitted” limits the community involvement by removing any public input or discretion.

A question for this council to consider is, if this amendment to Direct Control districting or redistricting is removing professional development personnel and has no reference to appropriate fundamental land use regulations, should council approve it?

Proper public process that may have potential lasting development impacts to the community must take place. Review and updating the current Highvale End Use Area Structure Plan with consideration to Data Centers would be appropriate.

This community does see the value of industry development to the greater good of all. However, this greater good for all concept has lasting social impacts and requires an understanding by all parties.

The loss of our local school and greater community residents, stand out and is recognized throughout many of your own documents. The availability of prime agricultural lands gives opportunity to new community residents through social integration and is the prime objective of the HEUASP.

The forced industrial power plant impact on our community required careful consideration and any additional permanent industrial development requires proper public consultation that considers appropriate development mitigation.

The committee recognizes that power generation will go hand in hand with this proposed Data Centre land use and will have lasting impacts to the community.

Below are the findings that our committee strongly support and worked hard to preserve.

**Highlights identified within the Highvale End Use ASP (BYLAW 2016-12) including references to the Municipal Government Act (MGA)**

The HEUASP is a statutory land use plan.

The Highvale End Land Use Area Structure Plan establishes a planning framework for future land use in the area known as TransAlta’s Highvale Mine and the surrounding land.

Heavy industrial land uses will be prohibited in the plan area post reclamation. Strategically located commercial and local commercial development will be supported in

the plan area as identified. HEUASP policies acknowledge existing industrial sites and the repurposing of area infrastructure for future industrial and commercial opportunities that follow best management practices, and do not conflict with agricultural operations.

The HELASP will guide future planning and development decisions within the Plan area. More detailed plans may be required for any future development to specifically address land uses towards historical and environmental matters, as well as transportation and servicing requirements.

The HELASP will be reviewed at minimum every 5 years unless significant government policies warrant a review sooner. The HEUASP will maintain consistency and align with provincial and municipal plans, while best reflecting development demand and community and resident input.

The purpose of the Highvale End Land Use Area Structure Plan is to establish a framework for future land use planning for TransAlta's Highvale Mine area and the surrounding lands.

**As understood by the community and identified within the current HELASP.**

The proposed land uses for the Highvale mine (post reclamation) consist mainly of agricultural, recreational, and conservation lands, with potential strategic development of industrial and commercial nodes.

It may be informative to know that the current districting of Resource Extraction was to be temporary and only in combination to TransAlta mining operations.

The HELASP states that the County has jurisdiction over lands outside the Mine Permit Boundary and will only have jurisdiction on Mine lands after a reclamation certificate is issued by the Alberta Energy Regulator (AER) and other obligations are completed.

Below is a map that highlights the current mine permit boundary in relationship to the proposed redistricting of lands to be identified as Direct Control.

Clarification of this should be understood and questioned.

## HELASP Statement

*“The County has jurisdiction over lands outside the Mine Permit Boundary and will have jurisdiction on Mine lands after a reclamation....”*

Again, the committee brings to your attention that the lands proposed to be redistricted to Direct Control are lands that have not been disturbed, do not require reclamation and are located within the Highvale Mine Permit boundary.

## The Municipal Government Act (MGA)

Allows for municipalities, such as Parkland County, to create a detailed framework for the subsequent subdivision and development of an area of land through a planning document called an Area Structure Plan (ASP).

Section 633 of the MGA directs that an ASP must describe in part:

- The sequence of development proposed for the area;
- The land uses proposed for the area;
- The general location of major transportation routes and public utilities; and

In addition to this statement, Section 641(2) of the MGA states that Council Decisions in Direct Control District must be consistent with a Statutory Plan.

MGA Section 641

*(2) If a direct control district is designated in a land use bylaw, the council may, subject to any applicable statutory plan, regulate and control the use or development of land or buildings in the district in any manner it considers necessary.*

## **Parkland County's MDP Bylaw 2024-22**

Powers of the Municipal Development Plan

All plans and regulations in Parkland County must align with the adopted MDP's direction including Statutory Plans:

Area Structure Plans (ASPs) and Area Redevelopment Plans (ARPs) provide additional planning detail for a specific area.

MDP Plan Requirements

Area Structure Plans (ASP)..., are planning tools that help Parkland County make informed decisions about future development.

Area Structure Plans... are statutory planning documents that are adopted by bylaw at Council after three readings and a mandatory Public Hearing. The plans describe land uses, densities, the location of major infrastructure, and development phasing.

The MDP identifies a Balance of clarity and flexibility in development rules.

Conserving Farmland, this MDP demonstrates an overall level of agreement that conserving farmland is a shared responsibility and holds a high regard to agricultural land preservation.

Parkland County's MDP bylaw 2022-17 adds consistency to this direction and states that the primary goals are to protect agricultural lands by encouraging ongoing agricultural operations around the Highvale Mine, supporting potential new country residential developments and designate lands that are for commercial and industrial development.

**The Highvale End Use Area Structure Plan aligns with these statements and sets out a path of achievement that supports the communities and councils' direction.**

## 5.2 Goals and Objectives (HELASP)

This section outlines the goals and objectives of the Plan. Based on a technical review of the Plan area and the consideration of community feedback on values and ideas for the Plan area obtained during public engagement activities, the following goals and objectives were identified:

In part

- Make agriculture a priority by protecting lands with CLI Class 1-4 agricultural capability rating from non agricultural related development.
- Provide opportunities for commercial and industrial uses in strategic areas identified in this plan, along Highway 627 and within existing industrial sites to potentially repurpose areas and infrastructure.

The committee recognizes the current designation of the proposed Direct Control lands to the proposed DC extension. However, consideration must be given that this current DC designation was intended to be temporary and is only to facilitate past mining operations that have now ceased.

Please consider that the proposed amendment extension is to lands that have not been impacted by mining operations and would support an agricultural priority objective.

## 6.0 Land Use Policies (HELASP)

### 6.2 Agricultural Development

1. Agricultural – Lands with CLI Class 1 to Class 4 agricultural capability rating, as shown on Map 7, shall be developed for primarily agricultural related land uses. Non agricultural related uses may be permitted on lands with CLI Class 1 to Class 4 agricultural capability rating provided that they:

- a. Are resource extraction, public utilities, or extensive recreational uses;
- b. Are not within identified Environmentally Sensitive Areas;
- c. Do not impact existing agricultural operations; and
- d. Have sufficient road access.

### 2. Redistricting Agricultural Lands (HELASP)

The re-districting and subdivision of these lands for non agricultural related uses shall be prohibited, unless otherwise allowed for in this Plan, other Statutory Plans, or an Outline Plan.



## 6.5 Commercial and Industrial Development (HELASP)

### In Part

.....(e). Where opportunities exist for commercial uses along Highway 627 and within the existing industrial sites to potentially repurpose areas and infrastructure.

Business and Medium Industrial – Industrial land uses shall be business-oriented to medium in nature. Heavy industrial land uses shall be prohibited within the Plan area.

7. Industrial Development – Industrial development shall be permitted to locate:

- a. In areas designated for industrial development by a Statutory Plan or Outline Plan;
- b. Where opportunities exist for industrial uses along Highway 627 and within the existing industrial sites to potentially repurpose areas and infrastructure; or
- c. In areas that do not conflict with adjacent land uses in terms of appearance, emissions, noise, or traffic generation, unless suitable buffers are provided, and has a closed loop sewage disposal system.

10. Mitigation – The County may require the use of landscaping, screening, setbacks, the strategic location of outdoor storage or other controls to mitigate nuisance impacts between industrial and nonindustrial development.

The committee is asking that council follow this policy regulation imbedded within the ASP.

Include proper public input through process, update the Highvale End Use Area Structure Plan along with the Land Use Bylaw to consider future development opportunities.

Involve the affected community by holding open houses through proper and timely notifications. One public open house, advertised through social media that provides a limited three-hour opportunity to digest information and provide comment may not be realistic.

Hold events where participants are at ease to attend, Keephills Community Center is an option. Parkland County does have an interest in this very building and is at center of this particular area of impact.

Include proper development regulations to ensure compatibility with the residents and anticipated industry.

A suggestion from the committee may be similar to:

### 7.4 HI - Heavy Industrial District. (Parkland County LUB 2017-18)

*" The purpose of the Heavy Industrial District is to provide for large scale industrial uses that due to their large land requirements and potential negative impacts such as noise, odour, risk of toxic emissions, fire or explosion hazard, are incompatible with other non-industrial land uses, but may be compatible with extensive agricultural operations".*

The committee supports future development concepts and is of the understanding that a detailed development structure for this area is in place.

The committee strongly suggests that council show support to the Highvale End Use Area Structure Plan, your Statutory Plan, prohibiting non agricultural land uses by directing industrial land uses to specified commercial locations as identified within the plan.

Reaffirm and avoid the losses of prime agricultural land, provide for the opportunity toward the potential integration of new community residents as we see this is already occurring.

This is and has always been the prime objective of this End Use Master Plan. (HEUASP)

The community asks for clear communication and clarity on terminology like “Permitted” and/or “approved by council”.

Is the development authority given to council, or is it simply a permitted use?

If approved by council or simply permitted, what is the mechanism proposed to mitigate development impact?

What are the proposed development regulations, if any?

What is the mechanism for public input at time of proposed development?

It is the committees understanding that Parkland County has a commitment to statutory obligations. Increasing regulatory risks may lead to delays and possible legal appeals associated to the very developments this amendment is attempting to attract.

The Committee on Keephills Environment thanks Parkland County Council for the opportunity to share their concerns.

Chairman Dan Vanderwell,

Vice Chaiman John McNab



## Committee On Keephills Environment

We are striving to protect our community, enhancing and building it for the

RE: BYLAW AMENDMENT 2025-08

This is response to the information provided by Parkland County Administration and comments made by Council members on March 11, 2025, at time of the public hearing to Land Use Bylaw Amendment 2025-08.

The information below provides clarity to the concerns our committee has towards the proposed changes to the current BYLAW NO. 2017-18,

Specific to 9.3 Highvale End Land Use Direct Control District Regulations (DC Area 2)

Our intention is not to repeat the committees previously provided information.

Please accept this submission as new information and complimentary towards our concerns we observed at the public hearing on March 11.

Administrations responses to council's concerns prove to be extremely alarming; the lack of awareness towards the current activities of TransAlta mining operations and timelines proves this apprehension.

Parkland County's presentation provided a REDLINE version of the 9.3 Highvale End Land Use Direct Control District Regulations (DC Area 2).

We do agree with your administration that this amendment is not about an application for a DATA CENTER, its about PROCESS. Residents and this committee understand that a Data Center development is tied to this amendment, and one must expect a PERMITTED development is a future certainty.

PERMITTED allows for this to be a GIVEN.

The Committee on Keephills Environment (COKE) points out to council that administrations REDLINE DRAFT of 9.3 regulation, strips any guidance or requirements the Highvale End Use Area Structure Plan (HEUASP) may have and fails to provide for any actual development regulations towards Data Centers.

The proposed changes to these regulations suggest that council will have some sort of control over Data Center approvals.

Permitted indicates that council will have limited control over these developments, notably with no development regulations or guidance.

This lack of development regulations proves to be concerning, and this public concern must be realized by this council.

At the March 11th public hearing, Parkland County's Administration stated that the requirements set out within the established Highvale End Use Area Structure Plan do not relate and have a legal opinion to that fact.

Administration was asked by council when does the HEUASP come into affect. Administration indicated that some time in the future, possible 2070.

What information was provided to legal council to gain this opinion?

Will council ask to review this legal opinion that was commented on?

COKE strongly disagrees with your administration's view and provides substantial background information that will establish the validity of this statutory document and its relevance to this amendment.

The Highvale Mining process is a form of disturbance and reclamation, **continuous reclamation** that follows a path of direction and is intended to achieve the goals of the Highvale end use plan.

Initially the communities understanding of procedure was that the lands affected within the mine permit boundary constitutes active mining with reclamation actively immediately following.

This process was identified as to lessen the overall social impact of the effected community.

Well, that was the story portrayed in the beginning and this process of reclamation lagged extensively behind active mining.

In addition to the Mine Permit Boundary affected lands, there are **Buffer Zones**. These are the lands that encompass the Mine permit boundaries and are non disturbed by mining operations.

The Highvale End Use Area Structure Plan activity provides for an end use result of all these identified lands and yes, some aspects of this plan do not come into affect until the last reclamation certificate is offered.

However, to get to the completion of this plan we must continually input the policies and directives of the HEUASP to achieve its end use goals.

Identifying the lands as disturbed, non disturbed, mine permitted boundary and buffer zone, proves for phased implementation of the HEUASP.

HEUASP is the legal Statutory Document that provides the community with assurances, and that social integration is a prime objective.

The following provides evidence that Parkland County Administration and Council are very aware that TransAlta's Mining operations have now CEASED, and that reclamation is the priority.

TransAlta's publicly announced the shut down of coal mining at Highvale and that mine reclamation has been **accelerated**, as of December 31, 2021.

COKE provides council with some highlights from Trans Altas news release on this matter, dated February 2022.

### **Highvale Mine Decommissioning and Reclamation Plan**

*"Operations at the Highvale Mine shifted to full-time reclamation in January 2022 with plans to have the Highvale Mine fully reclaimed by 2046."*

*"TransAlta is targeting to have all land regrading completed by 2036, soil placement activities completed by 2042 and full reclamation of the Highvale Mine completed by 2046"*

*"The sequence of progressive reclamation activities at the Highvale Mine will continue as described..."*

*“Soils will be replaced in depths according to planned end-land use”*

*“Regrading designs will be prepared taking into account planned end-land uses,”*

*“Objectives for Reclamation”, are*

*“Return all areas disturbed by mining operations to acceptable and/or equivalent land use and capability”*

*“Work collaboratively with regulators, governments, local stakeholders and Indigenous communities as we reclaim the Highvale Mine lands”*

*“Currently, 1,566 hectares (“ha”) of land at Highvale has been reclaimed and 215 ha are certified. In 2021, TransAlta applied for a reclamation certificate for 263 ha.”*

*“With the end of coal operations occurring earlier than originally planned, some previously purchased and undisturbed land owned by TransAlta is no longer needed.”*

*“The undisturbed land and land with a reclamation certificate will be made available for sale...”*

**These actions are current and are taking place today.**

We provide these additional details of the factual events that lead the Committee on Keephills Environment to the belief that Parkland County Administration and Council are very aware of the significances the Highvale Area Structure Plan has on current TransAlta’s Highvale Operations and reclamation timelines.

The Committee on Keephills Environment provides evidence to this fact addressed within TransAlta’s Highvale Mine Integrated Application (2022)

*“Parkland County, TransAlta held regular engagement meetings with Parkland County elected officials and senior administration from 2020-2022. These meetings featured presentations about the Highvale Mine and future reclamation and contained updates on TransAlta’s operations in the region.”*

TransAlta provided all participants with clear and timely information about the Highvale Mine activities and timelines.

TransAlta Update Meeting with Parkland County, March 28, 2022, included representatives from Parkland County and TransAlta.

#### Parkland County

- Allan Gamble, Mayor
- Sally Kucher Johnson, Div. 1 Councillor
- Kristina Kowalski, Div. 2 Councillor
- Phyllis Kobasiuk, Div. 3 Councillor
- Natalie Birnie, Div. 4 Councillor
- Rob Wiedeman, Div. 5 Councillor
- Allan Hoefsloot, Div. 6 Councillor
- Laura Swain, CAO
- Jeff Dyck, GM
- Joshua Culling, Manager, Planning
- Rob Coon, Consultant

#### TransAlta

- Brian Jones, VP Alberta Thermal
- Lloyd Bures, Manager, Business Transition &  
Business Improvement
- Brandon Stewart, Mining Manager, Highvale
- Rick Wallace, Senior Engineer, Highvale
- Jacob Harris, General Foreman, Reclamation
- Stacey Lauder, Alberta Thermal/Mine External  
Relation





TransAlta held regular engagement meetings with Parkland County elected officials and senior administration from 2020-2022. These meetings featured presentations about the Highvale Mine and future reclamation and contained updates on TransAlta's operations in the region.

**Highvale Reclamation 2020-22 Presentations/Meetings with Parkland County**

- ✚ Highvale Mine Reclamation – Meeting with Parkland County, November 26, 2020
- ✚ Reclamation: Highvale Mine & former Wabamun plant site – Meeting with Parkland County, April 19, 2021
- ✚ Highvale Mine Reclamation & Business Update – Meeting and mine tour with Parkland County, September 7, 2021
- ✚ Highvale Mine Reclamation – Meeting with Parkland County, November 15, 2021
- ✚ Tour of Keephills 3 Power Plant and Meeting with Parkland County, March 28, 2022

Discussion at these meetings included the importance of tax revenue for the County with interest in future economic development opportunities; potential for an off-highway vehicle park on the mined land; road replacements; the Highvale End-Land Use Area Structure Plan (Highvale ASP); future land sales and land donations; and the potential for TransAlta to go back and mine coal either for export or using carbon capture and sequestration (CCS). For a more detailed description regarding these topics, refer to Section 3.4 Summary of Stakeholder Interests, Concerns and Resolutions. A copy of the presentation from the most recent meeting held on March 28, 2022, is included in Appendix A.

Parkland County was appreciative of TransAlta's engagement on the Highvale Reclamation plan and provided TransAlta with a letter of support stating that the proposed Highvale Mine Reclamation plan aligns with the Highvale ASP. This letter is included in Appendix A.

Please note the references to the Highvale End Use Area Structure Plan (Highvale ASP).

Future land sales...

Parklands letter of support, stating that the proposed Reclamation plan aligns with the Highvale ASP.

These statements are demonstrating the importance of the Highvale ASP and provide direction to reclamation alignment.



Little Volga (Beaver Creek), will be re-established as a part of the natural drainage of the site. Some of these other creeks will be integrated into the end-pit lake systems.

#### **Highvale ASP**

TransAlta discussed a review and update of the Highvale ASP Bylaw 2016-12, as it was due for review in 2021 with Parkland County. Parkland County communicated that they were not prepared to review the Highvale ASP at that time and would advise when they would be ready for the review. TransAlta shared their willingness to assist in the review of the Bylaw when Parkland County is prepared. In 2022, a letter of support received from Parkland County references that the proposed Highvale Mine Decommissioning and Reclamation Plan is aligned with the current Highvale ASP. A copy of the letter of support is included in Appendix A.

It is established that the Highvale ASP document is scheduled for updating and this is well known to both Parkland County and TransAlta, the delay of this review and update is due to unknown reasons expressed by Parkland County's Administration.

Our committee fails to understand this delay to update the Highvale ASP, for the financial obligations to review and update this Highvale ASP are TransAlta's.

#### **Highvale Mine and Decommissioning and Reclamation Plan**

Parkland County provides a letter of support, with significant recognition to the Highvale ASP and the Reclamation Plan dated June 8, 2022.

Please note Parkland County's a commitment to the Highvale End Use Area Structure Plan and the identified agricultural end-land uses.



OFFICE OF THE MAYOR

June 8, 2022

Alberta Energy Regulator

To Whom it May Concern:

**Subject: Highvale Mine Decommissioning and Reclamation Plan**

Parkland County has a long-standing, cooperative relationship with TransAlta Corporation ("TransAlta") due to their 110+ year history in Alberta, including over 60 years in the Wabamun region. As the active coal mining has ceased at TransAlta's Highvale Mine, Parkland County was pleased to review the February 2022 Highvale Mine Decommissioning and Reclamation Plan and summary of the March 2022 stakeholder and public open house.

Parkland County has stated goals for agriculture and economic growth which aligns with the proposed Highvale Mine Decommissioning and Reclamation Plan as well as Parkland County's Area Structure Plan. The post reclamation landscape will have a balance of agricultural end-land uses, forested/open grass areas, wildlands, wetlands, and end-pit lakes, with full reclamation completed by 2046.

Sincerely,

Allan Gamble  
Mayor

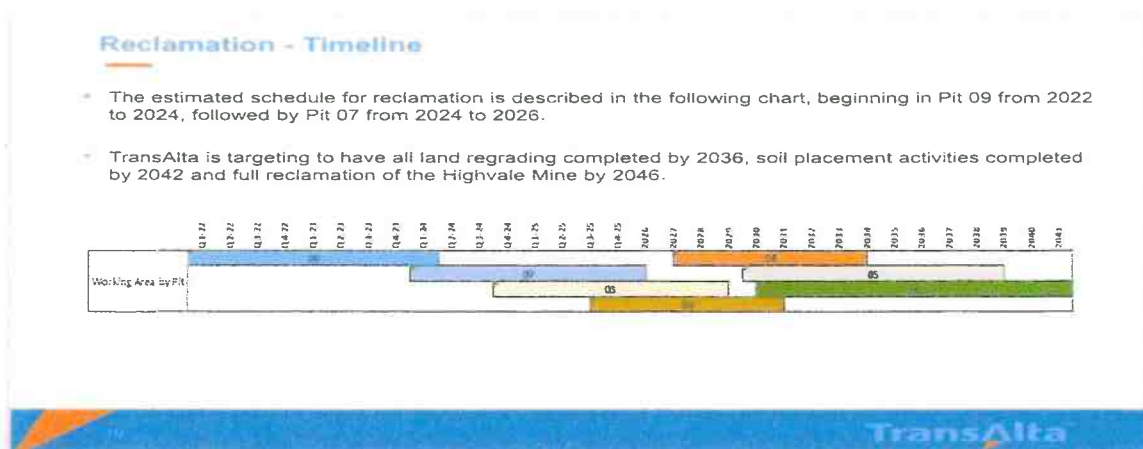
A handwritten signature in blue ink, appearing to read "Allan Gamble", written over a faint, larger version of the same signature.

Copy: Parkland County Mayor and Council  
Laura Swain, Chief Administrative Officer

53109A Hwy 779 Parkland County, AB Canada T7Z 1R1  
F 780.968.8888 T 1.800.880.0858  
F 780.968.8411

[parklandcounty.com](http://parklandcounty.com)

Parkland Counties recognition towards the conclusion of active coal mining, mine reclamation and timelines, certainly provides for a contradiction of administrations responses at the March 11 public hearing.



Administration and council are very aware of mine reclamation time frames and the commitments made to the Highvale End Use Area Structure Plan.

This information provides for uncertainty to Parkland County's Bylaw Amendment 2025-08 presenters knowledge towards the mining and reclamation time frames.

Combined with this lack of knowledge and understanding, how will council assure that the information provided towards the Highvale End Use Area Structure Plan and direction to obtain a legal opinion be accurate.

We question the information that may have been provided to gain this opinion.

The Committee on Keephills Environment have been actively working with TransAlta to achieve the end results of the HEUASP directives.

It is unfortunate that some members of Parkland County's administration fail to recognize the importance of this plan and its legal regulatory obligations.

COKE board of directors have actively presented this importance to your administration many times over the past couple of years to no avail.

The question Council asked was, when does this plan come into effect?

The answer is it always was in effect and implementation is **NOW!**

The Committee on Keephills Environment strongly asks council to vote against this proposed amendment and come back to the community with a plan that includes thoughtful consideration of the current and future residents of the area.

Respectfully

The Committee on Keephills Environment

Speaking notes

Good Morning

The committee on Keephills Environment compliments your administrations attempt to consider the requirements of the Highvale End Use ASP.

The adjustment to the proposed amendment and your administrations statement of recognition towards the Highvale ASP proves the relevance of this document.

The committee, through our submissions to council, provide for the evidence of legal requirements and identifies the proper process of implementation of the Highvale ASP.

We ask council to follow their own judgment and consider this Highvale End Use ASP as a legal obligation.

Administration proposes to strip any guidance or requirements the Highvale End Use Area Structure Plan may have and suggests that Resource Extraction setbacks provide adequate regulations towards Data Centers.

The Committee disagrees with these actions and provides extensive proof to this council, that the Highvale End Use ASP is relevant and supports a process of development towards future industrial areas.

Administrations suggestion is to wait till some time in the future when all reclamation is completed.

The committee would like to point out, that would be like reading a road map, after you think you got to your destination.

We ask Council to question this logic.

Our committee's submissions prove that Parkland County has a commitment towards the implementation and success of this plan.

Parkland County's administration stated that legal opinion was obtained however now it appears to be identified as an admin review.

COKE is not opposed to this council requesting a legal opinion and we encourage council to seek this advice.

Our committee again points out that the policies identified within this ASP are relevant and have legal bindings.

The MGA specifically states that Council must adhere to an Area Structure Plan even within a Direct Controlled District.

The Highvale ASP specifically states that this Plan is current and active.

The Committee disagrees with your administration's interpretation of relevance and the plan itself contradicts your administration's interpretation.

As your administration stated, this ASP is different than most ASPs.

We agree as it is intended to be prescriptive for a reason.

The Highvale ASP states that it will guide future planning and development decisions within the Plan area.

The plan area is not isolated to mine disturbed lands as your administration suggests.

The plan includes the entire area encompassed, as identified within the ASP.

This end use plan anticipated additional land uses; these are identified within the plan area and there is a process outlined for industrial uses.

Parkland County has made a commitment to the procedures of this plan.

As stated, this is not about Data Centers its about process.

A process that provides for fair consideration of all applicable information.

The Highvale End Use Area Structure Plan is applicable and relevant.

The Committee on Keephills Environment strongly asks council to openly consider this information.       Vote against this proposed amendment.

Come back with a plan that considers all relevant information.





## Committee On Keephills Environment

We are striving to protect our community, enhancing and building it for the future

Good morning. My name is John McNab.

Today I'm speaking to you regarding the Committee on Keephills Environment concerns on the recent proposed 2025-08 Bylaw amendments.

Introduction of other committee members in gallery ...

The committee has submitted to council a historical outline of their participation with Parkland County and TransAlta over the past 49 years, identifying some of the significant work the parties have achieved. One area of this collaboration is credited to the detailed policy direction of the Highvale Mine End Use Plan.

With that document in mind, we would like to provide you with additional comments regarding Parkland County's Administrative report presented January 27, 2025, at first reading and touch on some of the highlights of our submission.

Our committee met and identified discrepancies towards policy and regulations set out within the Highvale End Use Area Structure Plan and noted that the MGA directs council to adhere to their own statutory plans.

First reading, Administration's presentation to council failed to provide to council the importance of the current bylaw references, stating that all aspects of development are subject to the Highvale End Land Use Structure Plan.

The committee strongly disagrees with 9.3.7(a), "Computer, Electronic and Data Processing Services use shall be decided upon by council". The significance of the Highvale End Use Area Structure Plan must be included in all future development goals and policy for this area.

The Municipal Government Act address this very item in Section 641 of the MGA and states.

*MGA Section 641 (1) If a direct control district is designated in a land use bylaw, the council may, subject to any applicable statutory plan, regulate and control the use or development of land or buildings in the district in any manner it considers necessary.*

It is this committee's understanding that a statutory document like the Highvale End Use Area Structure Plan shall be applicable and council will be subject to its policies and direction even in a Direct Control District.

9.3 (4) is also proposed to be removed in its entirety. This regulation directs council to a plan that has established an acceptable pattern of land use for the area. This is the prime objective of the Highvale End Use Area Structure Plan.

Our committee strongly recommends that council value community collaboration and participation that created this plan. The structured regulations and policies of the Area Structure Plan are more than a conceptual scheme, they provide for a legal regulatory design, that is supported through proper public processes.

Permitted Use, Council Approved and the reference to Post Reclamation authority, delivers extreme confusion on procedure.

Clarification on this authority is required. The concern is with development regulation and any future mitigation process.

At this time, Data Center development and community impact is unknown, and public input must be considered at time of a proposed development.

What is the appeal process if development is simply a permitted use?

What are the development regulations proposed?

What is the appeal process if council is the sole approving body?

What development regulations will council propose?

What is the appeal process if council does not follow the MGA?

Who has authority within the Mine Permit boundary?

Does AER (Alberta Energy Regulator) play a roll?

The committee seeks clarification on these questions.

Administration stated that Resource Extraction Regulations will guide the development setbacks on Data Centers.

This is very concerning and appears to be empty of consideration of any real potential development regulations.

Again, the failure to not recognize the efforts of the Highvale End Use Area Structure Plan policies, establishes a short sightedness to proper development policies of the area.

Concerns and questions asked at time of open house suggest that potential impacts require additional consideration and shall not be left to a simple set back guideline.

TransAlta indicated at the recent December 16, 2024, Keephills Power Project Steering Committee meeting, attended by your administration and a council member, that community impact towards Data Centers is yet to be determined. We agree.

At the open house we asked why an extension of DC Area 2 land is required?  
Why would six quarters of quality agricultural lands be considered?  
What is the importance of those lands towards proposed Data Centers?

Our committee pointed out that there appears to be sufficient existing DC Area 2 lands or mine impacted lands that could be considered for industrial development.

No real response to these questions was received.

At First Reading the administrative report to council stated to restrict impact on agricultural lands and stay within the existing DC Area 2.

Our committee points out this discrepancy or is it an administrative suggestion?

An additional committee suggestion to council is to support your own moratorium on Bylaw Text Amendments and we agree to your statements of reason.

*“From start to finish, it often takes **6 months or more** to process and decide these types of applications.” and “benefits of the pause outweigh the inconveniences by protecting you from investing time and money into a process that may have to be repeated all over again”*

We thank council for the opportunity to bring forward our committee’s historic work.

This work is not only to ensure and establish a planning framework for the area but to also provide opportunity for new community residents to be successful through social integration.

Thank You

Statements in regard to DC expansions

Highvale End Use Area Structure Plan (HEUASP). The name identifies the objective of the plan, the content of the plan describes the process to realize the plan.

The Mine Buffer zone and Mine permit area, temporally zoned as Resource Extraction, created only to accommodate TransAlta's **past** mining operations.



These lands identified to be redistricted to Direct Control to consider Data Center developments, contradicts all aspects of the Area End Use Plan.

TransAlta Mine Permit Boundary and Operations are listed to be redistricted to agricultural as mining operation come to an end. HEUASP (End Use plan).

TransAlta has now started the process of selling buffer zone lands to new residents. TransAlta failed to redistrict back to Agricultural prior to sale.

Failing to redistrict back to an agricultural district, as directed within the HEUASP, is causing unnecessary building development difficulties for new community members.

These lands are identified as to be non disturbed class 3 soil, zoned agricultural as identified on Map 7 of the HEUASP and realized through the coal phase out program.

Multi Year Soil productivity studies/reports are available and have been produced by COKE, Alberta Environment and Alberta Agriculture and set a baseline understanding. This is to achieve the reclamation goals set out within the end use plan (map 7 HEUASP).

Productivity studies specifically include the lands proposed to be impacted by this amendment.

The potential loss of six prime agricultural quarters of land should be concerning to this council,

Mayor and Council,

I am speaking on behalf of myself, husband and family of soon to be six kids.

We were present at the last two hearings held earlier this year and voiced our concerns regarding the amendment to the Highvale End Land Use Area Structure Plan and New Direct Control District for the purpose to allow Data Processing Facilities.

To recap very briefly, we purchased 80 acres from TransAlta in the summer of 2023. We had hopes and dreams of building a small homestead away from the city limits, noise, and big industry.

Our concern with the restructuring and new direct control district is that our property is just slightly over 800 metres away. What will this do to the peace and quiet and beautiful landscape of the area? As a landowner so close in proximity what happens to us? Do we just become collateral damage to big industry?

We appreciate and feel that Council heard our concerns at the previous hearings, and I have come here today to request if this amendment is to be passed for the development of future Data Processing Facilities that our little voice isn't ignored.

We are asking from council that the following requests be met:

- That the noise impact of future industrial development including but not limited to Data Centre Facilities will not exceed the current allowable noise levels of the existing Keephills Facility.
- Dark Sky regulations will be implemented.
- That the future facilities will be placed as close as possible to the Keephills Generating Plant

Again, for being so close in proximity to the redistricting of the Direct Control land, will Council be able to ensure local landowners that are impacted directly be taken care of if this development impedes on the peace and tranquility of our own land and our future development plans? And if not, what happens to us?

# Highvale End Land Use Area Structure Plan and Land Use Bylaw Amendment



# Who is TransAlta?

- » TransAlta Corporation is one of Canada's largest publicly traded power generators, owning and operating a diverse fleet across Canada, the United States and Western Australia.
- » Our portfolio includes hydro, wind, solar, battery storage, natural gas and coal generation, complemented by our world-class asset optimization and energy marketing capabilities.
- » With a history of over 100 years, TransAlta continues to drive progress in the energy sector while prioritizing environmental stewardship and social responsibility.
- » As one of Canada's largest independent power producers we are committed to providing the energy mix required for today and the future – a balanced, technology-agnostic energy mix that includes renewable and gas-fired generation.



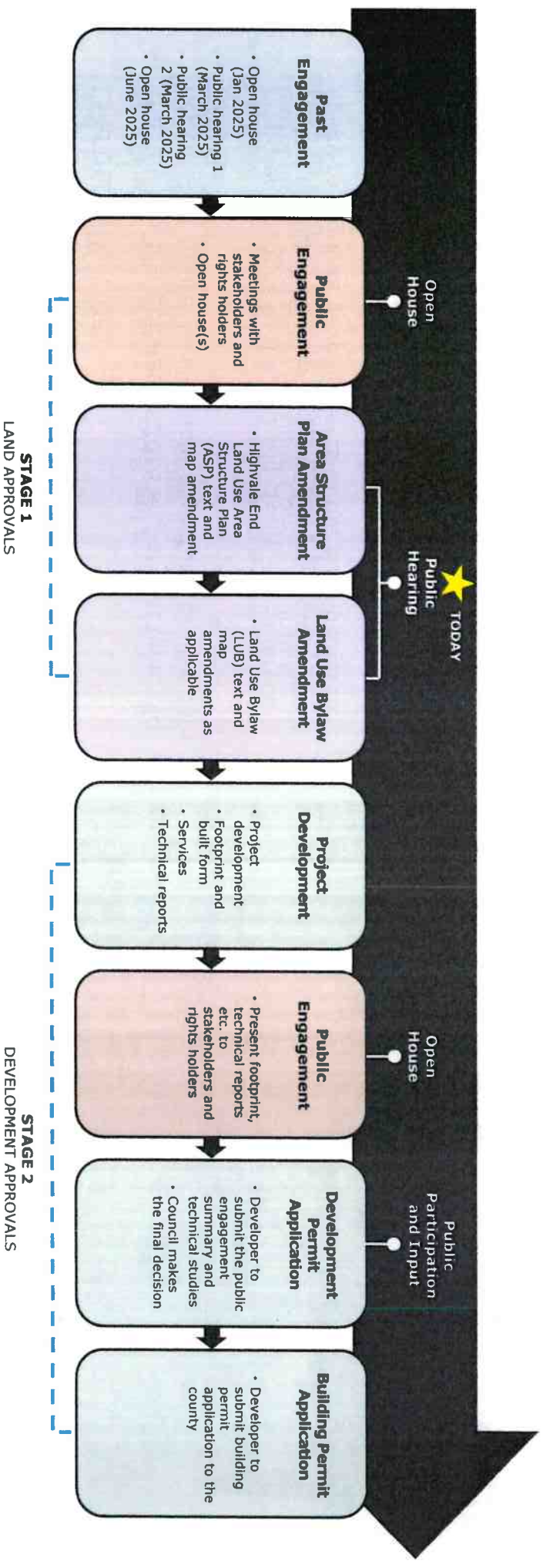


# Overview

- » TransAlta is proposing amendments to the Highvale End Land Use Area Structure Plan (ASP) and Parkland County Land Use Bylaw (LUB).
- » The ASP was last updated in 2016 and at that time, did not consider future development opportunities, like data centres.
- » Proposed changes to the LUB will create a new direct control district that gives Parkland County Council the ability to regulate developments in the amended areas.
- » The proposed changes will allow for potential data centre developments in the future.
- » Any future data centre proposals will go through the well-established Parkland County development application process, in addition to provincial regulatory review.
- » Should a proposal come forward, there will be multiple opportunities for the community to engage and provide input.

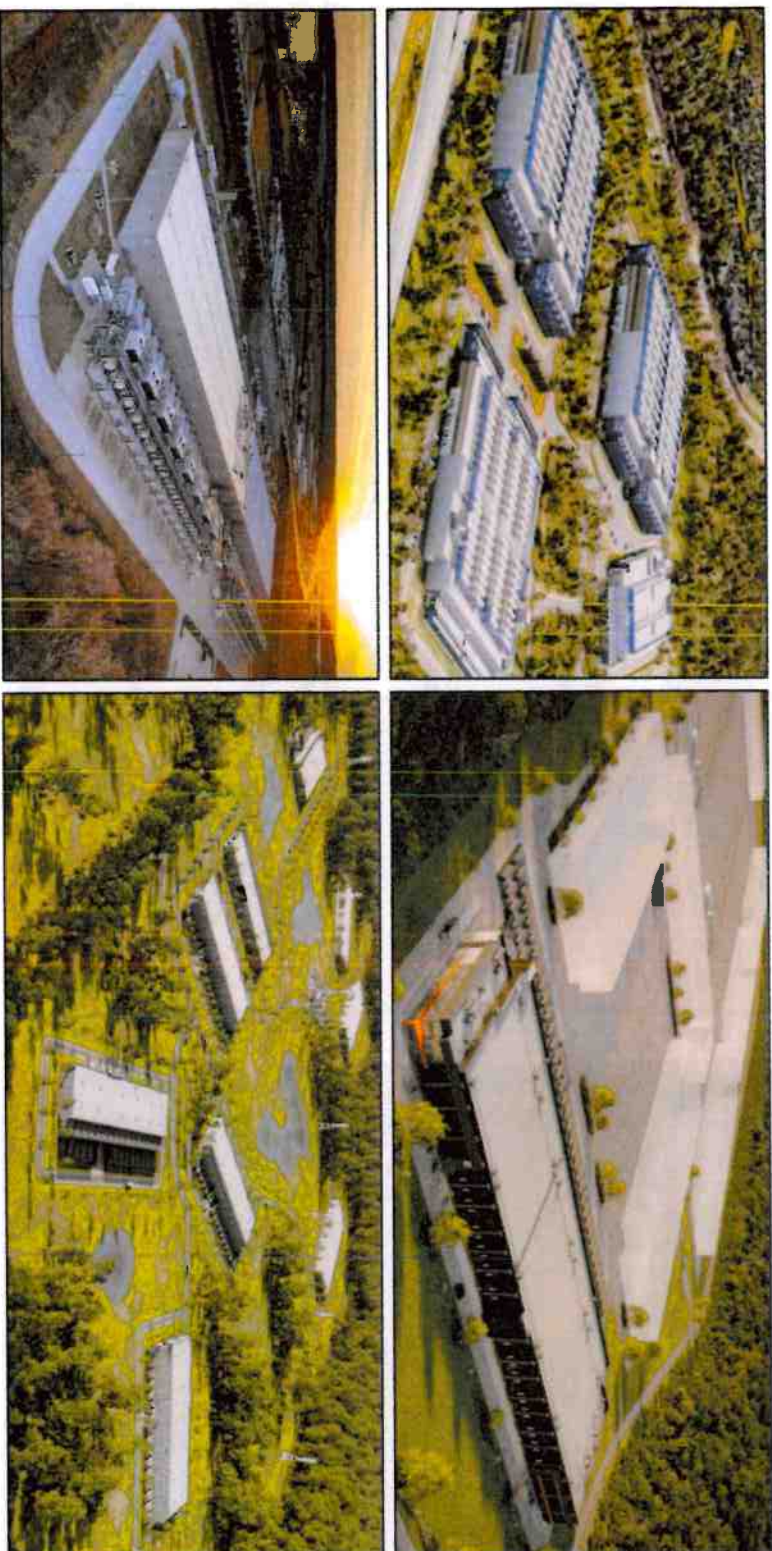


# Development Approval Process





# What Does a Data Centre Look Like?



**Top row from left to right:** Ashburn Campus (7 buildings - 288 MW) [VA]; Red Oak Campus (4 buildings - 400 MW) [TX].

**Bottom row from left to right:** Google data centre (~76 MW) [IA]; Rocky Branch Creek Technology Park (12 buildings - 270 MW) [MO].

# Data Centre Benefits

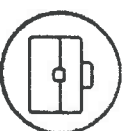


**Telecommunications infrastructure upgrades** to enhance connectivity to the region.



Parkland County Tax Revenue **helps to support and diversify property tax base.**

Increase in annual tax payments could help support roads, schools, hospitals, emergency services and other local programs vital to the local community.



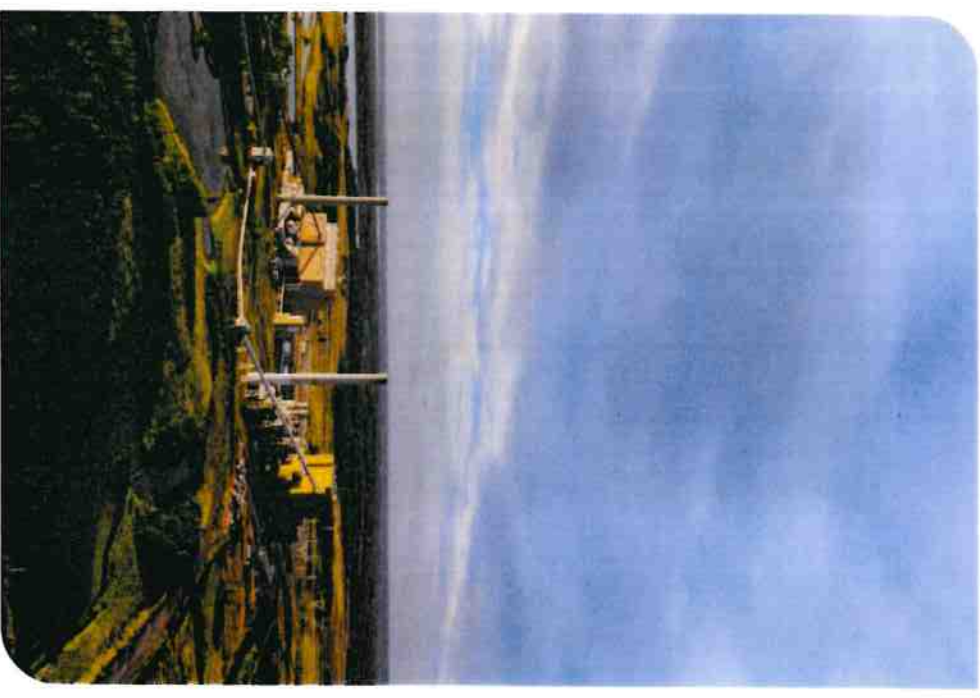
**200-1000 potential construction, technical and full-time jobs.**



**Increase demand for local goods and service providers**, including professional and technical roles, equipment operators, mechanics, truck drivers and labourers.



**Investment in local infrastructure and services.**



# Public Engagement

To share clear, accessible information about the proposed bylaw amendments and to collect feedback from the public and stakeholders, four open houses focused on creating opportunities for open dialogue, clarifying technical aspects of the proposal, and responding to community input:

- » **Tuesday, June 17, 2025**, at Seba Beach Heritage Pavilion
- » **Thursday, June 19, 2025**, at Keephills Community Hall
- » **Tuesday, July 29, 2025**, at Seba Beach Heritage Pavilion
- » **Wednesday, July 30, 2025**, at Keephills Community Hall

In addition to public open houses, TransAlta engaged directly with local stakeholder groups and responded to comments and requests for more information from Parkland County landowners.





# What We've Heard

Concerns were expressed by stakeholders regarding the overall application and potential approval process for a data centre.

TransAlta's proposed amendment to Parkland County's **Land Use Bylaw (Bylaw 2025-12)** includes the following in **Section 3.80 "Keephills Direct Control District (DC Area 4)"** and **Section 3.110 "Data Processing and Infrastructure Direct Control District (DC Area 7)"**:

## Decision Authority

- » Data Processing Facility applications must be decided by Council;
- » Power Generation Facility applications must be decided by Council (pertaining to DC Area 4 only);
- » All other Use applications must be decided by the Development Authority.
- » Council may require any technical studies or information as outlined in Section 7.40 that it deems necessary to decide on an application.

## Additionally, in **Section 5.80 "Data Processing Facility"**:

- Before submitting a Development Permit application for Data Processing Facility, the Development Authority may ask the Applicant to undertake public engagement in accordance with County Policy.



# What We've Heard

Concerns were expressed by stakeholders regarding impacts to agricultural uses, the rural community, and the natural environment.

TransAlta's proposed amendments to the **Highvale End Land Use Area Structure Plan** and the **Land Use Bylaw** includes the following:

## ASP – Section 6.12 Industrial Development on Undisturbed Lands

- » Proposed development on undisturbed lands must provide technical studies that demonstrate:
  - » Avoidance or mitigation of impacts to adjacent agricultural land uses and the environment; and
  - » Mitigation of impacts to the surrounding rural area, country residential areas, and the Hamlet of Keephills.
- » Co-location of agricultural uses within non-agricultural development on undisturbed lands is encouraged but not required.



## LUB – Section 3.80 (DC Area 4) and Section 3.110 (DC Area 7)

- » In addition to any other application requirements in this Bylaw, Data Processing Facility applications may be required to provide a decommissioning and reclamation plan that outlines how the lands will be returned to their pre-development state including plans for demolition and waste removal.



# What We've Heard

Concerns were expressed by stakeholders regarding how a data centre might affect light, noise, traffic and water quantity and quality.

Data centre design and operational plans that would allow some of those concerns to be addressed aren't available until a data centre proponent submits a Municipal Development Permit application.

To address some of those concerns, TransAlta is proposing amendments to **Section 5.80 (Data Processing Facility)** of Parkland County's **Land Use Bylaw (Bylaw 2025-12)** to include the following:

## Noise

- The applicant may be required to provide a noise impact assessment.
- Provision and compliance with a noise impact assessment, including installation of a noise monitoring system, may be imposed as a condition of approval.
- Appropriate Acoustic Barriers must be included if deemed necessary by a noise impact assessment.



## Water Use

- A Development Permit application for a Data Processing Facility Use may require the following information to be provided:
- Estimated water demand and anticipated source;
  - Wastewater and effluent treatment and disposal.



## Light

- Lights must be designated dark sky compliant and direct light below the horizon and away from adjacent properties.

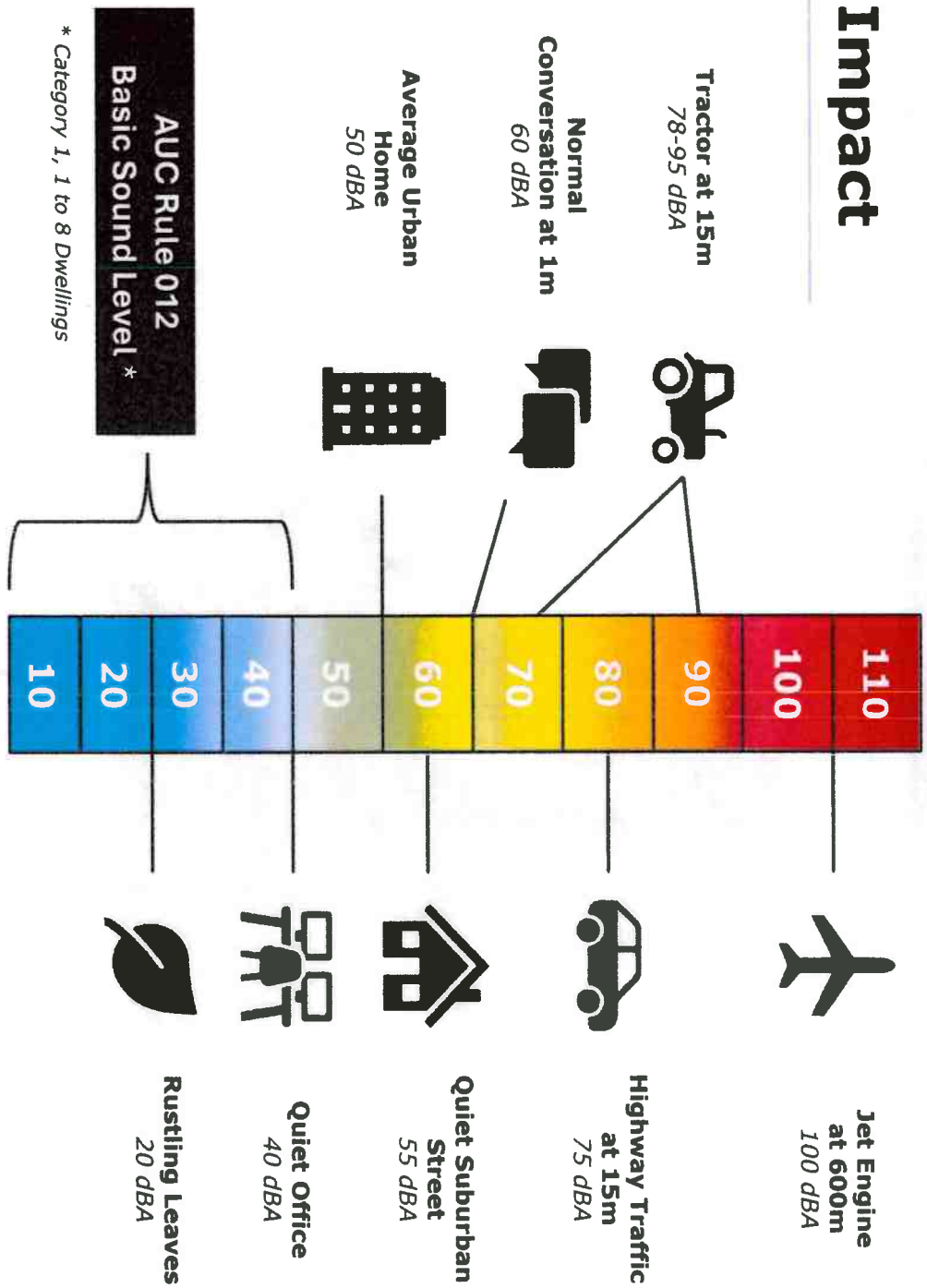


## Traffic

- A Development Permit application for a Data Processing Facility Use may require the following information to be provided:
- Traffic impact assessment; and
  - Requirements for off-site improvements.



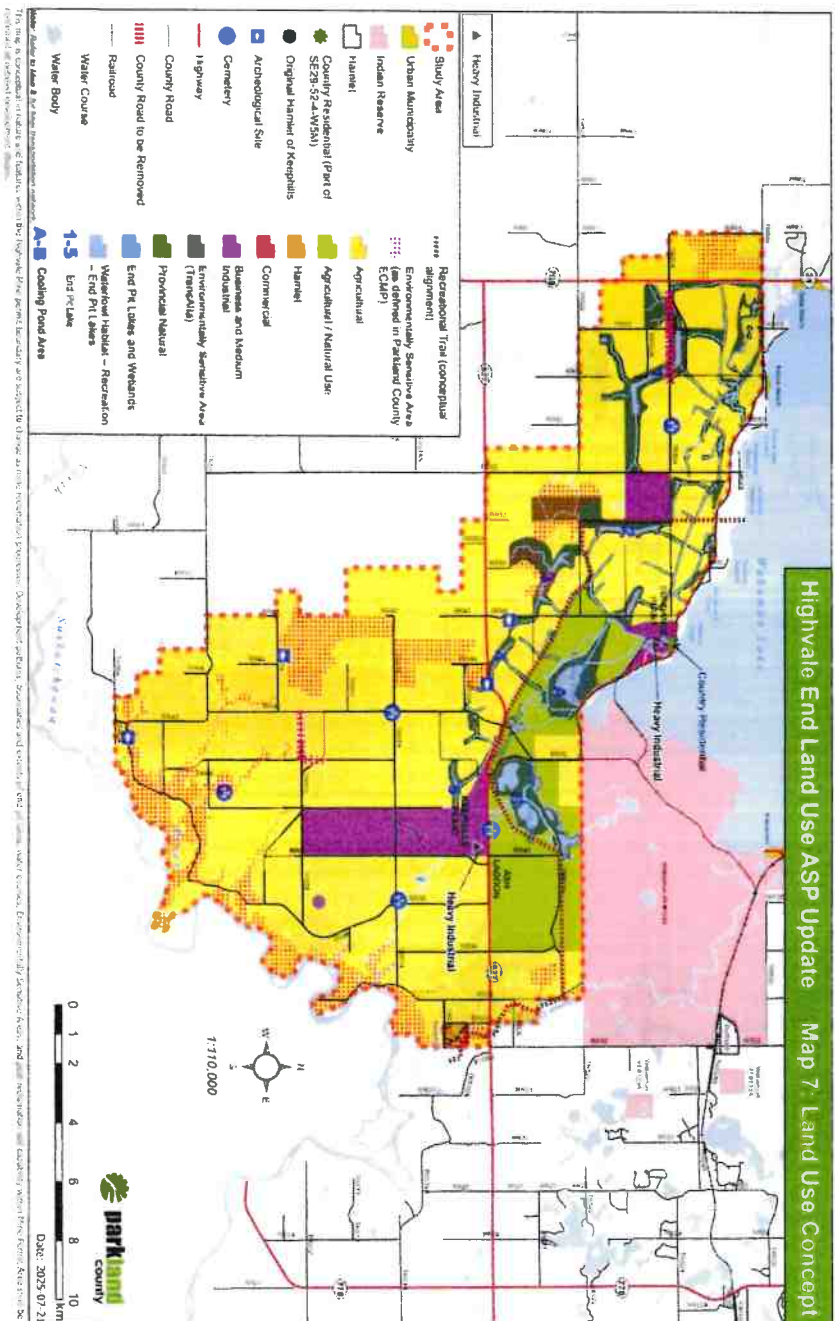
# Noise Impact



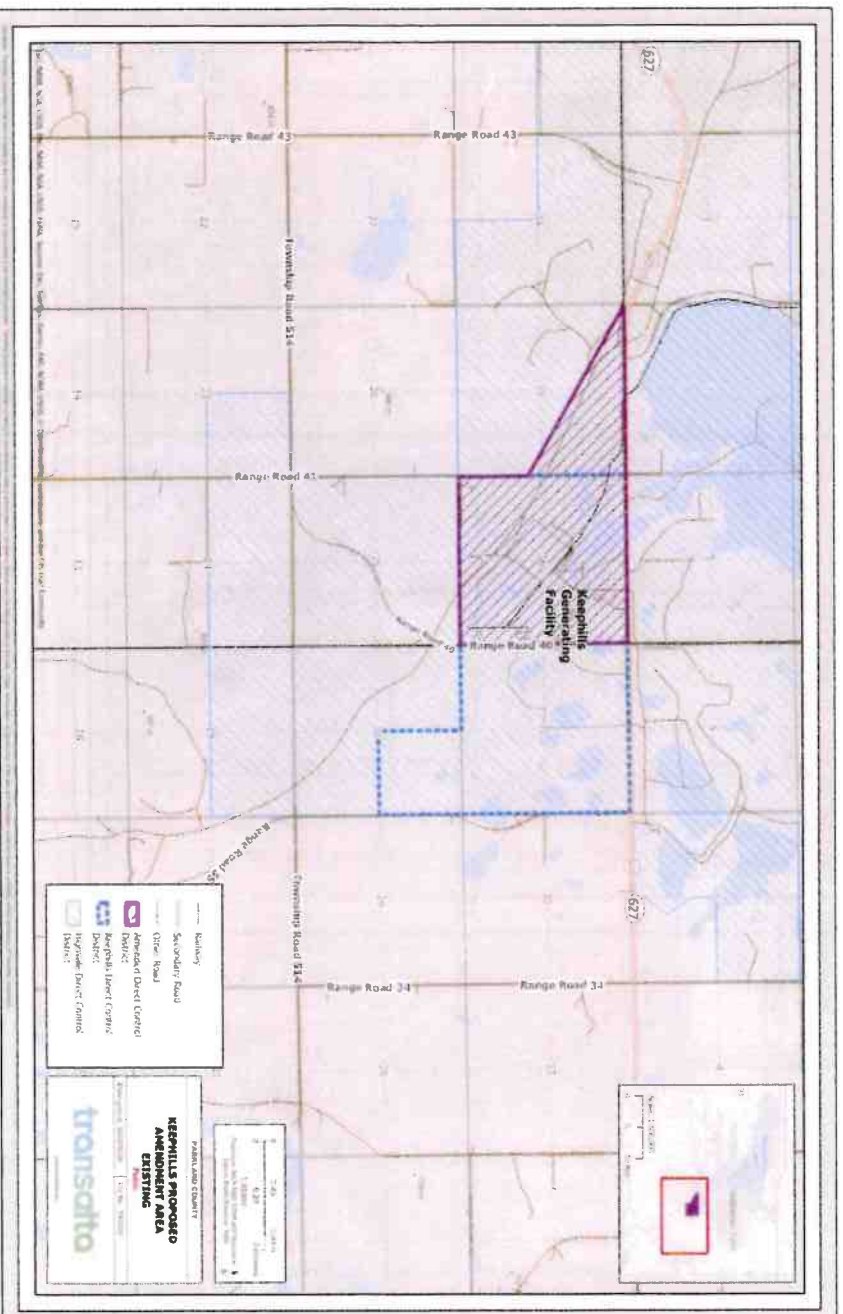
AUC Rule 012  
Basic Sound Level \*

\* Category 1, 1 to 8 Dwellings

# Proposed Highvale End Land Use Area Structure Plan (ASP) Amendments

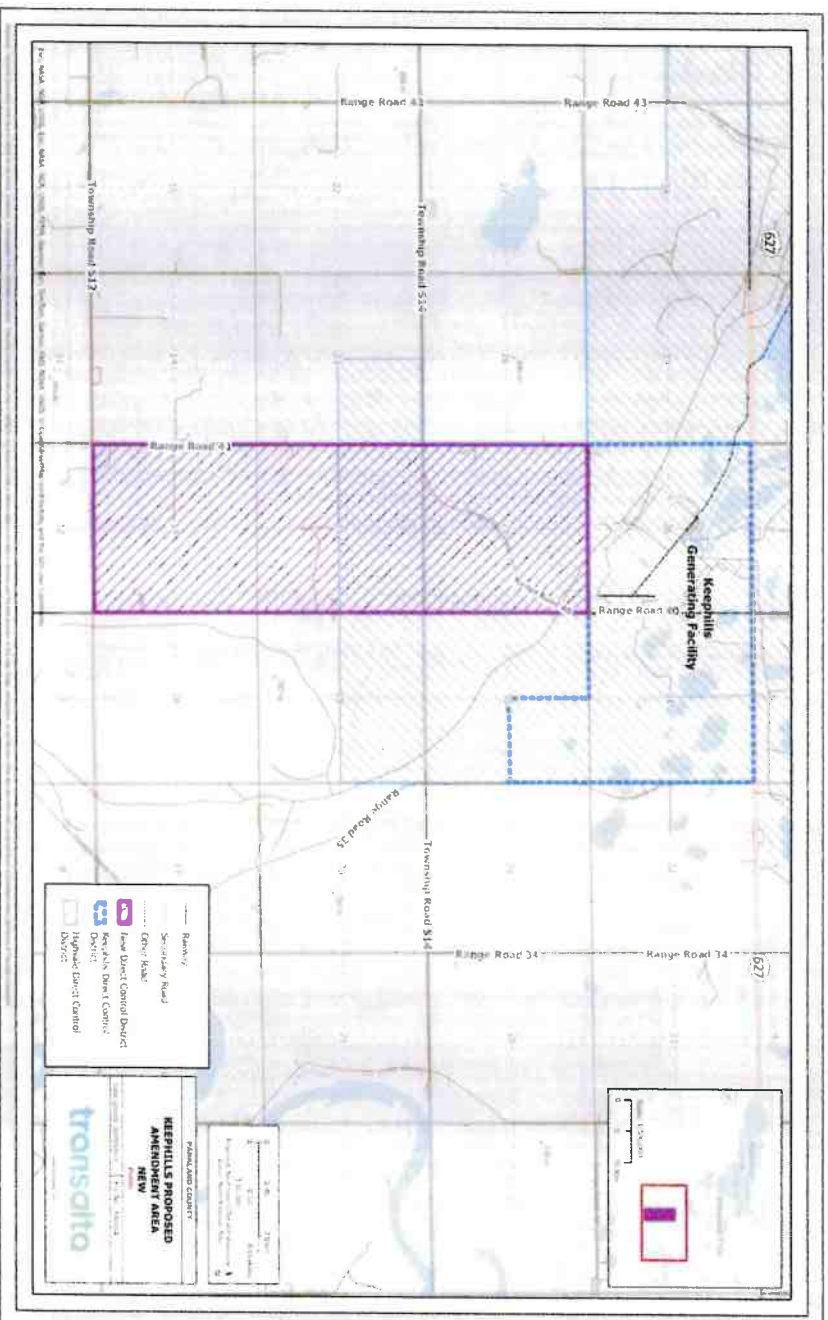


# Proposed Land Use Bylaw (LUB) Amendments – Keepphills

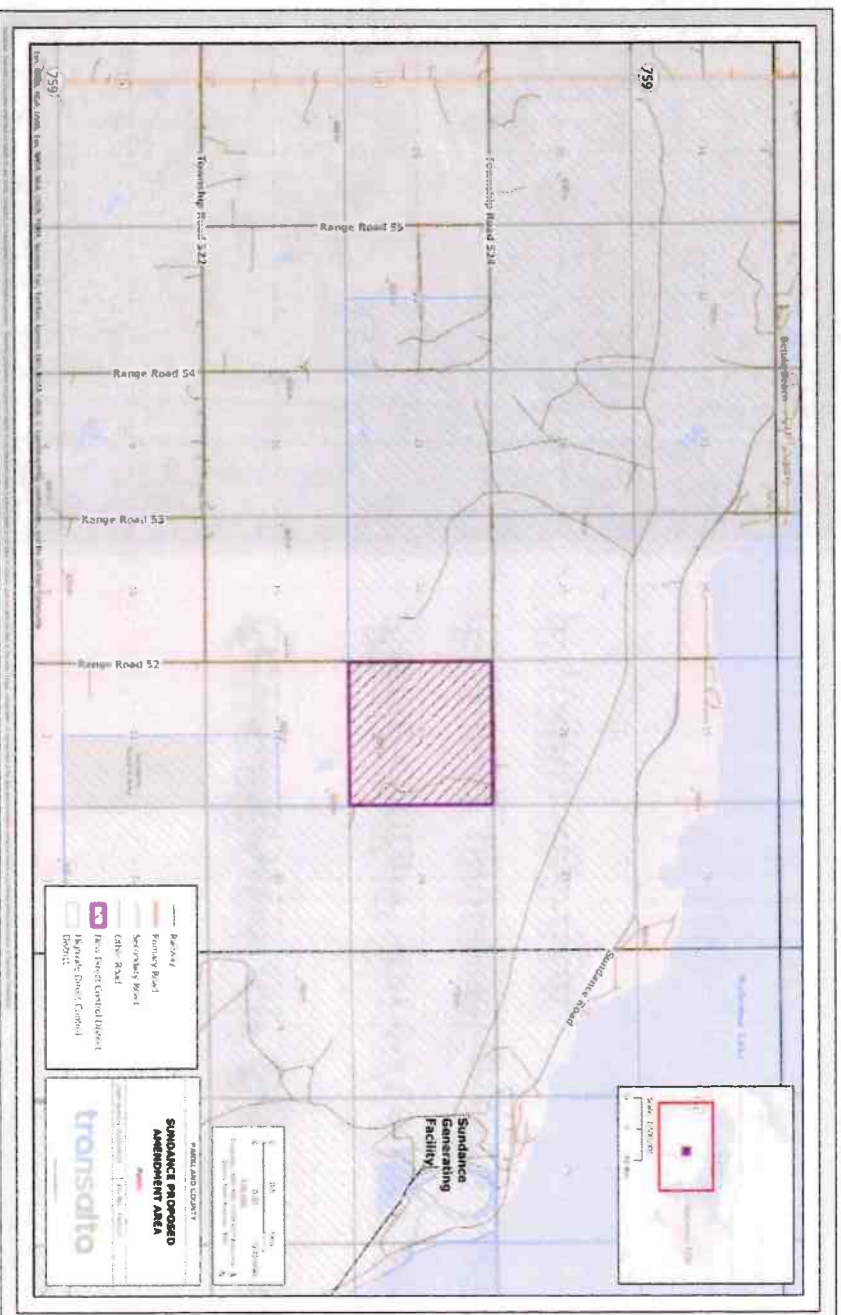




# Proposed Land Use Bylaw (LUB) Amendments – Keepphills



# Proposed Land Use Bylaw (LUB) Amendments – Sundance





## Questions or Comments?

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# Contact Us