From:	David Anderson
To:	Alena Matlock; Jason Schneider; Doug Logan; Jodie Gateman; Alex Horkoff; Laurie Lyckman; Kelly Nelson; christophyer.northcott@vulcan.ca; Nels Petersen; Lansey Middleton
Cc:	[redacted] "trent Bessette"; Trent Kostick; "Ron Girvitz"; [redacted] "Purdon Steve"; "Alan"; "Larry Arnason"
Subject:	Bylaw 2026-007 Public Hearing
Date:	May 28, 2026 9:28:09 PM
Attachments:	June 10th, 2026 Public Hearing Submission.pdf

[redacted]

Alena,

Please find attached my written submission regarding Bylaw 2026-007.

I would also like to formally register to speak in person on behalf of the LBR AI Data Center Committee.

Best regards,

David M. Anderson
[redacted]

To: County of Vulcan Council May 28, 2026

Subject: Letter of Objection – Proposed Palliser Grid AI Data Centre Campus Bylaw 2026-007

Dear Members of Council,

I am writing to you to oppose the proposed land use re-designation from rural to industrial for the proposed AI Data Center Campus – Bylaw 2026-007.

It is my respectful submission that the proposed re-designation is inconsistent with Vulcan County's existing planning framework, including the purposes and intent of the County's land Use Bylaw No. 2020-028, and therefore should not be approved.

Rural Industrial – RI Purpose

The Vulcan County's Land Use Bylaw No. 2020-028, Rural Industrial - RI states that its purpose is "*to allow industrial uses to be located in rural areas provided they do not pose a threat to the environment or create a potential nuisance for residents*". The proposed Bylaw 2026-007 contradicts the Rural Industrial purpose as stated and creates both a threat to the environment and a potential nuisance for residents.

- The proposed Data Processing Operation means a heavily industrial facility will be located on this site. These lands fall within the Vulcan County's Environmentally Significant Area (ESA) and due to this overlap, is deemed a threat to the environment. See Vulcan County Municipal Development Plan ESA Map 24 attached.
- It will also create a Nuisance through the emissions of noise, smoke, dust, odour, heat, light, fire hazard, etc. See Administrative Definitions of a Nuisance – Vulcan County Land Use Bylaw 2020-028 as per below:

> **NUISANCE** means anything that is obnoxious, offensive or interferes with the use or enjoyment of property, endangers personal health and safety, or is offensive to the senses. This could include that which creates or is liable to create a nuisance through emission of noise, smoke, dust, odour, heat, light, fumes, vibration, fire or explosive hazard; results in the unsightly or unsafe storage of goods, salvage, junk, waster or other material; or poses a hazard to health and safety.

The proposed Palliser Grid project is inappropriately sited and represents an incompatible land use as it is located within an ESA and within one mile of recreational lands - areas that are expressly protected under existing County policy. Viable and more appropriate alternative locations exist to the northeast, which would place the project at a greater distance from these protected areas. Additionally, these locations would consolidate the project within an already industrialized area (adjacent to existing wind and solar developments) thus reducing the cumulative effects of industrialization. See Vulcan County Map 19 Resources attached.

In a project of this magnitude, land acquisition costs are comparatively insignificant. Site selection should not be driven solely by the convenience of land ownership by the proponent. Rather, the proponent should identify an appropriate site consistent with County planning policy and acquire or lease the necessary lands accordingly.

Section 13 Industrial Siting Standards

SECTION 13 INDUSTRIAL SITING STANDARDS

13.1 A proposed grouped industrial development or an isolated industrial development considered by the Development Authority to be potentially hazardous, unsightly or offensive should not be approved within 1.6 km (1 mile) of:

(a) an incorporated urban municipality;

(b) a hamlet;

(c) a provincial, regional, municipal park or recreation area;

(d) an environmentally significant area;

(e) an existing or approved rural residence.

13.2 The above restrictions also apply:

(a) within 152.4 m (500 ft) of either side of a provincial highway or a designated scenic, tourist or recreational access road as established in a Vulcan County bylaw;

(b) within such distance of other roads as established by any Vulcan County bylaw;

(c) adjacent to a water body.

Potentially Hazardous

Section 13.1 of the Land Use Bylaw further provides that industrial developments shall not be potentially hazardous where located near sensitive or populated areas.

This concern is particularly significant given the fire risks associated with the proposed project, especially in combination with the fire history of the adjacent solar farm.

There have been previous incidents of grassfires at the Travers Solar site, as recently as March 7th, 2026 where a significant fire was attended by fire services of no less than six local communities. The exact location was confirmed as starting in the solar panels on the SE 7-15-20W4. This fire exhibited fast-moving behavior and jumped RGE RD 205 and consumed approximately 160 acres before it was contained. Source: Freedom of Information and Protection of Privacy Act (ATIA S. 19 and ATIA S. 20).

The AI Data Center is proposing to utilize a Battery Energy Storage System (BESS). Lithium-ion battery fires are known to burn at very high temperatures, release toxic gases, can re-ignite after appearing controlled and are more difficult and hazardous to fight (International Fire & Safety Journal, April 30, 2026). Additionally, there is a risk of thermal runaway with these types of batteries.

There is a single point of egress from the SABC & Little Bow Resort. At the speed given above, a serious grassfire could reach that egress point (the intersection of Highway 529 and Range Road 212) within a few minutes, blocking off access to the highway and ultimate evacuation. Consequently, there is significant public safety risk to residents, visitors, and children attending camp activities. The proximity of this AI Data Center to our egress point is a large concern.

Bylaw 2026-007 is potentially hazardous to the residents of the SABC and LBR communities.

Unsightly or Offensive

There is no official legal definition for "unsightly or offensive" land use in Alberta provincial legislation. Instead, the term is commonly used as a catch-all in municipal Land Use Bylaws referring to uses that create public nuisances that interfere with the normal use, enjoyment, or value of the neighboring properties – as per the nuisance definition above.

13.1 states that developments in proximity to sensitive areas must not be unsightly or offensive. Given the nature of the proposed development and the high level of opposition to the project, one would reasonably assume the project is viewed as unsightly and offensive to the residents that are impacted by this AI datacenter.

I also understand that the proponent has indicated that berming and tree planting will be used to mitigate the visual impact of the proposed industrial development.

This proposal fails to account for the topographical realities of the site (see topography map and photo of the steep grade at end of this letter). The subject lands are situated on a prominent hillside with an approximate vertical elevation gain of 25 metres (82 feet). When combined with the proposed 35-foot structure, effective visual screening would require a berm approaching 120 feet in height. Such a measure is patently unreasonable and impractical, thereby underscoring the significant and unavoidable visual impact of the development, which will remain both prominent and detrimental to the surrounding landscape.

In this case, the effectiveness of berming is central to determining whether the proposal complies with that standard being met. At present, this appears to be based solely on the proponent's assertion, rather than on objective, verifiable evidence.

Given the importance of this issue, I respectfully request that Council require the applicant to submit a **professional visual impact assessment** prior to making a final decision. Such a study should include:

- Cross-sectional drawings illustrating proposed berm heights relative to surrounding viewpoints
- Line-of-sight analysis from key public and residential vantage points
- Photo simulations or visual renderings of the fully developed site
- Existing and proposed elevation data

See example below of an AI visualization of a 35 ft tall data center and natural gas power generating facility that is one mile long and on the proposed land. The overlay picture has been taken from the LBR boat lockers facing north towards the Southern Alberta Bible Camp.

An AI visualization of the proposed Data Center's unsightly & offensive impact on the reservoir

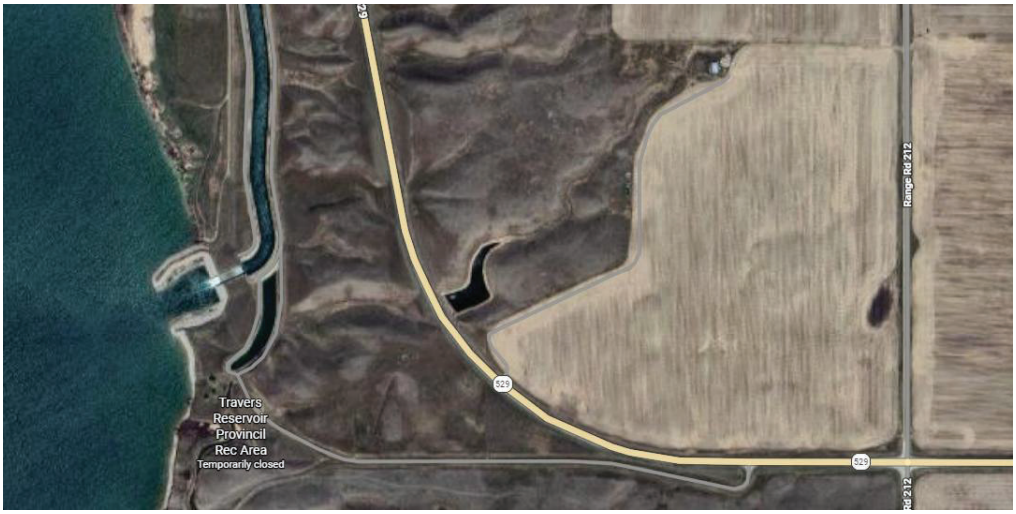


Without this type of visual impact information, it is difficult to see how Council can confidently determine compliance with Section 13.1 or ensure that its decision is well-supported and defensible.

This request is intended to ensure that Council has the necessary information to make a fully informed decision that aligns with its own bylaws and the long-term interests of the community.

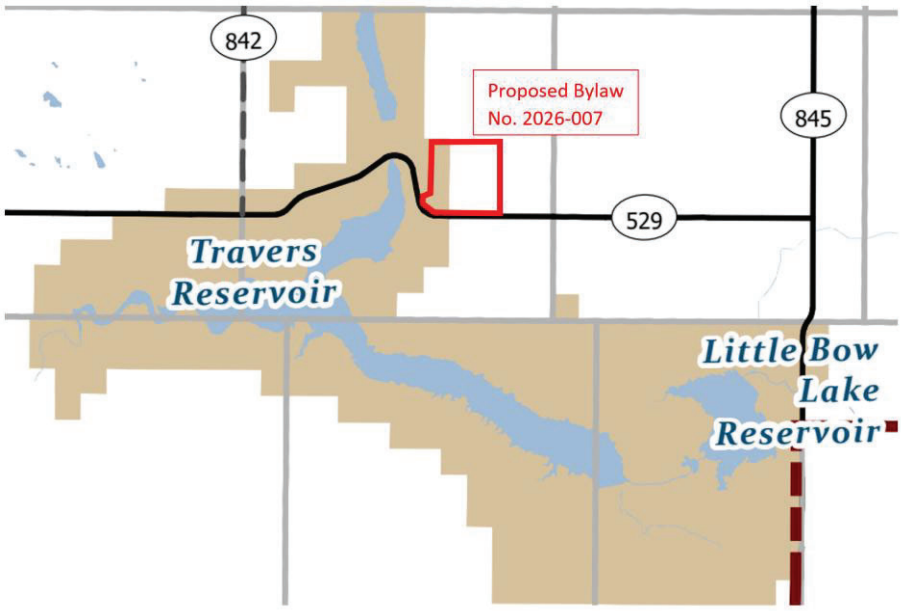
Within One Mile of A Provincial, regional, Municipal Park or Recreation Area

The project is located within one mile of the Travers Reservoir Provincial Rec Area and conflicts with the Vulcan County Industrial Siting Standards. Source: Google Maps



Environmentally Significant Area

The project is located within an Environmentally Significant Area and conflicts with the Vulcan County Industrial Siting Standards. The east side of section 15-15-21W4 is within the ESA. Section 14-15-21W4 is also within one mile of the ESA. See Map 24 - Environmentally Sensitive Areas attached.



Adjacent to a Water Body

The project is also located adjacent to a water body – the Travers Reservoir and again, conflicts with the Vulcan County Industrial Siting Standards. See above Google Maps.

Land Use for the Associated Pump Station and Pipeline Not Contemplated

The County of Vulcan has errored in not including the land use associated with the pumping station and the associated pipeline in this Bylaw. Palliser Grid has stated the water requirements for this project are to be taken from the Travers Reservoir, but have not provided details nor location of the pump station. The pump station will most likely need to be proximal to the Travers Reservoir which is contemplated in the Vulcan County Reservoir Area Structure Plan. The County must evaluate a development based on its full scope and impacts.

The pumping station is an essential component of the proposed development and is not disclosed, evaluated, nor included in the land use decision. Its location near the reservoir, recreational areas, and environmentally sensitive habitat introduces significant environmental and land use impacts that are not being considered. This represents a fundamental flaw in both the application and the approval process.

Conclusion

LBR is not opposed to responsible development within the region. As a matter of fact, LBR has not intervened in prior developments, including multiple wind energy projects and the Travers Solar Farm, from which Vulcan County has derived substantial tax revenue. Notwithstanding this, the LBR community has borne the cumulative impacts of such developments with minimal, if any, corresponding benefit. Community benefit commitments previously advanced by project proponents have ultimately proven to be illusory. The result has been a permanently altered landscape, to the detriment of the natural prairie environment and its visual character.

There is an inherent cost associated with environmental stewardship, and this matter represents a critical threshold. The cumulative effects of existing wind and solar developments, combined with the proposed data centre and associated power infrastructure, are substantial and concerning. The approval of such projects in sensitive areas risks the complete erosion of remaining natural viewscapes and sensitive environmental eco-structure. A comparison of the region's landscape over the past decade clearly demonstrates significant and irreversible change that has occurred (see attached Vulcan County Municipal Development Plan Map 19 Resources).

The proposed project is inappropriately sited and should not be expedited nor advanced through political means. The re-designation is inconsistent with Vulcan County's existing planning framework, including the purposes and intent of the County's land Use Bylaw No. 2020-028, and therefore should not be approved.

I also request that this correspondence be included in the official record for Bylaw 2026-007.

Thank you for your attention to this matter. I look forward to your response.

Sincerely,

On Behalf of the LBR AI Data Center Committee

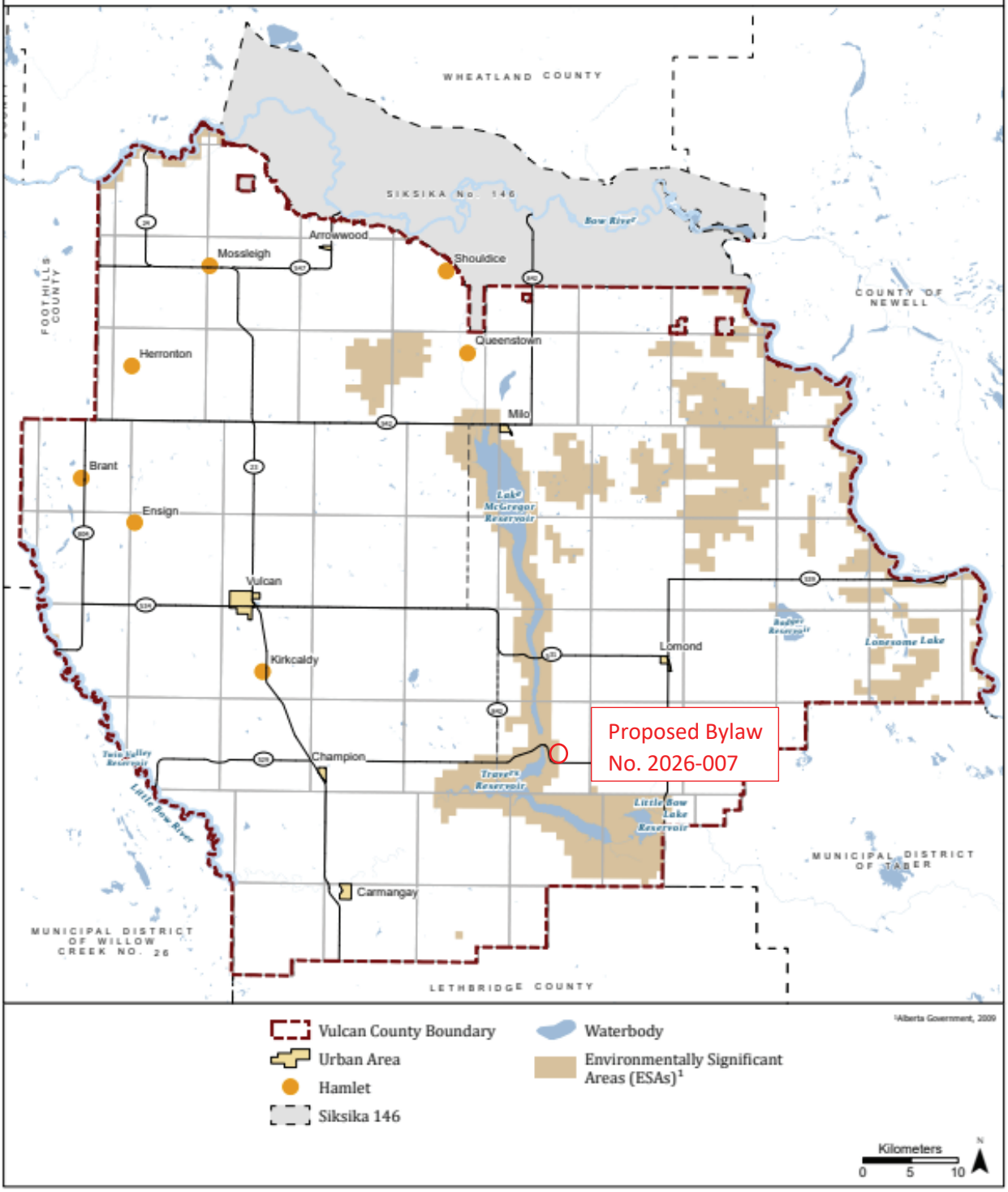
David Anderson
[redacted]

[redacted]

Jason Schneider, Reeve, Division 3	jason.schneider@vulcan.ca
Doug Logan, Division 7	doug.logan@vulcan.ca
Jodie Gateman, Division 1	jodie.gateman@vulcan.ca
Alex Horkoff, Division 2	alex.horkoff@vulcan.ca
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Kelly Nelson, Division 5	kelly.nelson@vulcan.ca
Christopher Northcott, Division 6	christopher.northcott@vulcan.ca
Nels Petersen, Chief Administrative Officer	cao@vulcancounty.ab.ca
Lansey Middleton, Manager of Legislative Services	ea@vulcancounty.ab.ca
Alena Matlock, Development Officer	devassist@vulcancounty.ab.ca

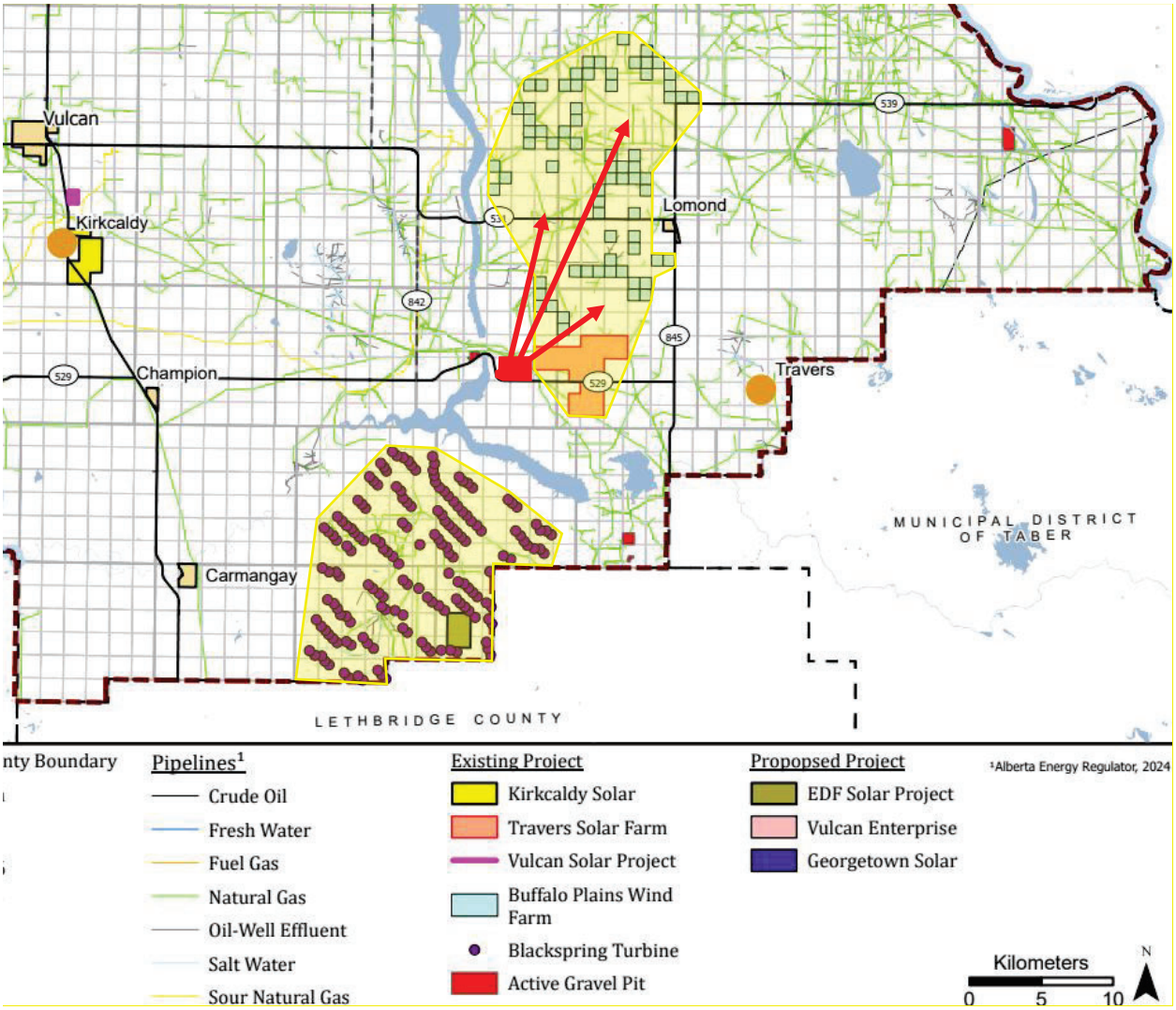
Vulcan County
Municipal Development Plan
Bylaw No. 2025-011

Map 24
Environmentally Significant Areas (ESAs)



Vulcan County Municipal Development Plan – Map 19 Resources

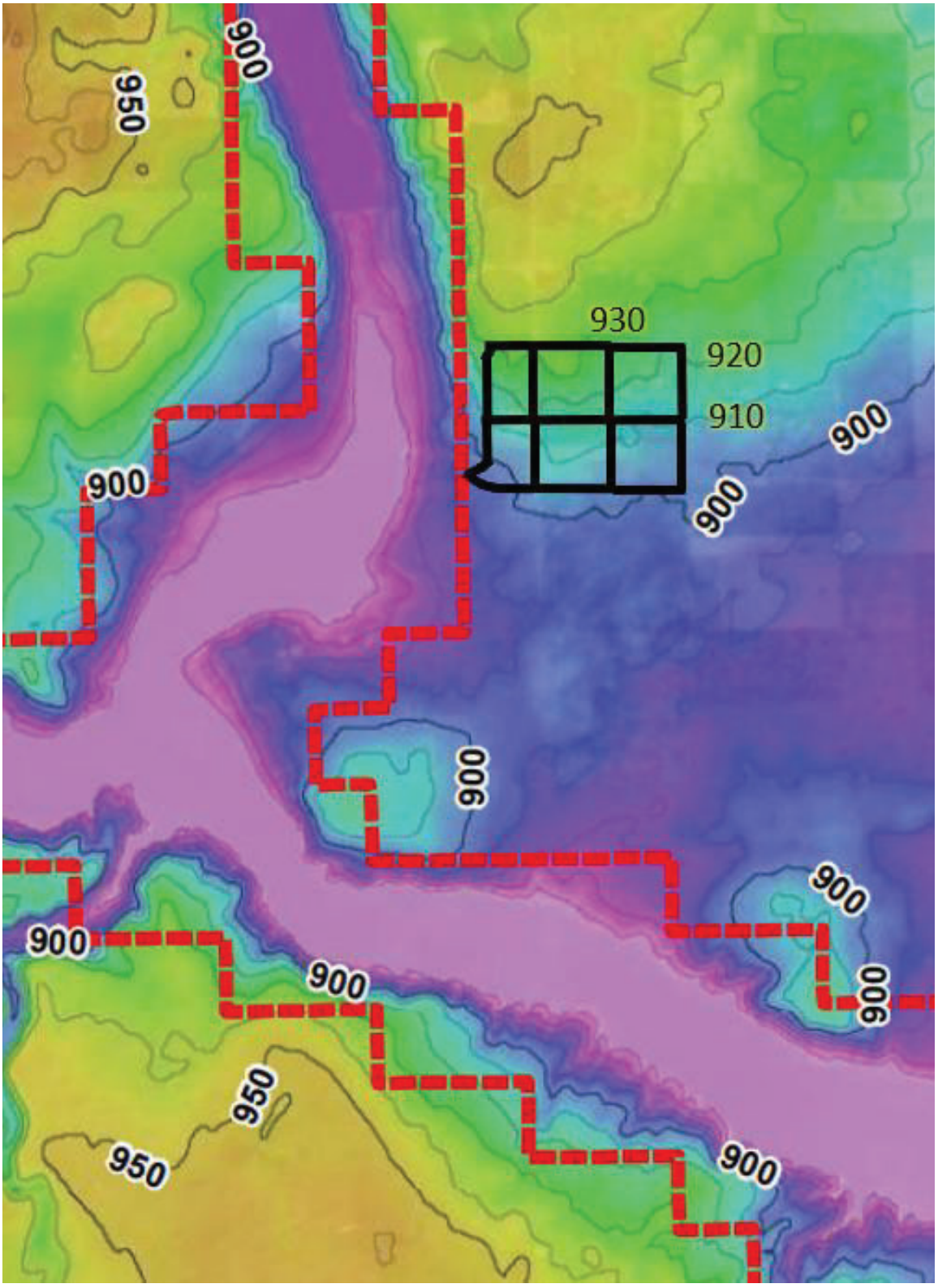
Bylaw No. 2025-011



Note: The proposed project is increasing the cumulative affects of industrialization vs containing it within the existing developed corridor.

Topography map as sourced from the Vulcan County Reservoir Area Structure Plan 2020-015

Proposed land use change area approximated in black outline.



Picture taken at top of hill at approximate 930m contour line showing steep grade of area. Note semi-truck at intersection for relative size comparison.



AI Data Center Committee
June 10th, 2026 Public Hearing

Little Bow Resort



AI Visualization of a 35 ft tall Data Center and Natural Gas Power Generating Facility

Inappropriately Sited Incompatible Land Use

Little Bow Resort

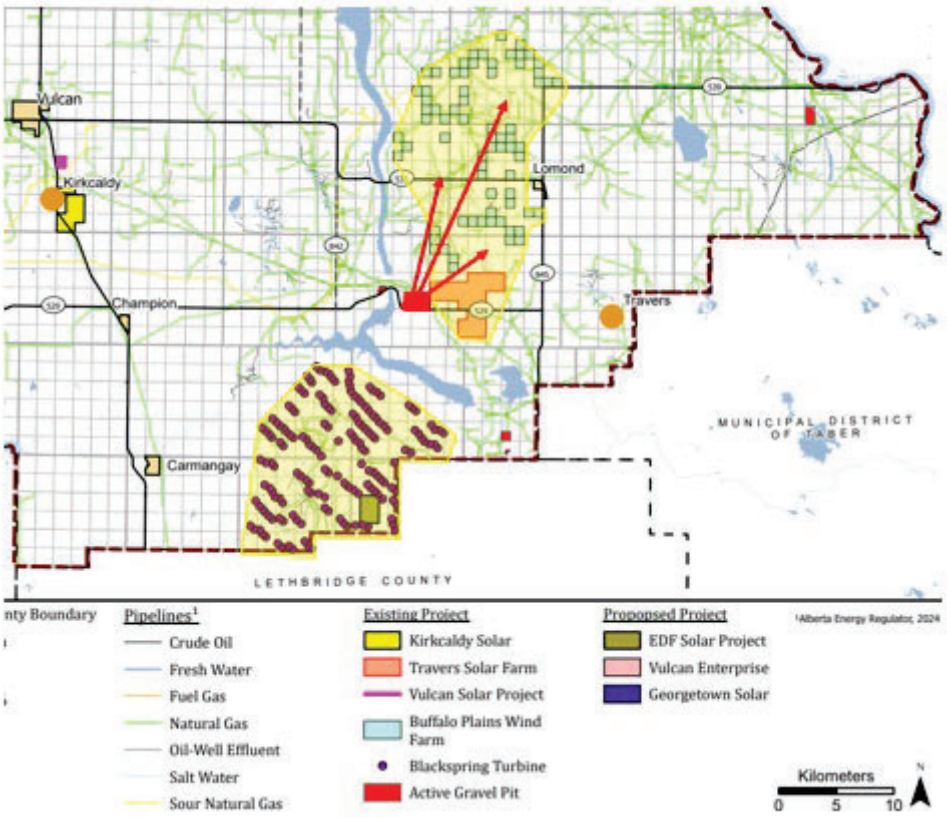
It is my respectful submission that the proposed re-designation is inconsistent with Vulcan County's existing planning framework, including the purposes and intent of the County's land Use Bylaw No. 2020-028, and therefore should not be approved.

The proposed Palliser Grid project is inappropriately sited and represents an incompatible land use as it is located within an ESA and within one mile of recreational lands - areas that are expressly protected under existing County policy. Viable and more appropriate alternative locations exist to the northeast, which would place the project at a greater distance from these protected areas. Additionally, these locations would consolidate the project within an already industrialized area (adjacent to existing wind and solar developments) thus reducing the cumulative effects of industrialization.

In a project of this magnitude, land acquisition costs are comparatively insignificant. Site selection should not be driven solely by the convenience of land ownership by the proponent. Rather, the proponent should identify an appropriate site consistent with County planning policy and acquire or lease the necessary lands accordingly.

More Viable Locations Exist that Balance Land Use Planning

Little Bow Resort



Rural Industrial – RI Purpose

Little Bow Resort

The Vulcan County's Land Use Bylaw No. 2020-028, Rural Industrial - RI states that its purpose is "*to allow industrial uses to be located in rural areas provided they do not pose a threat to the environment or create a potential nuisance for residents*". The proposed Bylaw 2026-007 contradicts the Rural Industrial purpose as stated and creates both a threat to the environment and a potential nuisance for residents.

- The proposed Data Processing Operation means a heavily industrial facility will be located on this site. These lands fall within the Vulcan County's Environmentally Significant Area (ESA) and due to this overlap, is deemed a threat to the environment. See Vulcan County Municipal Development Plan ESA Map 24 attached.
- It will also create a Nuisance through the emissions of noise, smoke, dust, odour, heat, light, fire hazard, etc. See Administrative Definitions of a Nuisance – Vulcan County Land Use Bylaw 2020-028 as per below:

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Bylaw 2020-028
Industrial Siting Standards

Little Bow Resort

Section 13 Industrial Siting Standards

SECTION 13 INDUSTRIAL SITING STANDARDS

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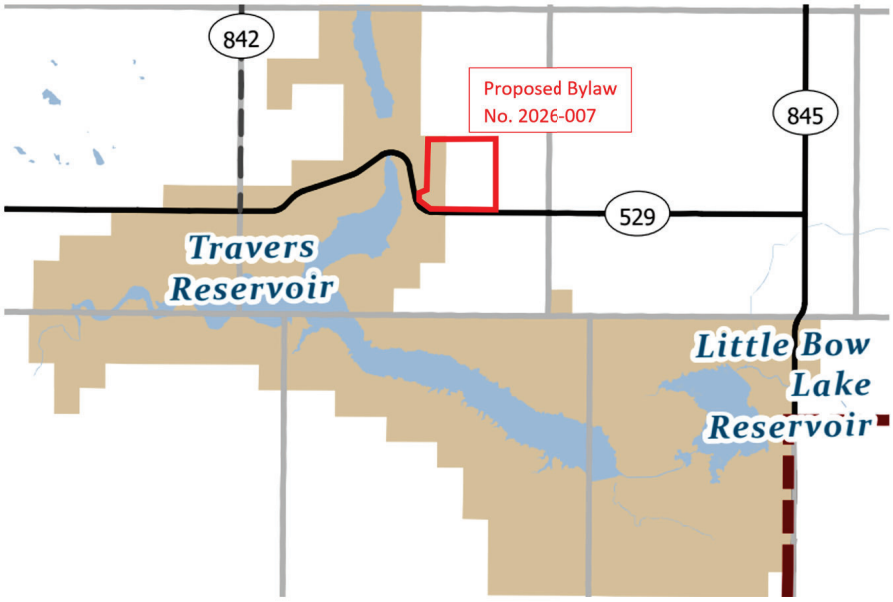
(b) within such distance of other roads as established by any Vulcan County bylaw;

(c) adjacent to a water body.

Environmentally Significant Area

Little Bow Resort

The project is located within an Environmentally Significant Area and conflicts with the Vulcan County Industrial Siting Standards. The east side of section 15-15-21W4 is within the ESA. Section 14-15-21W4 is also within one mile of the ESA. See Map 24 - Environmentally Sensitive Areas attached.



- Within 1.6 km of Travers Reservoir Provincial Rec Area and adjacent to a water body.
- Presents a significant fire hazard for SABC and LBR egress

LBR is not Opposed to Responsible Development

Little Bow Resort

LBR is not opposed to responsible development within the region. As a matter of fact, LBR has not intervened in prior developments, including multiple wind energy projects and the Travers Solar Farm, from which Vulcan County has derived substantial tax revenue. Notwithstanding this, the LBR community has borne the cumulative impacts of such developments with minimal, if any, corresponding benefit. Community benefit commitments previously advanced by project proponents have ultimately proven to be illusory. The result has been a permanently altered landscape, to the detriment of the natural prairie environment and its visual character.

There is an inherent cost associated with environmental stewardship, and this matter represents a critical threshold. The cumulative effects of existing wind and solar developments, combined with the proposed data centre and associated power infrastructure, are substantial and concerning. The approval of such projects in sensitive areas risks the complete erosion of remaining natural viewscapes and sensitive environmental eco-structure. A comparison of the region's landscape over the past decade clearly demonstrates significant and irreversible change that has occurred (see attached Vulcan County Municipal Development Plan Map 19 Resources).

The proposed project is inappropriately sited and should not be expedited nor advanced through political means. The re-designation is inconsistent with Vulcan County's existing planning framework, including the purposes and intent of the County's land Use Bylaw No. 2020-028, and therefore should not be approved.

From:	Brenda Hunik
To:	Alena Matlock; Nels Petersen; Doug Logan
Subject:	regarding Bylaw 2026-007 Public hearing
Date:	May 30, 2026 6:30:13 PM
Attachments:	County letter1 May 30, 2026.pdf

Please accept the attached letter as written submission and objection to bylaw 2026-007, which proposes a land use change that would allow for the development of an AI date centre in the County of Vulcan.

Please also note that I am asking to present to Counsel, in person, at the June 10 public hearing to be held in Champion Alberta at 1pm.

Thank you.

Brenda Hunik
[redacted] Canal Lane
Little Bow Resort
Vulcan County
[redacted]

Sent from my iPad

May 29, 2026

To Vulcan County Counsellors and Administration,

We are Brenda and Michael Hunik, residents at Little Bow Resort since 2023. LBR is our permanent full time home; we are tax payers with voting privileges. Prior to purchasing our home here we had spent the previous 15 years renting land and camping on Travers reservoir on a seasonal basis.

We wanted to ensure the County staff and Counsellors are aware that as residents of the area, we are strongly opposed to the proposed date centre development. Though there are many concerns about this proposal, two primary include permanent environmental impacts and affect to property values.

The reason why we have spent 20 years in this rural recreation area is because of the quality of the reservoir, the natural landscape in the surrounding area, the wildlife and all the enjoyment that comes from this peaceful environment.

It's dark here - no light pollution to affect the clarity of the stars at night, or to mask the northern lights we frequently see. And it's quiet - so still that the yips and yaps of the coyotes at night sound like they're next door, when in fact they are miles away. Sound carries far in the coulees. We hear the birds take off and land on the water. We hear our neighbors enjoying the warm summer evening. No traffic, no constant hum that comes with more dense land use.

Yes there is industry around us, but none close enough to disrupt the near environment and our enjoyment of our home. Some Farming in the spring & fall. The blinking turbines are silent. The solar farm only noticeable if you drive east on 529. These developments have been acceptable because they are sited at a proper distance from the residences, there is no light or noise pollution and they do not access lake water.

The water is the foundation for everything else in this ecosystem. This reservoir was built for agriculture use and water levels are influenced by that use, snow pack and downstream allocations to other irrigation districts. We residents are lucky enough to be tertiary users. We drink this water, swim in the lake during the summer.

Any development that has the slightest impact on the lake and surrounding lands will also impact the entire environment. Regardless of advanced technology and

modern facilities, an industrial user of this magnitude cannot mitigate all the negative outputs: steam containing toxic materials that will cool and fall back into the lake, noise & light pollution, 50 truckloads a day of LNG/LNP, increasing the ambient temperature by up to 6 miles proximity to the development. We cannot risk the long term affects that this development will cause to the local environment. There are sound scientific reasons why this area is zoned rural recreation and that zoning must not change.

Our other concern is in regards to property values. Little Bow Resort has been a haven for escape from work, business and city life for over 30 years. That lifestyle retreat is the primary selling feature of the community. Rural recreation. Our concern is that If you vote to change the zoning and allow this massive industrial complex to build at the proposed site - you will permanently alter that perception for future buyers.

When you drive to the lake on 529 there's a point where you start to come around the north arm and the view of the lake the Bible camp and our resort opens up. That view provides a glimpse of whats more to come - the natural surroundings a stark contrast to the busy world left behind. The view includes the lands to the east of the lake and some of the new turbines. Thats also where the moon comes up over the rise. The view feels welcoming, peaceful, calming. If you allow a ~850acre, 4 story industrial complex on the proposed site, you will forever alter that view and the first impression for potential buyers.

Economic Development may not think that feelings or impressions matter. These are not hard facts or numbers. But these elements are significant drivers for decision making. As a recent purchaser of property here, I certainly would not have bought here if such a large industrial development was situated so close the resort. Even those 2 words don't align. Industry and resort.

These 2 major concerns are not the only ones. Where will 1000 workers live? A staged development will take how many years of construction, increased traffic and noise?

Systems and technology cannot mitigate natural events and human error. The opportunity for fire is immense given the operating temperature of the facility and the mount of fuel stored to be stored on site. Why would we take the risk - however slim - of exposing ourselves to such a toxic event, the effects of which would be catastrophic and would permanently alter the environment for many

miles. Residents of LBR would be trapped in our homes with no means to escape. No amount of tax revenue is worth risking lives.

In closing, we believe this development does not belong in this area. It does not align with the surrounding land use and may cause irreparable damage to residents health & safety, our property values and our ability to enjoy our home. And there is sufficient scientific evidence to prove that similar AI data centers do in fact damage the environment.

We respectfully request the County to maintain the existing land use designation and reject this proposal.

Sincerely

Brenda & Mike Hunik
[redacted] Canal Lane
Little Bow Resort
County of Vulcan.

From: Carolyn Gunderson
To: Alena Matlock
Subject: Bylaw 2026-007 Public Hearing
Date: June 2, 2026 8:38:02 AM
Attachments: Land Use Redesignation.pdf

[You don't often get email from [redacted] Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Hello Vulcan County,

Here is my letter regarding bylaw 2026-007. I would also like to speak at the meeting on June 10th in Champion. I will be there in person. Thank you.

[redacted]
Vulcan County Address: [redacted] Canal Lane, Little Bow Resort

Carolyn Gunderson

Carolyn & Darren Gunderson
[redacted] Little Bow Resort
Vulcan County, Alberta

May 30, 2026

Vulcan County Administration Building
Box 180, 102 Centre Street
Vulcan, AB T0L 2B0

RE: PROPOSED BYLAW NO. 2026-007

Dear Alena Matlock,

I am writing as a resident of Vulcan County having resided in Little Bow Resort (LBR) since 2003. I currently own 1 home and 1 lot within the community. I have read the proposed land use redesignation to allow for an AI Data Centre to be built at the corner of RR 212 and highway 529. This is the corner to which the residents of LBR and Southern Alberta Bible Camp (SABC) utilize to get to our homes. I have a few concerns regarding the land use redesignation and they are noted below.

1. The proposal itself has a number of items that are left incomplete and not addressed by Palliser Grid. Bylaw 2020-028 section 62.1 has a number of requirements that must be met prior to the land use being amended. Multiple items on this list have been omitted including but not limited to the consistency with the South Saskatchewan Regional Plan, compatibility of the proposal of with surrounding uses and zoning and a diagram with pertinent information completed by a professional.
2. There are two volunteer fire departments within the vicinity, Lomond and Champion. This would not suffice in the event of major event at the AI Data Centre. The residents within LBR and SABC might not be able to evacuate as this is the only road out of the resort. The fire that happened within the Solar Farm on March 7, 2026 required 5 Stations to respond. What does the emergency plan look like for the AI Data Centre housing diesel?
3. The change to a Rural Industrial must not pose a threat to the environment as per bylaw 2020-028. There currently is no evidence in the proposal to show that the environment will not be affected. Researchers at Cornell University show that the proposed AI Data Centre can heat the land by 2 degrees Celsius but some as high as 9.1 degrees Celsius. This can be felt for as far away as 10km away altering microclimates and affecting people and animals that live nearby. This information would also show that the lake will be warmed and could harm the fish and fauna

presently living in the water. There is also an environmental sensitive section nearby that is not mentioned. Palliser Grid has failed to provide any environmental data in the proposal.

4. Although Bow River Irrigation District (BRID) has provided a water license for Palliser Grid, the City of Calgary has instituted a water reduction program as it worries about the water level in the Bow River. If the City of Calgary is worried about the level of the water and ensures its residents use less, is changing the By Law to allow for an AI Data Center counter intuitive to this initiative? In the summer 2024 the water was dangerously low and by July we had trouble getting boats into the water. Irrigation demand was high due to the dry farmland. BRID donated bricks to rebuild LBR boat launch in the winter to help extend the season as they realized LBR was directly impacted by the limited water. With the summer period already the most water stressed period due to farming irrigation the AI Data Centre will result in even higher water stress levels due to increased power demands and cooling requirements. More clarity is need on how much water will be drawn, but the proposal remains silent on water usage. We know demand will be substantial and local impacts significant. What discussions have occurred with BRID?
5. The change to Rural Industrial also states that it must not provide a nuisance for residents. While there are noise targets listed in the proposal, there is no mention of light, or pollutants such as dust from construction and how they will be addressed, especially with the wind that often occurs. The proposal remains silent on these concerns.

As a key policymaker for Travers Reservoir, Vulcan County plays a vital role in prioritizing the consideration of near-term and long-term resource challenges and potential impacts of Palliser Grid's request for land redesignation. Currently there is not enough analysis completed within the documents provided to understand the impacts to cumulative water and energy impacts along with environmental concerns within the lake's ecosystem.

I therefore request that this proposal is tabled and Vulcan County request more information from the applicant prior to approving. A decision of this nature requires more thorough water and energy stewardship discussions and should not be rushed.

Personally, I do not want to be surrounded by an industrial building in the middle of my peaceful retreat. This is not why I purchased a home in Vulcan County.

Sincerely,

Caroyn & Darren Gunderson

From: Sylvia Farrant
To: Alena Matlock
Subject: Verbal In-Person Presentation including Written Submission - Sylvia Farrant
Date: June 3, 2026 8:03:03 AM
Attachments: Vulcan rezoning June 10.docx

[redacted]

Attached is my written presentation, and Please add me to the list of in person presenters at the June 10 Public Hearing in Champion.
Thank you for this opportunity!
Sylvia Farrant
[redacted]

Public Hearing Vulcan County Proposed Bylaw no. 2026-007

Redesignation of 865+/- acres from Rural General to Rural Industrial and to develop the property in accordance with the provisions of the Rural Industrial Land Use District.

"Proposed designation and use of the property Palliser Grid is applying to rezone the subject lands from Rural General (RG) to an Industrial designation (General Industrial intent) to enable development of a hyperscale capable AI data centre campus and supporting utility infrastructure. **This submission is provided for rezoning review**."

My name is Sylvia Farrant, and I am a part time resident and tax payer at Little Bow Resort. I would like to explain briefly how I will be affected by this proposed bylaw change.

Industrial Rezoning

<u>Nuisance</u>

County bylaws state that industrial use is allowed if they "do not create a potential nuisance for residents".

Regardless of distance from this proposed industrial site, a key concern for residents of Little Bow Resort and users of the Bible Camp is our exit road at the immediate intersection of this proposed industrial site. We know from other fires in the area, given the wind, and given dry grass conditions, fire travels very quicky. The only way to exit Little Bow Resort and the Bible Camp would be to drive towards, and possible through, a fire at this location. The traffic from 200 plus homes would clearly impede fire fighting activity, not to mention put lives at risk!!

The industrial rezoning, for any purpose, will likely lead to greater electricity use. Not only will that lead to more power outages and brown outs in the area, but history has shown that power rates will

increase. The proponent has stated locally produced power will be used, and yet the operators of the local solar farm were unaware of this request for industrial rezoning, and have stated the power generated is already spoken for. Does that mean even more solar farms and wind farms will be needed to feed this industrial use, or can we expect a major power station with its incumbent noise, light, and air pollution and the risk of diesel or natural gas on site?

There are tremendous safety issues both during the construction phase and during operation. The noise, light, dust and air pollution WILL reach our homes.

Clearly there is a "Potential Nuisance for Residents"!!

<u>Environment</u>

County bylaws state that industrial use is allowed if they "do not pose a threat to the environment".

This location is in an Environmentally Significant Area, within a mile of a regional recreation area known for migratory birds, and other wildlife. The recreation area is used extensively by families fishing and camping. The site itself includes a number of springs, dugouts, ponds and related wetlands. It does not meet the requirements of the Water Act and the Wetland Policy, as stated in the County's land use bylaw. There are issues of water pollution from any industrial use, including sewage and waste water seepage in this sandy area adjacent to a major water way. There may be effects on the level, and temperature of Travers Reservoir, which will then affect fish, wildlife, and vegetation in and around the water. Light pollution will also have a significant effect on the birds and bats, possibly leading to an increase in grass hoppers and other harmful bugs. We have already seen a significant decrease in the bat population as a result of the wind farms.

Clearly there is a "Threat to the Environment"!!

Site Suitability

Is this the most appropriate site for any industrial purpose?

This site is close to water but is almost 900 ft in elevation. To get water to this height, for any purpose, would require large pumps and a power supply (possibly diesel) on or near the edge of the Travers Reservoir. Or, given the large fluctuations in the Reservoir, the pumps would need to be situated part way up a very steep bank. Are you allowing diesel generators and extremely large water pumps at a very popular fishing and regional recreation area. There is a significant spill risk to a major farming irrigation reservoir.

Once the pumps are at the water, it will require drilling below the canal spillway and below Highway 529 to get the water to site. Highway 529, to the east of Travers Reservoir, as you climb the hill to range road 212, is already showing significant dips and heaves from heavy traffic and from the seepage below Highway 529 from the ponds on the east side of the highway. Any further industrial traffic will have a significant detrimental effect on this road. I assume, based on County by-laws that the proponent has a plan to upgrade and repair Highway 529.

Vulcan county bylaws require details regarding the proposal to be submitted, including the "suitability of the site". Clearly it is not a suitable site. "Availability of services." Clearly fire and water treatment services are not sufficient. "And analysis of surface drainage". Clearly drainage is a major issue, both to Highway 529 and to the Travers Reservoir.

I am not opposed to an industrial site in Vulcan County, but this location is distinctly unsuitable for anything other than recreation development and farming. More appropriate land is available closer to existing industrial uses, including wind and solar.

Thank you for your time and consideration.

Sylvia Farrant

[redacted]

[redacted]

From:	Trent Kostick
To:	Alena Matlock
Subject:	Verbal In-Person Presentation including Written Submission - Trent Kostick - June 10 2026 Public Hearing - Bylaw 2026-007 Land Use Bylaw Amendment Redesignation from Rural General to Rural Industrial
Date:	June 2, 2026 8:44:42 PM
Attachments:	Outlook-tqxyddpu.png LBR - Public Hearing Presentation - Trent Kostick - June 10 2026 Final TK.pptx

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Please accept this as my request to present and In-Person Verbal Presentation at this public hearing. My presentation (written submission) is attached in a PowerPoint format.

Please confirm that you have received this and that I will have an option to present this material in person.

Best regards,

Trent Kostick, P.Eng.

[redacted]

PUBLIC HEARING - PROPOSED BYLAW NO. 2026-007

1:00 p.m., June 10th, 2026
Champion Community Hall

Trent Kostick
[redacted] Lakeside Drive,
Vulcan County, AB
T0L 0R0

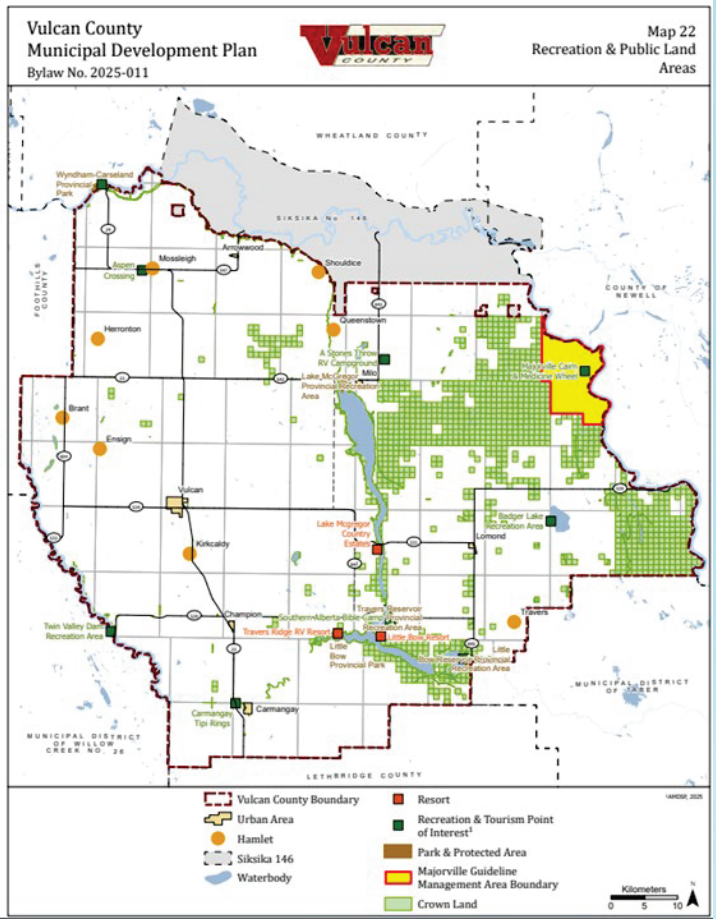


This photo was taken March 29, 2026; slightly overcast. Location is the NE corner of the intersection of Highway 529 and RR 212. Site of potential Data Center.

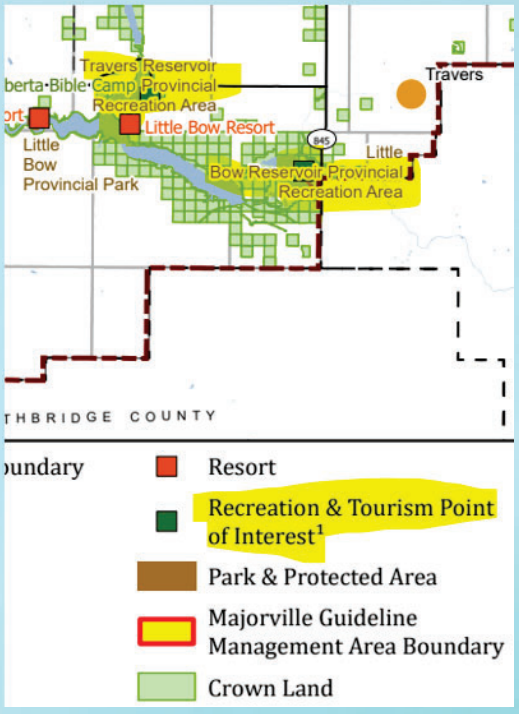
Why The Concern With This Redesignation?

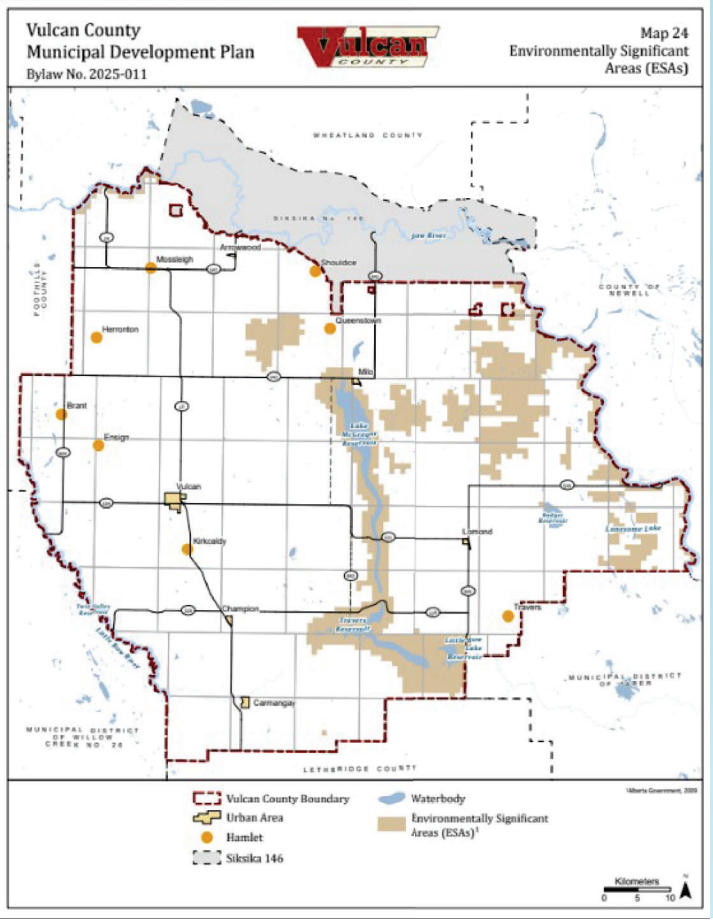


- It is only 2.3 km (1.45 miles) from point of picture taken in the previous slide to Little Bow Resort
- It is only 2.0 km (1.25 miles) from the closest point of the land proposal rezoning to the closest corner of the Resort

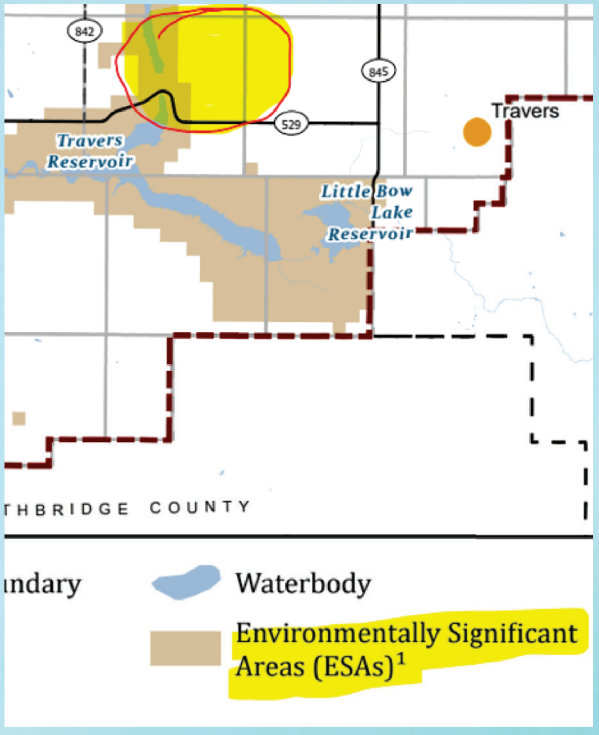


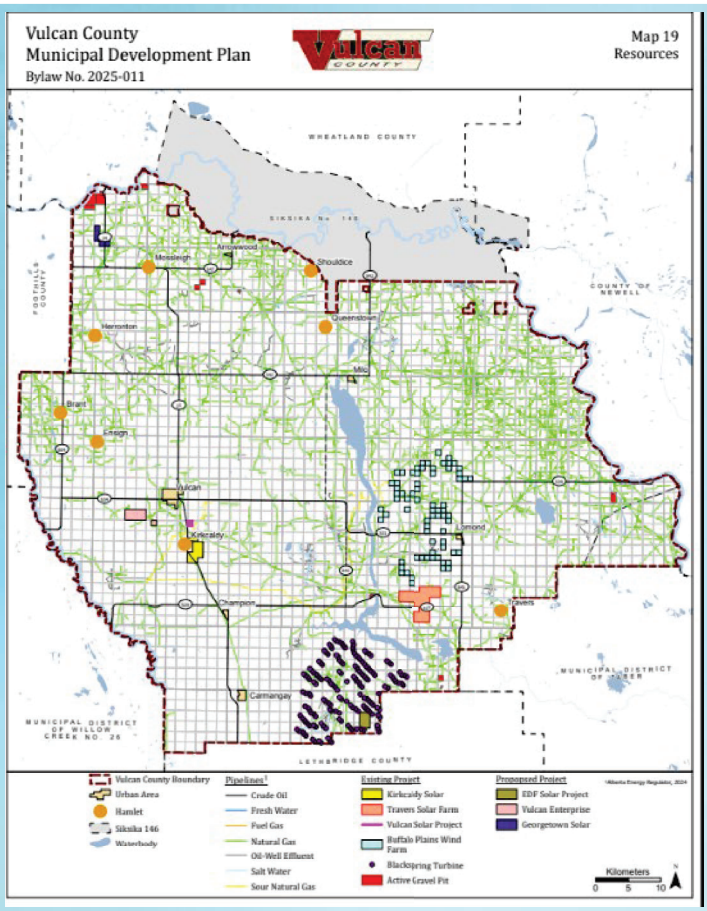
The land parcel is right next to a Recreation & Tourism Point of Interest



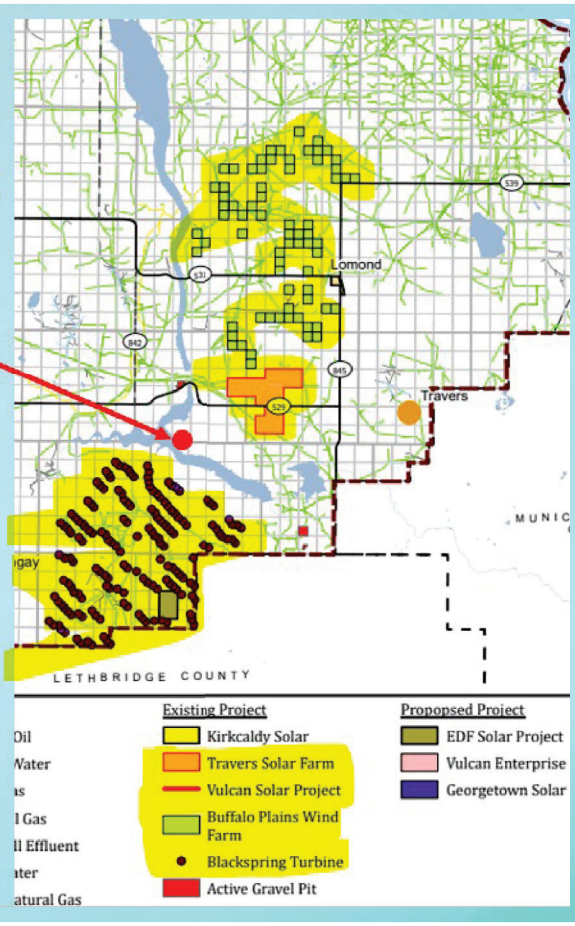


The land parcel is also right next to Environmentally Significant Areas (ESAs)





Cumulative Effects
→ Starting to look like an industrial corridor...



From Page 52 of the Proposed Redesignation Bylaw 2026-007

INDUSTRIAL DEVELOPMENT CANNOT BE APPROVED HERE BASED ON BYLAW 2020-028



SECTION 13 INDUSTRIAL SITING STANDARDS

13.1 A proposed grouped industrial development or an isolated industrial development considered by the Development Authority to be potentially hazardous, unsightly or offensive should not be approved within 1.6 km (1 mile) of:

(a) an incorporated urban municipality;

(b) a hamlet;

(c) a provincial, regional, municipal park or recreation area;

(d) an environmentally significant area;

(e) an existing or approved rural residence.

13.2 The above restrictions also apply:

(a) within 152.4 m (500 ft) of either side of a provincial highway or a designated scenic, tourist or recreational access road as established in a Vulcan County bylaw;

(b) within such distance of other roads as established by any Vulcan County bylaw;

(c) adjacent to a water body.

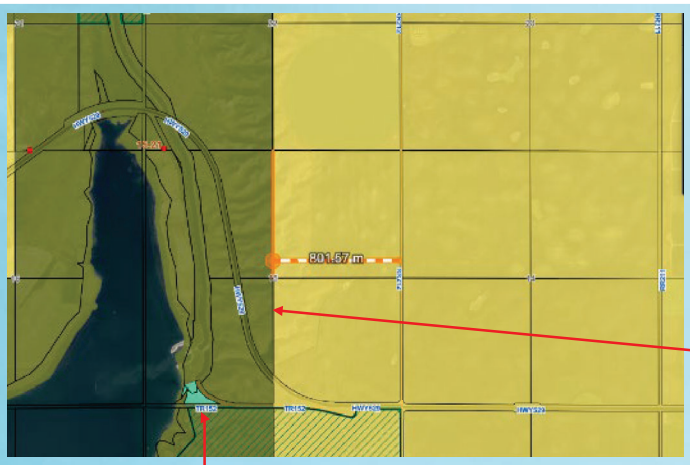
13.3 Applications for development expansion or for separate parcels in an area designated for industrial may be approved or recommended for approval provided that:

(a) the area of any proposed parcel is a minimum of 0.4 ha (1 acre);

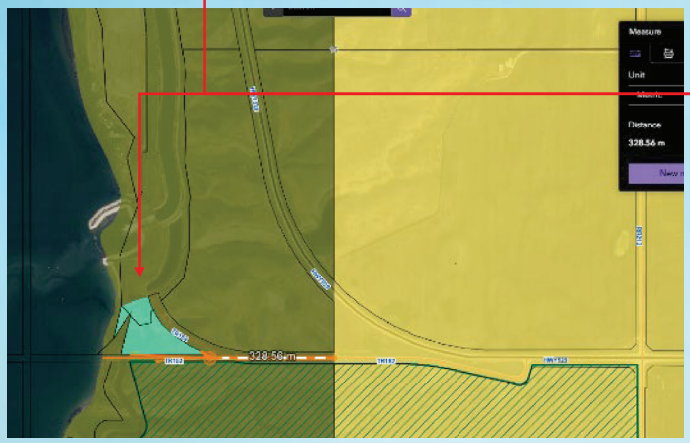
(b) the proposed development or parcel will be serviced to the satisfaction of the Development Authority;

(c) the proposed use or operation will be developed in such a manner that no run-off water can directly enter any water body, groundwater, irrigation system or public roadway ditch;

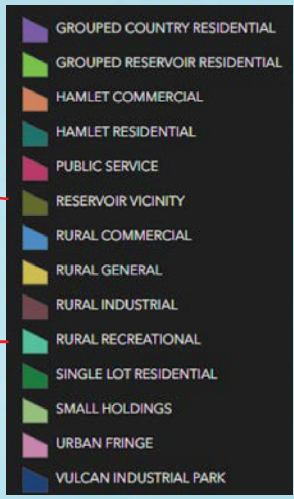
(d) there will be adequate provision for water treatment, temporary waste storage facilities and arrangements for waste disposal in accordance with standards set by the appropriate provincial departments and other approving authorities.



801.57m from RR212 to Reservoir Vicinity – the land in this application actually abuts onto the “Reservoir Vicinity”

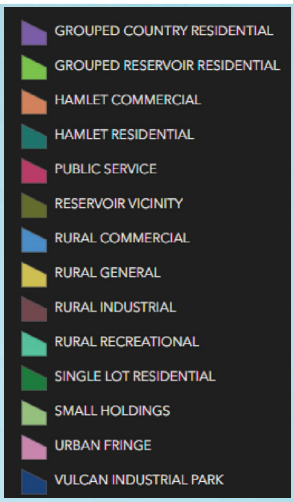


328.56m (0.204miles) from nearest corner of land in the application to Rural Recreational Land





1,161.39m (0.722miles) from nearest corner of land in the application to Rural Recreational Land



SECTION 13 INDUSTRIAL SITING STANDARDS

13.1 A proposed grouped industrial development or an isolated industrial development considered by the Development Authority to be potentially hazardous, unsightly or offensive should not be approved within 1.6 km (1 mile) of:

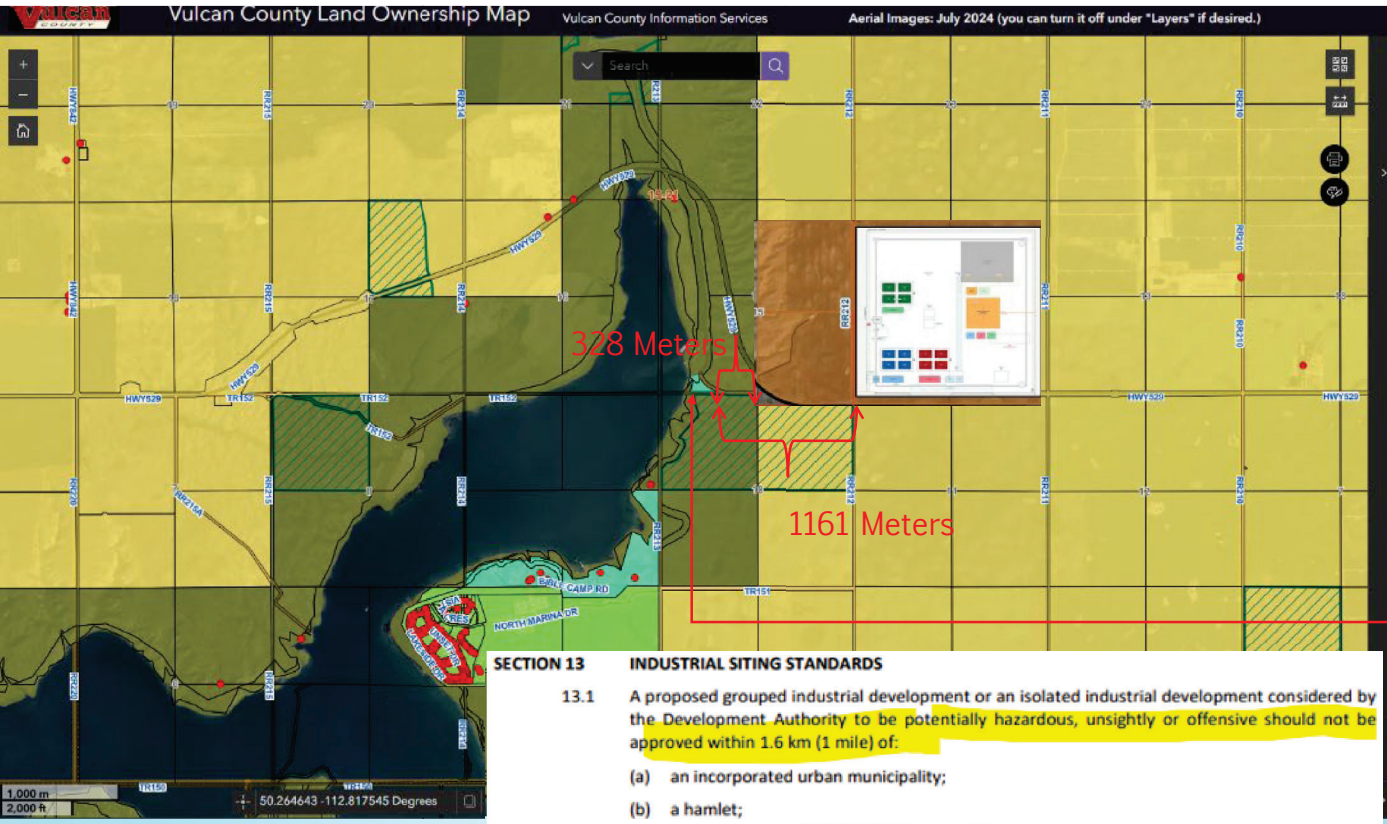
(a) an incorporated urban municipality;

(b) a hamlet;

(c) a provincial, regional, municipal park or recreation area;

(d) an environmentally significant area;

(e) an existing or approved rural residence.



SECTION 13 INDUSTRIAL SITING STANDARDS

13.1 A proposed grouped industrial development or an isolated industrial development considered by the Development Authority to be potentially hazardous, unsightly or offensive should not be approved within 1.6 km (1 mile) of:

(a) an incorporated urban municipality;

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(c) a provincial, regional, municipal park or recreation area;

(d) an environmentally significant area;

(e) an existing or approved rural residence.

Stategic Priorities # 6 Safe Communities

As a rural community, Vulcan County can be faced with emergencies that rely on both volunteer and professional resources. Protection of our community is accomplished by six fire departments (Northwest, Milo, Lomond, Carmangay, Champion and Vulcan Fire), four RCMP detachments (Vulcan, Vauxhall, High River, and Strathmore), and the Vulcan County Community Peace Officer Program. To continue to provide protected communities, Vulcan County will undertake the following objectives:

Key Action Item	Lead Role	Initiated	Status	Key Measures
Continue with education as a primary value in regard to enforcement.	Protective Services	2018-2022	Ongoing	✓ Stakeholder Satisfaction ✓ Council Satisfaction
Training and exercises through the Vulcan County Regional Emergency Response Partnership.	CAO – RDEM Protective Services	2022-2026	New	✓ Stakeholder Satisfaction ✓ Council Satisfaction
Engage RCMP on comprehensive policing and crime prevention strategy for the County.	Protective Services Council	2022-2026	New	✓ Stakeholder Satisfaction ✓ Council Satisfaction
Continue to pressure the Province for better rural ambulance servicing in our region.	Council CAO Protective Services	2022-2026	New	✓ Stakeholder Satisfaction ✓ Employee Satisfaction ✓ Sustainability ✓ Process and System Improvements
Continue to be fully compliant with the NFPA standards to operate at the service levels identified in the Bylaw.	Protective Services	2014-2017	Ongoing	✓ Stakeholder Satisfaction ✓ Employee Satisfaction ✓ Sustainability ✓ Process and System Improvements
Explore Firefighter recruitment incentives to ensure sufficient staffing at all fire halls.	Protective Services CAO	2022-2026	New	✓ Stakeholder Satisfaction ✓ Employee Satisfaction ✓ Sustainability
Increase the delivery of prevention, and preparedness amongst our aging population.	Protective Services	2022-2026	New	✓ Stakeholder Satisfaction ✓ Process and System Improvements
Build out the investigation program by purchasing equipment that will speed up the process and provide for in-depth reports. The camera's that the realtors use to give 360-degree views or walk-through pictures, drones for aerial assessment.	Protective Services	2022-2026	New	✓ Stakeholder Satisfaction ✓ Process and System Improvements
Develop Council awareness of the Incident Command System, as well as Council awareness of obligations regarding emergency management in legislation.	CAO RDEM Council	2022-2026	New	✓ Stakeholder Satisfaction ✓ Council Satisfaction

Safety, Theft, and Emergency Response

Has the Vulcan County completed studies on potential theft and community safety /emergency response which can come with Industrial Zoning or Data Centers?

<u>How will that be monitored and policed?</u>
<u>What are the cost implications?</u>

Area Structure Plan Slides

VULCAN COUNTY

Vulcan - Alberta

BYLAW 2020-015

Being a Bylaw of Vulcan County in the Province of Alberta to adopt the McGregor, Travers, Little Bow Area Structure Plan.

WHEREAS Section 633 of the Municipal Government Act, being Chapter M-26 of the Revised Statutes of Alberta, 2000, and amendments thereto, whereby a municipality may pass a bylaw for municipal purposes of adopting an Area Structure Plan;

AND WHEREAS the Council of Vulcan County has identified the McGregor, Travers, Little Bow Reservoirs, as having potential for increased development;

AND WHEREAS development, redesignations, and subdivisions proposals, must recognize the potential conflict of reservoir use;

AND WHEREAS the Council of Vulcan County wishes to implement development, redesignation, and subdivision guidelines which take into account the special nature of the area;

NOW THEREFORE under the authority and subject to the provisions of the Municipal Government Act, Revised Statues of Alberta 2000, Chapter M-26, as amended, the Council duly assembled does hereby enact the following:

1. That Vulcan County Council does hereby adopt the McGregor, Travers, Little Bow Area Structure Plan as shown on Schedule A
2. Bylaw 97-018 is hereby rescinded.
3. This Bylaw shall take effect upon third and final reading hereof.

Received first reading this 17 day of July, 2020

Jason Schneider, Reeve

Nels Petersen, CAO



SECTION ONE

Planning Context

1

This section outlines the policy framework that enables and directs the Reservoir ASP and compliance with the County's statutory Planning documents.

1-1 PURPOSE

This Reservoir Area Structure Plan ("Reservoir ASP") provides a comprehensive framework for future development within the plan area ensuring: the efficient use of land, adequate provision of infrastructure and public facilities, conservation of resources, economic development opportunities, protection of significant natural environments, and the development of healthy, safe and viable communities.

Policies have been developed to achieve the following objectives:

- Facilitation of orderly development,
- Protection of the irrigation and water supply functions of the reservoirs,
- Reduction of land use conflicts,
- Collaborative stakeholder input and intermunicipal cooperation,
- Compatibility with Provincial Policies and Regulations,
- Provision of a safe and efficient road network, and
- Protection of the natural environment and historical resources.

2-7 PLAN AREA CONTEXT AND CONSTRAINTS

Analysis of the current context of the Vulcan County Reservoir Area Structure Plan was undertaken to identify constraints that may impact future development. Primary constraints within the Plan area are described below. Policy within the ASP has been crafted to proactively address these constraints.

- **Reservoir Protection:** The water-supply function of the reservoirs could be threatened by development which could cause potential contamination risk or, with respect to shoreline development, exacerbate erosion issues.
- **Natural Resource Development:** There is a significant number of oil and gas wells and high-pressure lines, particularly in the Lake McGregor area. Required setbacks may limit development in these areas.
- **Significant Crown Owned Lands:** A clear understanding of how Crown lands may be divested, acquired and ultimately developed will require communication and cooperation between the County, the Crown and developers.
- **Servicing Infrastructure:** The lack of water and sewer servicing in the communities limits the amount of growth and development that can occur in the area.
- **Adjacent Agricultural Uses:** Development has the potential to impact agricultural lands and the rural character they support.
- **Increased Usership of Reservoirs:** Increased usership has the potential to threaten the natural environment and negatively impact the existing rural character of the reservoir area, however access to the water needs to be maintained for all stakeholders including residential, agricultural, industrial and recreational users.

3-3 GUIDING PRINCIPLES

Agricultural Protection

High quality agricultural lands should be protected while still allowing for subdivision and development to occur. Future development should respect agricultural areas within and adjacent to the plan area by avoiding land use conflicts.

Reservoir Protection

The primary consideration for the reservoirs is their water-supply function. Negative impacts of development should be minimized, particularly in areas directly adjacent to reservoirs. Environmental strategies shall be prepared prior to development to demonstrate how negative impacts will be mitigated. Public reservoir access should be provided in a manner that is sensitive to the natural environment.

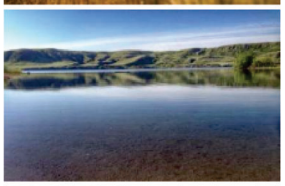
Environmental Stewardship

Environmentally sensitive areas should be protected from negative development impacts. Innovative approaches such as green infrastructure, water conservation and low impact development are encouraged to achieve environmental sustainability. Natural resources should be respected to avoid destruction or overuse.

High Quality Design

Development should respect and improve on the aesthetics and character of the rural landscape. Design and aesthetic standards should be developed to provide a consistent level of quality throughout the area.









7-1 AGRICULTURE

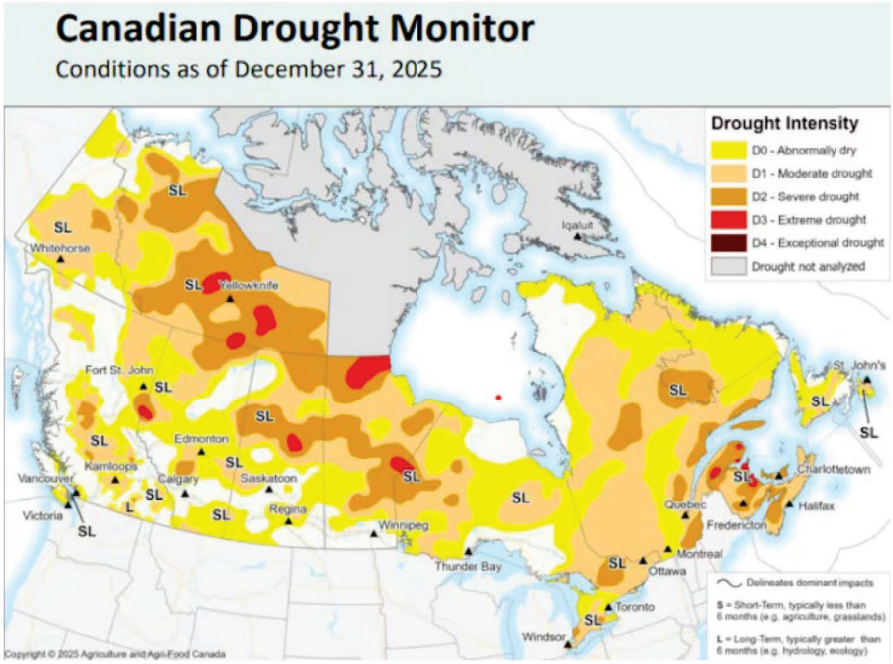
The reservoirs were constructed to provide irrigation water for agriculture, and although the use of the reservoirs also includes recreational activities, recreational development should not compromise water supply function.

Policy 7.1.1	Redesignation and subdivision for new or expanded agricultural uses that preserve the integrity of riparian areas and reservoir water quality may be considered.
Policy 7.1.2	New agricultural uses and development should not negatively impact adjacent development.
Policy 7.1.3	The introduction of confined feeding operations shall not be permitted.

8-3 RESERVOIR PROTECTION

Reservoirs have unique operational and maintenance characteristics that differentiate them from natural lakes. Unlike lakes, reservoirs may have extreme water level fluctuations and therefore the potential for erosion and instability. Alberta Environment and the BRID typically plan for annual over land runoff and adjust discharge rates to prevent downstream flooding on the Little Bow and Bow River. The prime function of reservoirs is to supply water for irrigation purposes. Development on lands adjacent to the reservoirs should not impact the water supply function of the reservoirs.

Policy 8.3.1	Future development should not negatively impact the water supply function of the reservoirs.
Policy 8.3.2	Development on lands adjacent the reservoirs shall not impact the operation or maintenance of the reservoirs.
Policy 8.3.3	Ongoing opportunities for public education programs designed to promote an understanding and awareness of the important water supply function of the reservoirs should be encouraged.
Policy 8.3.4	An erosion control strategy shall be prepared as part of all Conceptual Scheme applications.



Despite significant rainfall, much of Western Canada had abnormally dry or moderate drought conditions, as seen in this map from Dec. 31, 2025. (Agriculture and Agri-Food Canada)

What happens in drought years? Do the farmers get the water for irrigation, or does the Data Center take priority?

Is the water supply and irrigation as well as the significant natural environment still being protected as per the spirit of the Area Structure Plan (ASP)?

Warming temperatures are shrinking snowpack in key Canadian watersheds, study suggests
This year's record low snowpack in the west is a preview of things to come - Inayat Singh · CBC News · Posted: Feb 07, 2026 2:00 AM MST | Last Updated: February 9

https://www.cbc.ca/news/science/winter-snow-climate-water-9.7078119#:~:text=The%20watersheds%20most%20affected%20by,risk%20in%20parts%20of%20B.C.

CTV Article Published March 30, 2026

Scientists have found an alarming environmental impact of vast data centres

By CNN

Updated: March 30, 2026 at 2:59PM EDT

Published: March 30, 2026 at 2:58PM EDT



Cooling vent fans on the roof of a Digital Realty data centre in Ashburn, Virginia on Nov. 12, 2025. (Andrew Caballero-Reynolds/AFP/Getty Images via CNN Newsource)

They found surface temperatures increased by an average of 3.6 degrees Fahrenheit after a data centre started operations. In extreme cases, nearby temperatures reached up to 16.4 degrees Fahrenheit.

These increases were consistent across the globe, the researchers found. In Mexico's Bajio region, for example, which has become a data centre hub, the study found unexplained temperature rises of around 3.6 degrees over the last 20 years. A similar situation was seen in Aragon, Spain, a European centre for hyperscale AI data centres, which recorded a temperature increase of 3.6 degrees which was not replicated in neighboring provinces.

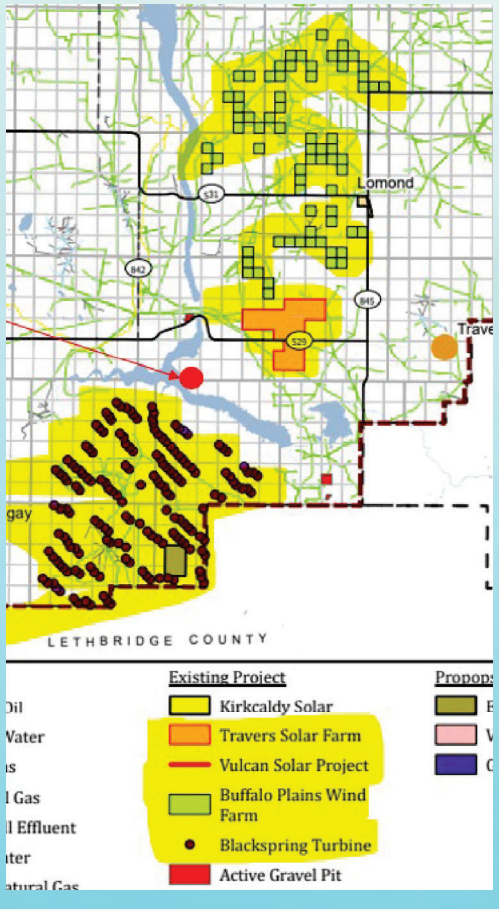
Strikingly, the impacts weren't limited to a data centre's immediate surroundings; temperature increases affected areas up to 6.2 miles away, the research found, affecting more than 340 million people.

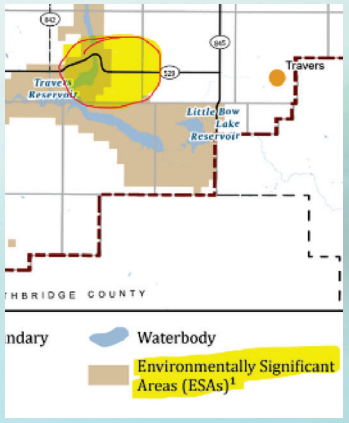
https://www.ctvnews.ca/climate-and-environment/article/scientists-have-found-an-alarming-environmental-impact-of-vast-data-centres/

IN SUMMARY

CUMULATIVE EFFECTS

- We as residents are concerned about industrial development in close proximity to the Travers Reservoir, a designated Recreation & Tourist area, and the resulting impacts on wildlife and habitat fragmentation. The proposed change from agricultural to industrial use fails to address the <u>cumulative impacts</u> on water, noise, light pollution, air quality, and infrastructure as this corridor becomes increasingly industrialized.
- <u>As such, the application is premature and inconsistent with responsible land use planning and should be denied.</u>

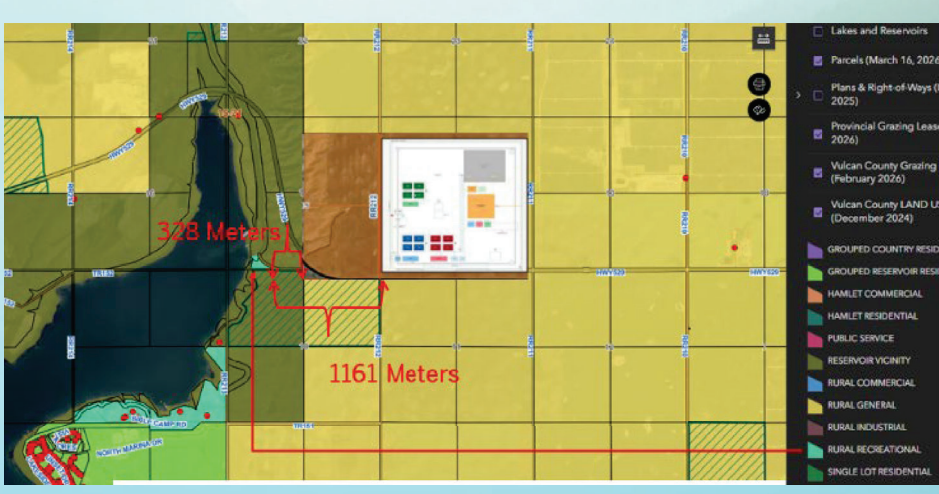






IN SUMMARY →INDUSTRIAL DEVELOPMENT NOT APPROVED HERE

- Has the County considered that if this land use is changed to Rural Industrial for a Data Processing Facility, the Vulcan County Land Use Bylaw No. 2020-028 specifically states that the location of such site should not be approved within 1.6km of a recreation area when there is one existing less than 0.35km away?
- This land is also less than 0.35km away from Environmentally Significant Areas and Recreation & Tourism Point of Interest as stated in the Municipal Development Plan.
- <u>For these reasons, we urge the County to decline this application for redesignation</u>



SECTION 13 INDUSTRIAL SITING STANDARDS

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(d) an environmentally significant area;

(e) an existing or approved rural residence.

Proposed Land Use Change – Rural Industrial

As per Vulcan County Land use Bylaw 2025-027 (July 2025)

RURAL INDUSTRIAL – RI

PURPOSE: *To allow industrial uses to be located in rural areas provided they do not pose a threat to the environment or create a potential nuisance for residents.*

SECTION 1 USES

1.1 **Permitted Uses**

Accessory building, structure or use
Additions to existing buildings
Contractor, limited
Industrial, light
Office
Shipping container *(e)*
Sign, Category 1 *(e)*
Soft shelled building *(e)*
Utilities *(e)*
Warehousing and storage, general

1.2 **Discretionary Uses – MPC**

Abattoir
Agricultural processing
Agricultural repair shop
Airport
Airstrip
Anhydrous ammonia storage/facility
Animal care service, large
Auction market
Auto recycling and salvage yard
Auto repair and paint shop
Auto sales and service
Bulk fertilizer storage and sales
Bulk fuel storage and sales
Business support service
Cannabis production facility
Cardlock fuel dispensing facility
Commercial truck wash
Compost facility type 1 and type 2
Contractor, general
Crop spraying operation and facility
Data Processing Operation
Farm/industrial machinery sales, rental and service
Feed mills/Grain terminals
Fleet and transportation services 1 and 2
Freight terminal
Hangar
Industrial, heavy

Discretionary Uses – DO

Sign, Category 2 and 3

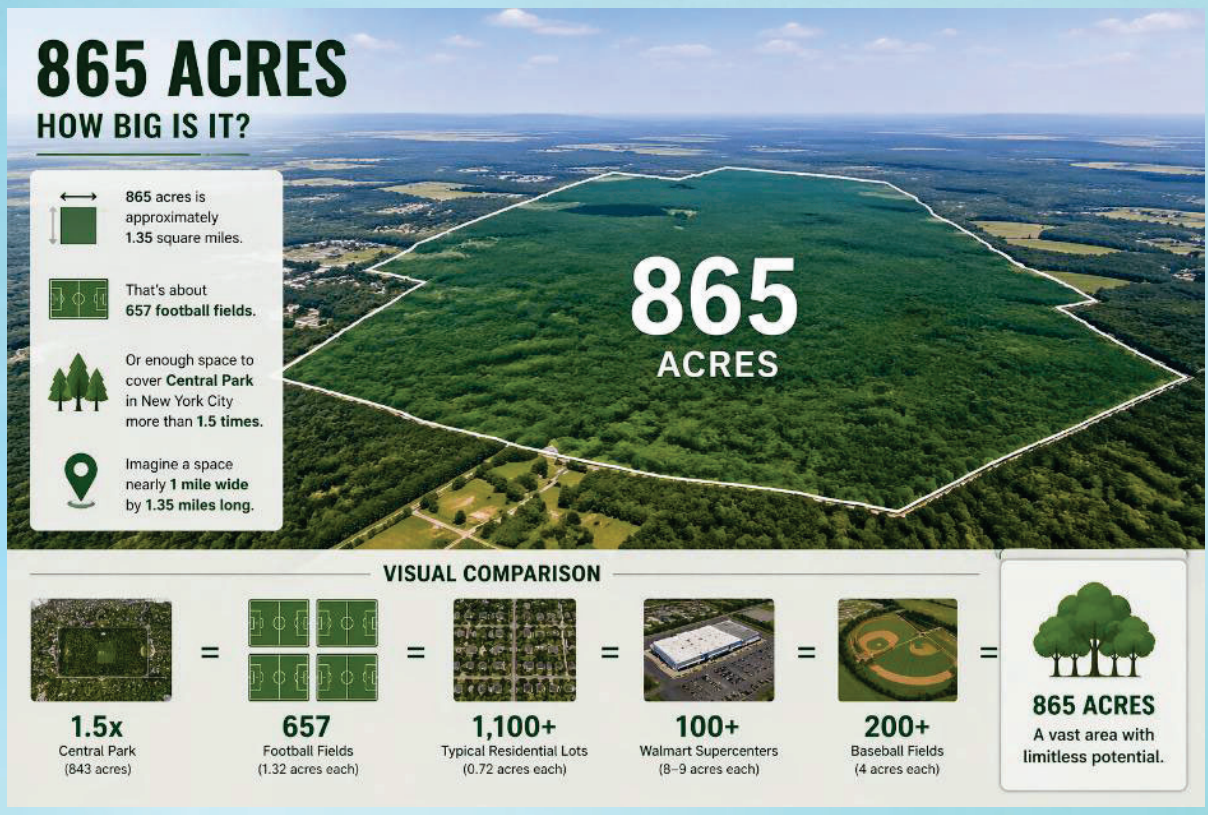
Discretionary Uses – MPC (continued)

Livestock truck and trailer wash
Lumber yard/building supply store
Manufactured dwelling sales and service
Manufacturing and fabrication operation
Mini-storage facility
Moved-in building
Natural resource extraction and processing
Oilfield contractor services
Oilfield/pipe equipment and storage
Outdoor storage
Pre-fabricated building manufacturer
Recycling facility
Renewable energy, commercial/industrial
Renewable energy, individual
Residential use in conjunction with an approved industrial use
Retail
Sandblasting facility
Seed cleaning plant
Security suite
Truck transportation dispatch/depot
Warehousing and storage, industrial
Waste management site
Welding shop
Work camp, long term
Work camp, short term
Work/lay down camp

(e) means "Exempt" and development will not require a development permit if it meets all the provisions of this Bylaw and is in accordance with any applicable requirements in Schedule 3.

What else could end up here and also cause issues with the Environmentally Sensitive Areas if rezoned?

Footprint and Image Perspective



Footprint and Image Perspective



- Potential rendering of a 2GW AI Data Center on 865 Acres with a power plant. This is what you would likely see travelling East on Hwy 529 from Champion just prior to going down the hill to drive over the spillway prior to entering the resort via the gravel road

As a property owner in the Vulcan County, I request transparency.

Transparency means public hearings with real, complete information about the application's energy consumption, water use, noise levels, and cumulative effects on the environment, as well as the local infrastructure and residents.

I ask that elected officials answer to their constituents first, rather than to the corporations (Palliser Grid – Eric Steeves) seeking these zoning variances

THANK-YOU...



From: Jack Redekop
To: Alena Matlock
Cc: Tim Stewart
Subject: Presentation for Public Hearing on AI Data Centre June 10, Chapion, Bylaw 2026-007
Date: June 3, 2026 9:51:15 AM
Attachments: Vulcan County June 10 Champion Hearing.docx

[redacted]

Attached and following is my specific request to present at the hearing in Champion this presentation.

Of particular interest is an approximately one minute facebook video link with an actual view of the light created and the sound generated by an AI Data Centre with specific instructions of what point of the video to scroll to and stop.
Please let me know if you are able to accommodate this in the hearing to view and listen for all those attending.
For you information, the entire video is dedicated to concerns around AI Data Centres proposed for Alberta - but, as stated, I wish only to present the minute indicated in my presentation.

Thank you so much for allowing us to present and engaging with your constituents.

Sincerely, Jack Redekop, [redacted] Lakeside Drive, Little Bow Resort

To: Councilors of Vulcan County

Re: Public Hearing for Bylaw 2026-007

Thank you for the opportunity to present at the June 10 Public Hearing for this attempted land redesignation.

Let me state at the outset that we are not opposed to progress and the development of AI Data Centres; but without a clear understanding of their impact and strict regulation to minimize their effect on the environment, the Bow basin water supply, and the farmers and residents surrounding them, we could be facing a potential ecological disaster.

"The rapid, often unregulated expansion…of AI Data Centres… has created urgent risks around energy consumption, water scarcity, and local community health." **Source: London School of Economics.**

It has been documented that the noise and light of an AI Data Centre, within three kilometers, sounds like the continuous landing of a Boeing 747 and looks like day in the middle of the night. To hear the actual noise generated, and "see the light" simply click the link and advance to 1 minute 16 seconds: https://www.facebook.com/search/top?q=elaina%20tuttle%20ai



AQMfJ7ikaBhbu4IEJ
yeWB_210BR9hJIP4V

Please play to 2 minutes and 14 seconds.

The last part of this video refers to the millions of gallons of water AI Data Centres use. It has now been proven that even closed loop systems still use millions of gallons of water, daily, as most of the water in the system evaporates into the air when they are separating the sludge (forever chemicals) after circulating through the system.

Water that is needed most for irrigation by the surrounding farms and residents, particularly in times of drought.

And yes, the disposal of these toxic "forever chemicals" creates another significant waste management concern.

It has been proven that electricity costs actually escalate for residents located near an AI data Centre. Since AESO base their levies on a grid system, they charge more to those areas that use more and all residents within that grid.

There have been many promises made to surrounding farmers, Lomond and Champion, and the Southern Alberta Bible Camp. Past behavior is often cited as the best indicator in the fulfillment of future promises.

So who benefits from the presence of an AI Data Centre? Yes, there is more tax revenue for the county but, did local residents see their taxes go down, or their power costs reduced as a result of the wind and solar farms on the Palliser Grid property. Both went up and continue to do so.

AI Data Centres employ as little as 20 specialized technicians -so it is minimal or no benefit to Lomond, Champion or Vulcan. Again, did we see any lasting employment benefit from the wind and solar farms?

The presence of an AI Data Centre in Vulcan County would benefit one family and one trillion-dollar company headquartered thousands of miles away, probably in another country.

Thank you for allowing us to present to you today.

Corollary and Appendix Reference

There were a number of representations made by Palliser Grid which, under closer examination, were simply false;

1) They indicated that the closest residence was a mile and a half away. The Southern Alberta Bible camp, with over 1700 campers and 298 part-time and full-time staff are well within, as the crow flies, that mile and half. The 280 full and part-time residents of Little Bow Resort (over 50 full-time), are directly adjacent to the bible camp.
   (We had the opportunity, after the previous April 9 hearing, to discuss the AI Data Centre with the proponent and his parents. They indicated they would be willing to move it further East next to their farm. Even though that would be better – north and east of their farm would be

significantly better. They may want to listen and see the previous video references before making such an offer.)

2) They suggested that drought had made the land unproductive and that the existing solar and wind farms had improved its productivity. That claim is questionable, as neighbouring farms have continued to operate successfully. More importantly, it is unclear who has benefited from that increased productivity, since there are no "crops" anymore. In addition, wind and solar power have also proven to be unreliable when residents need the power most.

3) They implied that there would be significant benefit to the towns of Lomond and Champion. In fact, after construction, AI data centres require as few as 20 specialized employees to operate.

4) They implied there would be benefits to neighbouring residents through reduced utility costs. We now know, electricity rates for neighbouring residents of existing AI Data Centres, have substantially increased.

5) The representative of the Irrigation District suggested that there would be insignificant and tolerable drain on the water resources. Evidence from existing AI data centres, even with a closed loop system, has shown that their water consumption has been grossly underestimated. Furthermore, the representative failed to factor in some of the severe droughts we have had in recent years. These are times when our farmers need the water for irrigation the most.

Therefore, this is a request to completely ***REJECT*** **the Land Use Redesignation proposal of Palliser Grid.**

Palliser Grid can of course re-apply, but such application should be conditional upon:

1) Vulcan County Council providing the Applicant's submission far enough in advance of a hearing so that the public has sufficient time to study it, in preparation of their responses;

2) Vulcan County Council ensured, prior to presentation, that the proposal meets all the provincial and county land setbacks requirements;
3) Vulcan County Council ensures the proposal is complete, including but not limited to pumping stations, on-site generation facilities (je. gas plants), etc.
4) Vulcan County Council ensures that all the regulatory approvals will be required, including the Alberta Utilities Council, Alberta Provincial Parks and Recreation, etc.

New research is now issued almost daily regarding the risks and benefits of AI data centres.

Most of this research indicates that the power consumption, water requirements, noise, light, water and air pollution far exceed original projections.

(1) Does AI Really Use That Much Water?



AI data centers are causing concerning levels of water depletion in certain areas — including the Great Lakes, according to **Futurism**, a news site focused on science and tech.

"Data centers use lots of water to absorb the heat generated by computation," Weinstein said. "What this often means is that a large volume of freshwater from the surrounding environment is diverted to the data center and away from other uses, like drinking water."

AI data centers are increasing water scarcity, **Bloomberg** reports, and more than half of the data centers developed since 2022 are in areas where demand for water already exceeds available supply. Because coal and gas plants also require large amounts of freshwater for cooling, Weinstein said the electricity used by each data center contributes to even more water depletion.

(Detail of this research can be found at: Southern New Hampshire University: https://www.snhu.edu/about-us/newsroom/stem/ai-environmental-impact)

(2) Scientists have found an alarming environmental impact of vast data centers

Story by Laura Paddison, CNN

The vast data centers that power artificial intelligence guzzle huge amounts of energy but they also have another alarming impact, according to new research. They are creating "heat islands," warming the land around them by up to 16 degrees Fahrenheit, and making life hotter for more than 340 million people.

(Details of this research can be found at: https://www.msn.com/en-us/weather/topstories/scientists-have-found-an-alarming-environmental-impact-of-vast-data-centers/ar-AA1ZL7P1)

(3) U.S. electricity grid stretches thin as data centers rush to turn on onsite generators — Meta, xAI, and other tech giants race to solve AI's insatiable power appetite

Jowi Morales published January 5, 2026

AI companies are turning to gas turbines to run their data centers without grid power.

(Details of this research can be found at: https://www.tomshardware.com/tech-industry/artificial-intelligence/u-s-electricity-grid-stretches-thin-as-data-centers-rush-to-turn-on-onsite-generators-meta-xai-and-other-tech-giants-race-to-solve-ais-insatiable-power-appetite

Other Sources of Research Information

1) The London School of Economics and Political Science
2) World Resources Institutes
3) The University of Alabama – Birmingham
4) ScienceDirect.com
5) Wikipedia – Environmental Impact of Artificial Intelligence
   tps://www.tomshardware.com/tech-industry/investors-push-amazon-microsoft-and-google-to-disclose-data-center-water-and-power-consumption

From: smpurdon
To: Alena Matlock
Cc: [redacted]
Subject: Presentation for June 10th Bylaw 2026-007 Public Hearing
Date: June 3, 2026 11:19:10 AM
Attachments: June 10th 2026 Public Hearing - LBR AI Data Center Committee Power Plant Siting.pdf

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Hello,

Please find the attached presentation for the June 10th, 2026 meeting in Champion. I would like to present during the meeting.

Should you require anything else, please reach out.

Thanks,

Steven Purdon
[redacted] Sunset Drive, Vulcan County

Sent from my Galaxy

AI Data Center Committee
Power Generation Scale and Siting
June 10th, 2026 Public Hearing

Little Bow Resort



AI Visualization of a 35 ft tall Data Center and Natural Gas Power Generating Facility

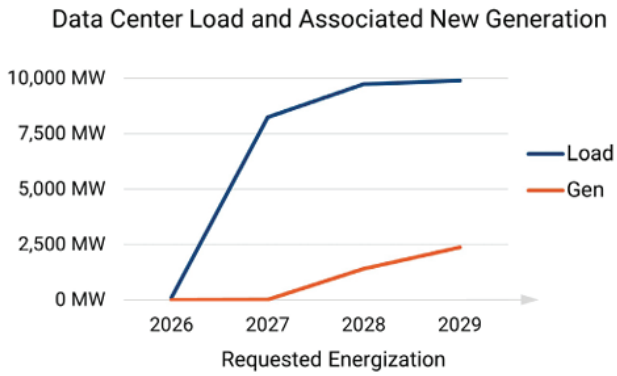
Steven Purdon, Little Bow Resort Resident. Impacted by proximity related to Industrial Siting Selection

Power Requirement

Little Bow Resort

Due to the high demand for power for AI datacenters in Alberta the AESO has effectively “capped” the connection availability to 1200MW until 2028 and have already selected the 2 projects that will use this allotment. Projects outside of this will be required to BYOP. (Bring Your Own Power)

This will require that the project proposed for Vulcan County will need to generate a good portion of its own electricity which will require a significant power generating facility be installed for the build out of the complex. Once the location is selected it will need to meet the future 2000MW requirements.



Source: AESO Data Centre Update

Scale of Power Required

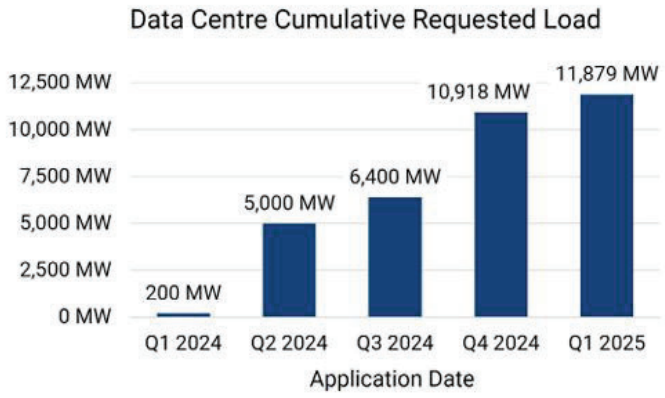
Little Bow Resort

The proposed facility has proposed the first phase requiring 500MW with an ultimate build out to 2000MW (2GW)

For Context:

City of Edmonton approximate load: 1400MW

City of Calgary: 1824MW highest peak load (July 23, 2024)



Sources:

AESO Data Centre Update

Corporate Energy Consumption | Open Calgary

AESO Announces Interim Approach to Large Load Connections » AESO

Scale of Power Required

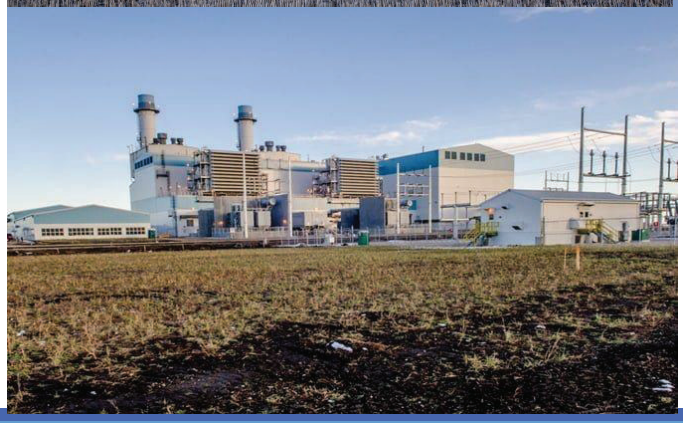
Little Bow Resort

Some Examples of Current Power Generating Facilities in Alberta:

Shepard: 869MW

Combined Cycle Natural Gas Turbines and Steam Turbine





Sources:

ets.aeso.ca/ets_web/ip/Market/Reports/CSDReportServlet

The Shepard Energy Centre | Electricity Canada

Scale of Power Required

Little Bow Resort

Some Examples of Current Power Generating Facilities in Alberta:

Around the 500MW Range:

Genesse Repower 1: 466MW

Genesse Repower 2: 466MW

Natural Gas Turbines with Heat Recovery and Steam Turbines



Source:

https://www.majorprojects.alberta.ca/details/Genesee-Power-Plant-Natural-Gas-Conversion/4403

Scale of Power Required

Little Bow Resort

Some Examples of Current Power Generating Facilities in Alberta:

Solar:

Travers: 465MW*

Wind:

Buffalo Plains Wind Farm: 495MW*

*Ultimate capacity in ideal conditions, not continuous and obviously not at night related to solar



Source: https://majorprojects.alberta.ca/details/Travers-Solar-Project/3656

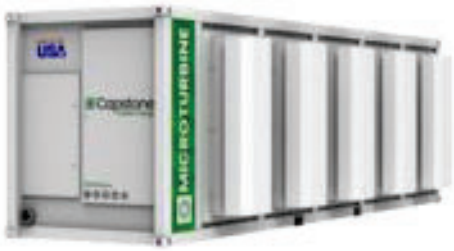
Power Options - Continuous

Little Bow Resort

Large natural gas turbines, generally with heat recovery systems and steam turbine.



Smaller turbines (only 1MW each) –likely requiring 100s of units



Expandable
Can be paralleled up to 30MW of power

Sources:
[Genesee Energy Centre: the heart of Alberta's decarbonized future | Electricity Canada]

[Products :: Capstone Power Solutions]

Emergency Power Scale

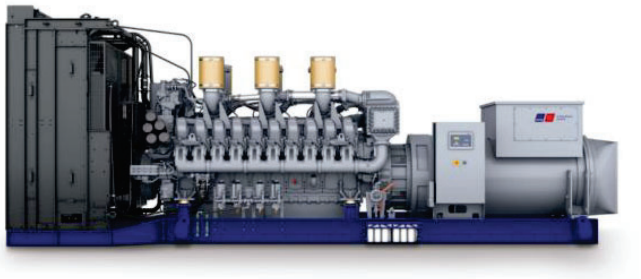
Little Bow Resort

Application lists full facility load required with 99.99999% uptime.

Diesel Gensets: 1-4MW (each)

Context: Engines used for Trains

Large seacan size x 124 units (at least)



5 Million Litres of Diesel (listed on application)

Tank shown from Avenell project, note circled area that shows a worker located by the valve for scale of size.



Sources:

Diesel Generator Sets

Project: Avenell – 5 Million Litre Diesel Tank - Sun Engineering

New Info In Context

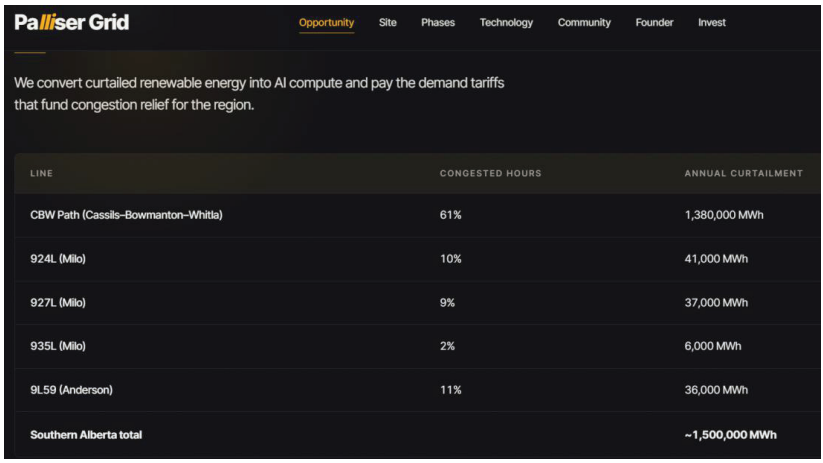
Little Bow Resort

1,500,000 MWh annual curtailment is equivalent to 171MW assuming that the generating and batteries were being filled in an optimal manner and dependent on weather conditions year to year.

Power Plant true size should be clear prior to siting being completed, website notes a potential range of 100MW (substantial) on Phase 1 alone which then has the remaining project phases bolted on top. The remaining phases are potentially not local renewable resources given the current position of the Alberta government on renewables on agricultural land.

Other power from renewables in the area already in use by province and therefore shortfall will need to be generated within the project.

Hydrogen fuel cells, storage and potential compression added to project scope



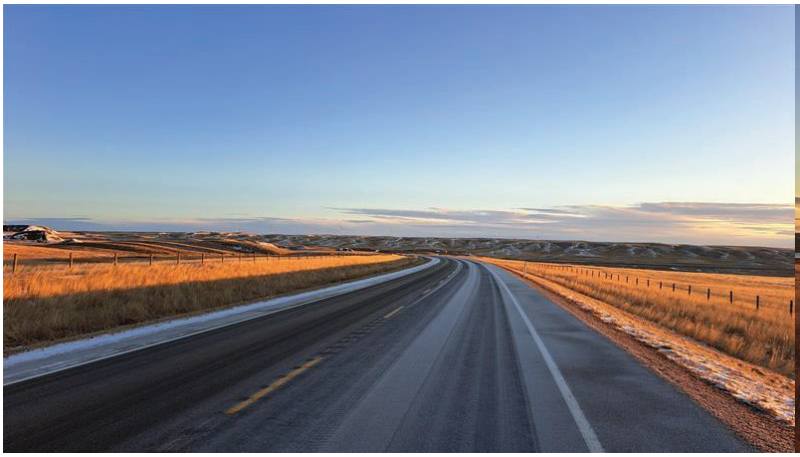
Source: Palliser Grid Website

Inappropriately Sited

Little Bow Resort

Consideration required that this is an industrial power plant and not merely warehouses that contain servers, cooling systems and pumps. Is there a more appropriate location within the county for this and has enough pre-work been done to know for certain that this is the optimal location?

The original designation related to datacenters and even bitcoin mining did not contemplate the level of power usage that an AI datacenter presents.





From:	Rob & Diane Delanoy
To:	Alena Matlock; Jason Schneider; Doug Logan; Jodie Gateman; Alex Horkoff; Laurie Lyckman; Kelly Nelson; Christopher Northcott; Nels Petersen; Lansey Middleton
Subject:	Bylaw 2026-007 - Re-Designation of land from RG to RI
Date:	June 2, 2026 1:13:32 PM
Attachments:	Vulcan County - Bylaw 2026-007 - Letter Opposing Re-Designation to Rural Industrial - R & D Delanoy - May 31, 2026.pdf

[redacted]

To the Vulcan County Council:

We are writing this to record our opposition to the proposed re-designation of approx 850 acres, near Little Bow Resort, from Rural General to Rural Industrial.

We believe this re-designation should not be allowed to proceed and that such a re-designation is not in the best interests of Vulcan County, as a whole.

We attach a letter with further information.

We ask that this email and the letter be included in the public record for the upcoming public hearing on this matter.

Please acknowledge receipt.

Robert & Diana Delanoy
[redacted] Sunset Dr
Little Bow Resort

May 31, 2026

To: Council of Vulcan County

Subject: **Letter of Objection – Proposed Palliser Grid AI Data Centre Campus Bylaw 2026-007 Re-designation of land from Rural General (RG) to Rural Industrial (RI)**

Dear Members of Council:

We are writing to you to oppose the proposed land use re-designation from rural general to rural industrial for the proposed AI Data Centre Campus – Bylaw 2026-007

Our reasons for opposing this re-designation are as follows:

1) The area that is proposed to be re-designated is too close to an environmentally sensitive area, being the canal feeding Travers Reservoir and the Reservoir itself. Any industrial use in the subject area and especially the proposed AI Data Centre, risks, in our view, certain pollution of the Reservoir and of our drinking and potable water at Little Bow Resort and the Southern Alberta Bible Camp. If this area is rezoned, you will be putting us in "harms way".

   Many industrial users, and we expect this project will be not unlike any other, usually expect that the "solution to pollution is dilution", that is the cheapest method of disposal of left over chemicals and residues from the water cooling system and any other operations will be to dump it into the reservoir. Lots of acre feet of water there, no one should notice. If people do notice, who will **prove** it was "them" that did it. Certainly, the County will not have the responsibility nor the resources to be "watching" for this nor will it have the authority and expertise to pursue them. Currently, we don't believe we could count on the Province of Alberta to be watching, either.

   It is doubtful that a re-designation of this magnitude would be considered this close in proximity to, say Lomond or Champion or Vulcan and their water supply. We wonder then, what makes it "OK" to contemplate a re-designation of this magnitude in such close proximity to Little Bow Resort and our water supply? **We oppose this re-designation.**

2) The re-designation of this area, so close to Little Bow Resort, will interfere with our right to the peaceful use and enjoyment of our property. Peaceful use and enjoyment precludes the noise pollution, the light pollution, the water pollution and the potential hazards that any fire at the AI Data Centre facilities will most certainly bring upon us.

There are not many recreational areas in Southern Alberta. Allowing this re-designation will diminish, if not destroy, the recreational value of Little Bow Resort.

This re-designation, if approved, will be a **betrayal of trust** between us (and all other landowners in Little Bow Resort) and the County. We purchased our property, as did 252 other landowners at Little Bow Resort, on the basis that the policies in place at the time and subsequently reinforced, allowed for recreational use that would not be infringed upon by an industrial use. The two uses are incompatible in such close proximity and the County's own policies stated that. **We oppose this re-designation.**

3) The location of this AI Data Centre Campus, which will require massive amounts of water and power in an area of Alberta which is hot, dry and with limited water resources is unwise, in our view. The size of this AI Data Centre appears to be very large compared to most in service or contemplated in many cities in the USA. Yet in many of those cases, with AI Data centres which are 1/3 the size, water use and power use have drawn fierce opposition. How much more water is needed for humidity and cooling in an area that is dry and hot? We expect the water needed for this project will be much higher than what is estimated.

   AI Data Centre servers draw exponentially more power than standard cloud servers. As such, the area that seeks re-designation will become a "heat island", with heat being thrown off from the cooling exhaust from the cooling units and power generation units. In an already "hot" area, more heat will be added. Does that sound like a smart thing to do? **We oppose this re-designation.**

4) When considering an industrial re-designation of this size and scope, Council must consider the impacts and the benefits. Any such project should be a "win – win". A "win" for the proponent and a "win" for the County, for its residents and its landowners. We believe this re-designation and this AI Data Centre project is a "win-lose". **We oppose this re-designation.**

We request that this correspondence be included in the official record for Bylaw 2026-007.

Thank you for your attention regarding this matter.

Robert and Diana Delanoy
[redacted] Sunset Drive
Little Bow Resort

From: Jasona Rondeau
To: Alena Matlock
Subject: Vulcan County Land Use Redesignation hearing June 10th
Date: June 3, 2026 11:57:41 AM
Attachments: final draft vulcan county bylaw palliser grid.pdf

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[redacted]

Dear Administrator,
Please accept the attached document as my written submission for this hearing. I would also like to request a speaking spot for the hearing on June 10th. Please confirm receipt of this message.
Thank you,
Jasona Rondeau
[redacted]

Written Submission: Vulcan County Bylaw 2026-007 (Land Use Redesignation RG to RI)

Submitted by: Jasona Rondeau, B.Ed.

Date: June 3, 2026

1. Purpose and Main Concern

This submission relates to Bylaw No. 2026-007, which proposes to amend Vulcan County Land Use Bylaw No. 2020-028 by redesignating approximately 865 acres of land from the Rural General (RG) District to the Rural Industrial (RI) District.

The purpose of this submission is not to evaluate the merits of a future development permit application or determine whether a future data centre project should ultimately proceed. Rather, the issue currently before Council is whether the proposed land use redesignation is appropriate and whether sufficient information has been provided to support such a significant change in land use.

In reviewing the application materials, I found that many of the key considerations associated with the proposal remain subject to future study, future approvals, or future confirmation. These include matters relating to:

- water supply,
- wastewater management,
- electrical servicing,
- transmission infrastructure,
- environmental constraints,
- emergency response planning, and
- compatibility with surrounding land uses.

My comments are therefore focused on whether the application provides Council with sufficient information to make an informed redesignation decision, having regard for the Vulcan County Municipal Development Plan (Bylaw No. 2025-011), the Vulcan County Land Use Bylaw (Bylaw No. 2020-028), and the planning context established by the adjacent Reservoir Area Structure Plan.

2. Planning Framework Applicable to the Redesignation

2.1 Municipal Development Plan

The primary planning document applicable to the proposed redesignation is the Vulcan County Municipal Development Plan (Bylaw No. 2025-011) ("MDP").

- The MDP establishes the County's overall planning vision and provides policy direction for future development, land use bylaw amendments, subdivision applications, and development proposals.
- It also identifies the factors that should be considered when evaluating new development, including compatibility with surrounding land uses, impacts on agricultural operations, environmental considerations, transportation infrastructure, water supply, and emergency response planning.

Of particular relevance to this application, the MDP states that proposals for future development, including land use bylaw amendments, are required to provide the information necessary for the approving authority to make an informed decision. The MDP also recognizes the importance of balancing new development with existing land uses and ensuring that adequate servicing and infrastructure are available to support future development.

2.2 Land Use Bylaw

The proposed redesignation would be implemented through an amendment to Vulcan County Land Use Bylaw No. 2020-028 ("LUB").

- The LUB establishes the process and information requirements for redesignation applications and provides Council with the authority to evaluate whether a proposed amendment is appropriate.
- The LUB also allows Council to request additional information where necessary and requires Council to consider the Municipal Development Plan and any other applicable statutory plans when making a redesignation decision.

2.3 Adjacent Reservoir Area Structure Plan

Although the subject lands are not located within the Reservoir Area Structure Plan ("ASP") boundary, the ASP remains relevant planning context for this application.

- The subject lands are immediately adjacent to the ASP area and the proposed development is expected to rely upon water sourced from Travers Reservoir.
- The ASP identifies long-term planning objectives relating to reservoir protection, environmental stewardship, servicing, transportation, recreation, tourism, and future residential development surrounding the reservoir system.

- These policies help illustrate the broader planning context within which the proposed redesignation would occur and may assist Council in evaluating issues relating to compatibility, water resources, and future development patterns in the area.

In addition, the ASP identifies future residential, recreational and tourism-oriented development in the area surrounding Travers Reservoir, which may be relevant when considering long-term land use compatibility.

3. The Application Provides Limited Planning Analysis

3.1 Limited MDP Analysis

As discussed above, the Municipal Development Plan is the primary planning document applicable to the proposed redesignation. However, after reviewing the application materials, I was unable to locate a detailed analysis of how the proposed amendment aligns with the policies and objectives of the MDP.

- The application provides extensive discussion regarding the proposed data centre campus, potential infrastructure requirements, servicing concepts, economic development opportunities, and future approvals.
- However, there appears to be limited discussion of the MDP itself and little evaluation of how the proposed redesignation supports the planning framework established by the County.

Given that Council is being asked to amend the Land Use Bylaw and redesignate approximately 865 acres of land, I would have expected to see a more direct assessment of the proposal against the applicable MDP policies.

3.2 Reliance on Future Information

A recurring theme throughout the application is the reliance upon future studies, future approvals, future technical work, and matters identified as "to be confirmed" or "TBC."

- Examples include water licensing, water balance analysis, wastewater management details, electrical servicing arrangements, transmission requirements, noise assessments, emergency response planning, and other technical considerations.

The existence of future approvals and studies does not necessarily mean the redesignation should be refused. However, the application repeatedly identifies

significant matters that remain unresolved and that will be addressed at a later stage.

This raises an important question: has sufficient information been provided for Council to make an informed redesignation decision at this time?

3.3 Scale and Intensity of the Proposal

The scale of the proposed redesignation is also relevant. The application seeks to redesignate approximately 865 acres from Rural General to Rural Industrial in order to accommodate a large-scale data centre campus and associated infrastructure.

- Unlike a small site-specific redesignation, this proposal would establish a new planning framework for a substantial area of land and could influence future development patterns, infrastructure requirements, servicing demands, and land use compatibility in the surrounding area.

Given the scale of the proposed redesignation and the long-term implications associated with it, it is reasonable to expect a high level of planning analysis and a clear understanding of the opportunities, constraints, and servicing requirements affecting the site before a redesignation decision is made.

4. Major Constraints and Outstanding Issues

The application identifies a number of significant matters that remain subject to future study, future approvals, future confirmation, or further technical analysis. Many of these issues relate directly to the factors that the Municipal Development Plan identifies as relevant to land use decision-making, including water supply, environmental considerations, servicing, transportation, compatibility with surrounding land uses, and emergency response planning.

The purpose of this section is not to suggest that these issues cannot ultimately be resolved. Rather, the question is whether sufficient information has been provided at this stage to support the proposed redesignation.

4.1 Water Supply and Water Licensing

- Water supply is one of the most significant issues associated with the proposed redesignation.
- The application identifies Travers Reservoir as the anticipated water source and acknowledges that a Bow River Irrigation District (BRID) licence amendment will be required. The application also identifies additional work

relating to water balance analysis, cooling water demand, wastewater generation, and other servicing requirements.

- An adequate water supply is a fundamental requirement for the proposed land use. Until water demand, licensing requirements, and long-term servicing needs are better understood, an important constraint affecting the suitability of the site remains unresolved.
- In addition to the Municipal Development Plan's emphasis on adequate water supply, the proposed reliance on Travers Reservoir also raises broader considerations relating to reservoir management and the planning context established for lands surrounding the reservoir.

4.2 Wastewater and Reservoir Protection

- The application identifies several wastewater-related matters that remain subject to future analysis and design, including wastewater treatment, blowdown management, residuals handling, and discharge contingencies.
- These issues are particularly relevant given the proposed reliance on reservoir water and the proximity of the site to the broader reservoir area.
- Wastewater generation and disposal are directly connected to questions of environmental protection, long-term servicing, and potential impacts on surrounding lands and water resources.
- At present, several of these matters remain unresolved.

4.3 Electrical Servicing and Transmission

- The proposed development would require substantial electrical infrastructure.
- The application identifies ongoing AESO processes, utility capacity verification requirements, AltaLink involvement, and future transmission-related approvals. The application also identifies utility interconnection as one of the key project risks requiring further resolution.
- Electrical servicing is a fundamental requirement of the proposed land use. Until the servicing and transmission requirements are more clearly understood, a significant development constraint remains outstanding.

4.4 Environmental Constraints

- The Municipal Development Plan identifies environmental considerations and natural features as important factors in land use decision-making.
- The subject lands are located near Travers Reservoir and the AB016 McGregor Lake–Travers Reservoir Important Bird Area (IBA). Despite the

presence of these environmental features, the application contains limited discussion regarding potential environmental constraints affecting the site.

- Given the scale of the proposed redesignation, a clearer understanding of environmental opportunities and constraints would assist Council in evaluating the suitability of the lands for Rural Industrial development.
- Major energy developments within the broader Travers Reservoir area have required extensive environmental review and mitigation planning, suggesting that environmental opportunities and constraints within this landscape may be more complex than is reflected in the current application materials.
- Please refer to Appendix B: Environmental Context within the Travers Reservoir Area for more detailed explanations of the IBA and environmental constraints previously identified for the Travers Solar Facility and the proposed Travers BESS Facility

4.5 Fire Protection and Emergency Response

- The application contemplates battery storage systems, diesel fuel storage, backup generation infrastructure, and other industrial facilities that may require specialized emergency response planning.
- At the same time, the application identifies emergency response planning and related safety measures as matters requiring further development.
- The Municipal Development Plan specifically recognizes the importance of addressing fire risk and emergency response considerations. In my view, these matters warrant further evaluation before a redesignation decision is made.

4.6 Transportation and Road Infrastructure

- The proposed redesignation has the potential to generate significant construction traffic and long-term industrial traffic.
- The Municipal Development Plan identifies impacts on local roads and the provincial highway network as relevant planning considerations. However, transportation impacts and infrastructure requirements remain subject to future analysis.
- A clearer understanding of transportation demands would assist Council in evaluating the long-term implications of the proposed redesignation.

4.7 Compatibility with Surrounding and Planned Land Uses

- Compatibility with surrounding land uses is a recurring theme throughout the Municipal Development Plan.

- The subject lands are surrounded by agricultural lands and are located immediately adjacent to the Reservoir Area Structure Plan boundary. While the subject lands are not governed by the ASP, the ASP identifies future residential, recreational, tourism, and reservoir-related development opportunities in the surrounding area.
- Given the scale of the proposed Rural Industrial redesignation, compatibility with both existing land uses and planned future development warrants careful consideration.

4.8 Noise and Land Use Compatibility

- The application identifies noise assessment as a future technical study and indicates that additional analysis will be required as project planning progresses.
- Given the scale of the proposed development, future operations may include data centre buildings, cooling systems, backup generation equipment, electrical infrastructure, and other industrial sources of noise. At present, however, detailed noise information does not appear to be available.
- Noise is an important component of land use compatibility. Without a completed noise assessment, it is difficult to evaluate potential impacts on surrounding land uses or determine whether mitigation measures may be required.
- The application also references future noise objectives and performance targets, including a nighttime sound level target of 45 dBA. However, in the absence of supporting analysis, it is difficult to assess the basis for this target, how it relates to existing noise requirements applicable to nearby industrial developments, or how cumulative noise effects from existing and proposed developments in the area would be considered.
- Given the proximity of agricultural operations, rural residences, the approved Travers Solar Project, the proposed Travers Battery Energy Storage System, and future development contemplated within the adjacent Reservoir Area Structure Plan area, additional information regarding noise and cumulative sound levels may assist Council in evaluating the long-term compatibility of the proposed redesignation.

4.8 Planning Analysis and Information Gaps

- Throughout the application, many important matters are identified as requiring future study, future approvals, future confirmation, or future technical analysis. Examples include water licensing, utility interconnection,

wastewater management, transmission requirements, emergency response planning, and noise assessment.

- Individually, these matters may be capable of resolution. Collectively, however, they raise a broader planning question regarding whether sufficient information is currently available to support a redesignation of this scale and intensity.
- Given the size of the proposed redesignation and the long-term implications associated with it, Council may wish to consider whether additional planning analysis is warranted before making a permanent land use decision.

5. Conclusion

The decision before Council is whether Bylaw No. 2026-007 should proceed and whether the proposed redesignation from Rural General to Rural Industrial is appropriate for the subject lands.

The Municipal Development Plan requires that sufficient information be provided to allow the approving authority to make an informed decision. The Land Use Bylaw similarly contemplates the submission of information necessary to understand the impacts, constraints, servicing requirements, and merits of a redesignation application.

After reviewing the application materials, I remain concerned that several significant matters have not yet been fully evaluated. These include water supply and licensing, wastewater management, electrical servicing, transmission infrastructure, environmental constraints, emergency response planning, transportation impacts, and compatibility with surrounding and planned land uses.

This submission is not intended to suggest that these issues cannot ultimately be resolved. Rather, my concern is that many of these matters remain subject to future study, future approvals, or future confirmation, despite the fact that Council is currently being asked to make a permanent land use decision affecting approximately 865 acres of land.

For these reasons, I respectfully submit that Council should carefully consider whether the information currently before it is sufficient to support the proposed redesignation at this time and whether additional planning analysis may be warranted before proceeding with Bylaw No. 2026-007.

I have included a list of Questions for Consideration by Council as Appendix A.

Thank you for your time and consideration,

Jasona Rondeau

Appendix A: Questions for Consideration by Council

The following questions arise from the application materials and may assist Council in determining whether sufficient information has been provided to support the proposed redesignation.

Planning and Policy

1. How does the proposed redesignation align with the objectives and policies of the Municipal Development Plan?
2. Has sufficient information been provided to demonstrate that the subject lands are suitable for the proposed Rural Industrial designation?
3. What opportunities and constraints affecting the site have been identified, and have they been adequately evaluated?

Water, Wastewater and Servicing

4. Has sufficient information been provided regarding long-term water supply, wastewater management, and overall servicing requirements for the proposed development?
5. What approvals, studies, or technical analyses relating to servicing remain outstanding?

Electrical Infrastructure

6. Has sufficient information been provided regarding electrical servicing, transmission requirements, and associated infrastructure needed to support the proposed development?

Environmental Considerations

7. Have environmental opportunities and constraints associated with the site been adequately identified and evaluated?
8. What environmental approvals, assessments, or mitigation measures may ultimately be required?

Emergency Response and Public Safety

9. Has sufficient information been provided regarding emergency response planning, fire protection, and public safety considerations associated with the proposed land use?

Transportation

10. Have transportation impacts and infrastructure requirements been adequately evaluated?

Land Use Compatibility

11. Has sufficient information been provided to assess compatibility with surrounding agricultural operations and other nearby land uses?
12. How might the proposed redesignation influence future development patterns in the surrounding area?
13. Have potential cumulative effects associated with existing and proposed industrial development in the area been adequately considered?

Overall Decision-Making

14. What significant matters identified in the application remain subject to future study, future approval, or future confirmation?
15. Given the information currently available, does Council have sufficient information to make an informed redesignation decision?

Appendix B: Environmental Context within the Travers Reservoir Area

B.1 AB016 McGregor Lake–Travers Reservoir Important Bird Area

The subject lands are located within the broader landscape associated with the AB016 McGregor Lake–Travers Reservoir Important Bird Area (IBA).

Important Bird Areas (IBAs) are internationally recognized sites identified by Birds Canada and BirdLife International as being important for bird populations and biodiversity. The AB016 designation recognizes the ecological significance of the McGregor Lake and Travers Reservoir system and the surrounding habitats used by migratory birds, waterfowl, and other wildlife species.

The presence of an IBA provides important environmental context for understanding the broader landscape within which the proposed redesignation is located. It helps illustrate why environmental opportunities and constraints are an important consideration when evaluating major land use decisions in the area.

A map showing the location of the proposed redesignation lands in relation to AB016 and Travers Reservoir follows.

B.2 Supporting Environmental Review Documents

The following documents are attached to provide examples of the environmental review and mitigation measures that have been undertaken for major energy developments within the broader Travers Reservoir area.

The purpose of including these documents is not to suggest that the proposed redesignation will necessarily result in the same environmental impacts, nor that the regulatory requirements applicable to Alberta Utilities Commission-approved energy facilities are identical to those applicable to a municipal land use redesignation.

Rather, the documents illustrate the breadth of environmental considerations that have arisen in the area and provide context for the concern that environmental opportunities and constraints associated with the proposed redesignation may not yet be fully understood.

Travers Solar Project – Alberta Environment and Protected Areas Wildlife Referral Report

The Alberta Environment and Protected Areas Wildlife Referral Report prepared for the Travers Solar Project is attached in its entirety.

The report demonstrates the extent to which wildlife, habitat, migratory birds, wetlands, environmental mitigation measures, monitoring programs, and regulatory review were considered during the provincial approval process.

While the report relates to a different project, it provides useful context regarding the types of environmental considerations that have arisen within the broader Travers Reservoir landscape.

Travers Battery Energy Storage System – Environmental Protection Plan

The first five pages of the Travers Battery Energy Storage System Environmental Protection Plan are attached.

These pages identify the environmental professionals responsible for preparing the document and provide an overview of the environmental topics considered during project planning, construction, operation, monitoring, and reclamation.

The table of contents illustrates the breadth of environmental issues addressed through the planning and approval process, including:

- environmental compliance and monitoring;
- wildlife protection;
- wetlands;
- surface water and hydrology;
- groundwater protection;
- soil management;
- erosion and sediment control;
- vegetation management;
- spill prevention and response;
- reclamation; and
- adaptive management.

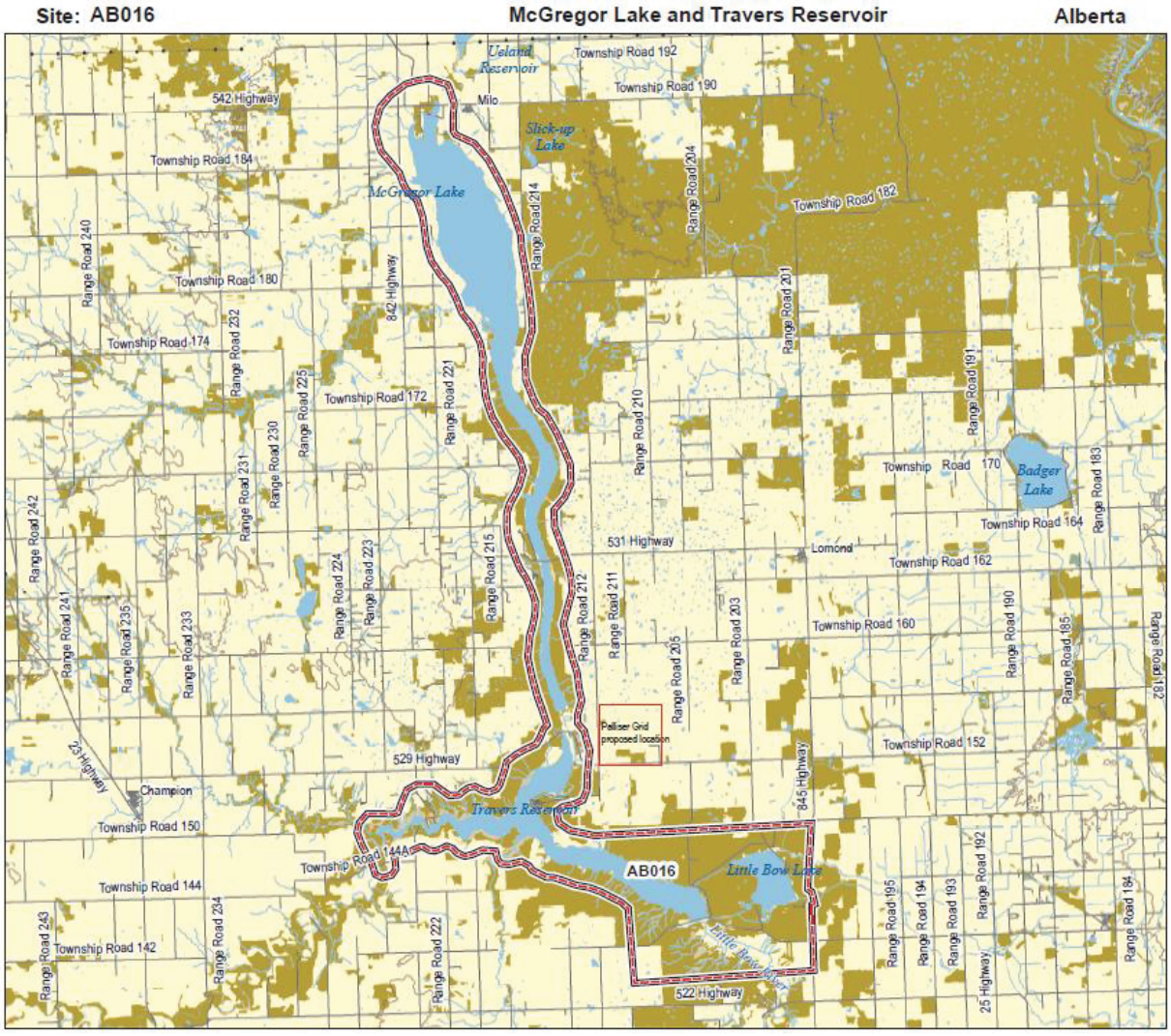
B.3 Relevance to the Proposed Redesignation

The materials included in this appendix are provided for context only.

The purpose is not to suggest that the proposed redesignation will necessarily result in the same environmental impacts as nearby renewable energy projects, nor that the same regulatory requirements would automatically apply.

Rather, these examples demonstrate that major developments within the broader Travers Reservoir landscape have required substantial environmental assessment, mitigation measures, monitoring programs, and regulatory oversight.

They illustrate that environmental opportunities and constraints within the area can be complex and support the importance of understanding those constraints before making a significant land use redesignation decision.



Alberta Environment and Parks

Wildlife Management
Operations Division
530 8th Street South, 2nd Floor
Lethbridge, Alberta T1J 2J8

March 18, 2019

Brenden Marchewka,
Greengate Power Corporation
Suite 350, 237-8 Ave. SE
Calgary, Alberta T2G 5C3
Brenden@greengatepower.com

Transmitted via email

Dear Mr. Marchewka,

RE: Renewable Energy Referral Report for the Travers Solar Project by Greengate Power Corporation

This letter is to advise that Alberta Environment and Parks - Wildlife Management (AEP-WM) Staff have completed the review of the project proposed by Greengate Power Corporation called Travers Solar Project. Attached is a copy of the AEP-WM Renewable Energy Referral Report, which reviews the potential impacts of the project on wildlife and wildlife habitat for inclusion with your application to other regulatory agencies. This review is only for the project as it has been presented by the proponent and any changes to the project (footprint, layout, mitigation measures, etc.), requires further review and written acknowledgement from AEP-WM to ensure wildlife and habitat are protected. If changes are made to the project siting, mitigation plans or other aspects of the project that increase the risk to wildlife, the risk ranking will be adjusted accordingly.

Sincerely,

K. Cline

Kristin Cline, M.Sc., P.Biol.
Wildlife Biologist, Renewable Energy Projects
Alberta Environment and Parks - Wildlife Management
Kristin.Cline@gov.ab.ca

cc:
Brandy Downey, AEP-WM, Brandy.Downey@gov.ab.ca
Delanie Player, Matrix Solutions Inc., dplayer@matrix-solutions.com

Alberta Environment and Parks – Wildlife Management Renewable Energy Referral Report

A. ALBERTA ENVIRONMENT AND PARKS – WILDLIFE MANAGEMENT (AEP-WM) REVIEW

The Travers Solar Project (the Project) proposed by Greengate Power Corporation (the Proponent) was reviewed by the Alberta Environment and Parks – Wildlife Management (AEP-WM) regional wildlife contact for renewable energy projects. AEP-WM has reviewed the proposed location, mitigation strategies, including associated infrastructure and construction plans, and post-construction monitoring and mitigation program, as presented by the Proponent in a submission dated December 14, 2018 and accepted by AEP-WM on January 2, 2019.

Documents reviewed by AEP-WM include:

- *Renewable Energy Project Submission – Travers Solar Project*; 101 pages; dated December 2018; hereafter referred to as *Travers Solar Project Renewable Referral Application*
- *AEP Initial Review Questions Travers Greengate Responses* (excel spreadsheet) and attached *Tables*; dated February 19, 2019; hereafter referred to as *Travers Solar Project Responses Spreadsheet*

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

The AEP-WM review of the Travers Solar Project was guided by the AEP-WM policy document, *Wildlife Directive for Alberta Solar Projects* (October 2017; hereafter called the *Directive*). The Proponent must follow the *Directive* for requirements on siting, pre-construction surveys, construction, operation, and post-construction monitoring and mitigation plans.

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

Summary: This summary is a condensed version of the entire referral report. For details on specific topics, see the body of this report. The overall project risk ranking is provided in the last paragraph of this summary.

The Travers Solar Project is sited entirely on cultivated land and avoids named lakes, permanent watercourses and valley breaks, which aligns with the *Directive*. The Proponent has implemented the required setback for 39 wetlands and provided adequate alternative mitigation for the setback infringement of one wetland. Therefore, the Project poses a low risk to wildlife habitat.

AEP-WM has determined the risk of wildlife entrapment due to the Project fence is low, based on the commitments made by the Proponent, however, if adequate mitigations are not implemented there will be an elevated risk of wildlife entrapment and mortality. The risk to migratory birds may be increased due to the proximity of Travers Reservoir, an important staging area for migratory waterbirds. However, the Proponent has sited the Project per AEP-WM policy and committed to monitoring and mitigating any impacts to wildlife. The risk to breeding bird mortality is low based on avian use in the Project area and additional mitigations the Proponent will implement. The Project has been sited to avoid all wildlife features, including the house, nest, den and lek of species of management concern; therefore the risk to wildlife features is considered low.

AEP-WM has ranked the Travers Solar Project proposed by Greengate Power Corporation, a low risk to wildlife and wildlife habitat, based on Project siting and commitments made by the Proponent to mitigate and monitor wildlife impacts. This AEP-WM Renewable Referral Report expires on March 18, 2024.

AEP-WM Referral Report Prepared by:

Signature:  Date: March 18, 2019

Printed Name, Position, and Office: Sarah Gray, Wildlife Referral Technician, South Saskatchewan Region, Operations Division, Grassland District, Lethbridge, Alberta

AEP-WM Referral Report Reviewed by:

Signature:  Date: March 18, 2019

Printed Name, Position, and Office: Kristin Cline, Wildlife Biologist, South Saskatchewan Region Operations Division, Grassland District, Lethbridge, Alberta

Signature:  Date: March 18, 2019

Printed Name and Position: Brandy Downey, Senior Species at Risk Biologist, South Saskatchewan Region Operations Division, Grassland District, Lethbridge, Alberta

B. PROJECT DETAILS

Project Name: Travers Solar Project (also referred to as the Project)

Proponent Name: Greengate Power Corporation (also referred to as the Proponent)

Project Location: Refer to Table 1

Table 1. Proposed legal land locations of the Travers Solar Project area

Quarter(s)	Section	Township	Range	Meridian
NW, NE	5	15	20	W4
NE	6	15	20	W5
SE	7	15	20	W6
All	8	15	20	W7
NW, NE	13	15	21	W13
All	17	15	20	W8
SE, NW, NE	18	15	20	W9
SE, SW	19	15	20	W10
All	20	15	20	W11
All	21	15	20	W12
SE, SW	24	15	21	W14

Project Area (hectares):

Total fenced area: 1619 ha
Disturbance footprint for construction phase (temporary): 1561 ha
Disturbance footprint for operation phase (permanent): 1561 ha

Nameplate Capacity (total megawatts): 400 MW

Facility Type: Photovoltaic (PV) solar facility

Solar Array Details:

Panel type: Static (fixed tilt)
Number of panels: 2,468,154
Panel row spacing: 9.5 m
Panel height (minimum-maximum): from 1.0 m to 4.2 m above ground level

C. WILDLIFE CONCERNS RELATED TO SOLAR ENERGY

Impacts to wildlife identified for all solar energy projects in Alberta, which forms the basis for project-specific review.

HABITAT LOSS, DEGRADATION AND FRAGMENTATION

Solar facilities may result in the direct loss of habitat for wildlife. Negative effects may include, but are not limited to, interruption of movement corridors, isolation of species and populations, shifts in composition and degradation of foraging/breeding/brood rearing habitat. There are particularly

negative effects to wildlife, especially species at risk, by siting solar energy facilities in areas of native grasslands. AEP-WM requires siting the solar facility and associated infrastructure (access roads, substation, etc.) on previously disturbed lands that do not contain sensitive features such as wetlands, to significantly reduce potential negative effects on wildlife habitat.

WILDLIFE DISTURBANCE AND MORTALITY

AEP-WM has identified concerns over the potential negative effects on wildlife caused by solar facilities and related infrastructure, including access roads, transformer/invertor stations, collection lines, and fencing. For example, solar projects may result in site avoidance and abandonment, decreased productivity, collision mortality, and trapping or stranding of wildlife.

Wildlife Movement and Fencing: Due to human safety concerns, solar photovoltaic sites are fenced to exclude people; this exclusion also impacts wildlife. Fencing can create hazards and barriers for wildlife, such as mammals, reptiles and birds. Fences can block or hinder daily wildlife movements, seasonal migrations and access to forage or watering sites. AEP-WM requires that solar projects are fenced in a manner to prevent harm or mortality to wildlife and to facilitate reasonable wildlife movement through or around the solar project.

Direct Mortality: Bird mortalities have been documented at a number of solar facilities in North America. Bird mortality related to PV facilities is caused by impact trauma, predation and starvation. The mechanism of mortality for birds appears to vary between the family groups. Passerines often fly at the height of solar panels and appear to be at a high risk of collision as shown by higher rates of mortality than expected at solar facilities in operation. One potential explanation for this mortality is that passerines are attracted to the solar facility because of nesting opportunities on the infrastructure or swarms of positive polarotactic insects (i.e. insects attracted by polarized light reflected off a surface) that congregate on the solar panels. Significant mortalities of waterbirds, such as grebes, loons and some ducks, have been detected at PV sites. Water obligate birds, such as grebes and loons, which fail to die on impact, become stranded because they require water to take flight and subsequently succumb to starvation or predation.

AEP-WM requires siting solar facilities away from areas with large concentrations of waterbirds, such as lakes, rivers, 'Important Bird Areas' and 'Wetlands for Tomorrow' wetlands. AEP-WM requires that three years of post-construction monitoring are conducted at all solar facilities to assess the risk of the facility to wildlife, as per AEP-WM policy at the time of the project commissioning. If mortality rates are revealed to be high, then post-construction mitigation measures must be implemented in consultation with AEP-WM. Additional years of post-construction monitoring may be required if mitigation is needed, as determined by AEP-WM. Post-construction monitoring will include carcass searches, searcher efficiency trials, and scavenger removal rate trials, and must meet the requirements outlined in the *Directive*.

PROJECT-SPECIFIC CONCERNS

Desktop and field investigations are required to determine the potential of the Travers Solar Project to affect wildlife and wildlife habit. Per Standard 100.2.1 of the *Directive*, the Proponent must complete the following pre-assessment wildlife surveys:

- Spring and fall bird migration surveys

- Breeding bird surveys
- Raptor nest searches
- Determination of habitat types

In addition, surveys must be conducted for species of management concern that may occur in and around the Project area. The proposed Project is sited within the following Key Range or Wildlife layers, as described within the provincial Wildlife Sensitivity Data Sets:

- Sensitive raptors (including ferruginous hawk, golden eagle and prairie falcon)
- Sharp-tailed grouse

Surveys for all of the above must be conducted following protocols outlined in the *Sensitive Species Inventory Guidelines,* as applicable. If a species of management concern is identified, AEP-WM requires that areas immediately adjacent to key wildlife habitats be avoided by appropriate setbacks as outlined in the *Directive* and *Recommended Land Use Guidelines for Protection of Selected Wildlife Species and Habitat within Grassland and Parkland Natural Regions of Alberta*.

D. WILDLIFE MONITORING PROGRAM

Completion of pre-development surveys and submission of information to the Fisheries and Wildlife Management Information System (FWMIS).

Research Permit and Collection Licence Number(s): 18-294, 18-267, 18-283

Pre-assessment survey data completed within two years of submission to AEP-WM:
Pre-assessment survey methods and results were provided in the *Travers Solar Project Renewable Referral Application* with clarifications provided in the *Travers Solar Project Responses Spreadsheet*.

Wildlife surveys conducted include:

- Spring bird migration surveys: April 4, 23, 24, and 25, and May 1 and 2, 2018;
- Fall bird migration surveys: August 20 and 21, October 10, and November 13, 14 and 15, 2018;
- Breeding bird surveys: early survey June 2 and 3, and late survey June 20 and 21, 2018;
- Raptor nest searches: April 4, 23, 24, and 25, May 1 and 2, and June 2, 3, 20, and 21, 2018;
- Sharp-tailed grouse lek surveys: April 4, 23, 24, and 25, and May 1 and 2, 2018;
- Burrowing owl surveys: call playback June 2 and 3, 2018; and,
- Habitat, vegetation and wetland assessment surveys: April 4, 23, 24, and 25, and May 1 and 2, and June 2, 3, 20, and 21, and August 20 and 21, and October 10, and November 13, 14, 15, 2018.

The Proponent has committed to keeping wildlife surveys current by completing additional site-specific wildlife surveys (i.e., raptor nest searches and sharp-tailed grouse lek surveys,) every two years until the Project is commissioned as per Standard 100.2.4 of the *Directive*. All wildlife related surveys (pre- and post-construction) and analysis of data are required to be conducted by experienced wildlife biologists as defined by the *Directive*. Survey results are to be submitted to the AEP-WM Fish and Wildlife Management Information System (FWMIS). The Proponent has committed to implementing additional mitigation measures if any new sensitivities or features are detected, as determined by AEP-WM.

If the Project has not been constructed within five years of this AEP-WM Renewable Energy Referral Report being issued (expiry date: March 18, 2024), wildlife surveys will need to be updated and a new Renewable Energy Referral Report will be required, as per Standard 100.2.5 of the *Directive*. Wildlife surveys that would be required may include, but may not be limited to, all those listed above.

E. SOLAR ENERGY FACILITY - AVOIDANCE AND MITIGATION OF WILDLIFE RISKS

Review of the proposed wildlife avoidance and mitigation strategies identified in the submission, in comparison with the Guidelines and Directive.

HABITAT LOSS, DEGRADATION AND FRAGMENTATION

Native Habitat: The Project area is located in the Mixed Grass Natural Sub-region of the Grassland Natural Region. Project infrastructure, including but not limited to solar arrays (mounted on fixed tilt racking supported by driven or helical piles), transformers, collection lines, substation, access roads, a perimeter fence, and staging area, etc., has been sited to avoid native habitat because the Project is sited entirely on cultivated land. This Project siting reduces the risk to wildlife habitat and aligns with the *Directive*.

Though the Project is sited entirely on cultivated land, there is a large patch of native grassland directly south of the Project and some smaller patches that surround the Project area. The Proponent has proposed mitigations that reduce the risk of introducing invasive plant species into these native grassland areas. Trucks and equipment will be regularly cleaned, particularly when leaving the site. Additionally, while the majority of the Project will be seeded with creeping red fescue, areas within 100 m of adjacent native grassland will be seeded with a mix of native june grass (*Koeleria macrantha*) and blue grama (*Bouteloua gracilis*). The siting of the Project has been identified by AEP-WM as a low risk for wildlife and wildlife habitat and the additional proposed mitigations further protects important native wildlife habitat; this is consistent with the *Directive*.

Valley Breaks: All infrastructure is sited a minimum of 100 m from mapped valley breaks. This is consistent with the *Directive*.

Lakes and Large Waterbodies: The Project siting has avoided named lakes, and large permanent watercourses. The nearest waterbodies in the area include Travers Reservoir (3 km west and 4 km south of the Project), and Little Bow Lake Reservoir (3 km south-east of the Project). This is consistent with the *Directive*.

Wetlands: The Proponent has identified 23 temporary marshes (Class II), 13 seasonal marshes (Class III), 2 semi-permanent marshes (Class IV), and 3 dugouts (Class III+). AEP-WM requires a 100-m setback from all seasonal and higher class wetlands (Class III+) and recommends avoiding direct impacts to lower class wetlands to protect sensitive amphibians and other wildlife that use these wetlands as habitat. The Proponent has committed to avoid all Class II wetlands and abide by the 100-m setback to all Class III+ wetlands with one exception. Approximately 50 m of upgrading to the existing Range Road 205 north of Highway 529 will occur within the 100-m setback to Wetland #25, a Class III wetland. A 60-m setback will be abided by during all construction activities around this wetland. The Proponent has committed to implement the following alternative mitigations when working within 100-m of this wetland:

- Road upgrading will be completed outside the amphibian breeding season (April to July).
    - If construction is required within this window erosion fencing will be erected and an amphibian salvage will be conducted prior to the start of construction to remove and relocate any amphibians.
- Construction will be completed under dry or frozen soil conditions.
- Low-impact construction equipment and vehicles will be used to reduce compaction and impacts to any overwintering amphibians.

All wetland setbacks will be clearly marked or fenced off during construction to ensure vehicle traffic does not occur within the wetland setback. During construction, erosion fencing will be erected if there is potential for water erosion to drain into the wetland. Minimum disturbance techniques, such as matting, reduced soil stripping, and frozen construction will be implemented throughout the Project as needed. An environmental monitor will provide regular supervision and monitoring of construction activities around wetlands to ensure that the proposed mitigations are adhered to. The monitor will have the authority to stop work if unmitigated impacts to wildlife are observed.

The Project siting and Proponents commitments to ensure minimum impacts to wetlands adequately protect the wildlife using the wetlands and therefore aligns with the intent of the *Directive*.

Watercourses: The Project siting has avoided all permanent watercourses and intermittent watercourses or springs. This is consistent with the *Directive*.

WILDLIFE DISTURBANCE AND MORTALITY

Wildlife Movement and Fencing: The Proponent has committed to installing the perimeter security fence using straight lines, squared corners and raising the fence two to three inches off the ground to prevent brood separation or wildlife entrapment. Due to county road setbacks, road allowances and a transmission corridor, the Project is divided into seven blocks of panels that are fenced separately. Fencing follows these linear features resulting in five narrow north-south corridors, which may trap and funnel wildlife between fence lines. Additionally, where these corridors parallel roads there may be an increased risk of road mortality to wildlife trapped between the fence lines as well as a human safety risk from collision with large mammals. The Proponent has proposed potential mitigations to reduce this risk including:

- Cattle guards (currently the best option for the public roads), and
- Unlocked gates (currently the best option for the transmission line corridor).

The Proponent will consult with the municipality and the Transmission Facility Operator (TFO) to determine if these mitigations would be appropriate and allowable on public roads and the transmission line corridor. If the municipality or TFO do not allow the preferred mitigations some alternative mitigations that may be considered are:

- Flashing lights,
- Ditches,
- Wildlife warning signs,
- Reduced speed limits,

- Regularly monitoring the fence lines for wildlife, and
- Reducing attractants near the roads (i.e., vegetation management).

After consultation, the Proponent will provide AEP-WM an updated Project footprint with the proposed mitigations included. If above mitigations are implemented the risk of wildlife entrapment caused by the fence will be reduced and the Project will be consistent with the AEP-WM *Directive*. However, if adequate mitigations are not implemented, there may be an elevated risk of wildlife entrapment and mortality, which would not align with the intent of the *Directive*.

Migrating Birds: During the three rounds of spring 2018 migration surveys a total of 1,438 birds from 44 different species were identified (~0.67 bird observations per minute). During the three rounds of fall 2018 migration surveys, a total of 491 birds from 20 different bird species were identified (~0.23 bird observations per minute). The most commonly observed species were the tundra swan, lapland longspur, and horned lark, which are listed as secure and are abundant in the Project area. There were seven species of management concern observed during the surveys, including common goldeneye, lesser scaup, redhead, ruddy duck, long-billed curlew, barn swallow, and short-eared owl.

The Project is located in close proximity to the Travers Reservoir (3 km west and 4 km south of the Project). The Proponent conducted additional migration surveys along the shores of the reservoir. During the spring 2018 migration 348 birds from 34 species were identified (~0.48 bird observations per minute) at these additional points. During the fall 2018 migration 8,916 birds from 71 species (~12.4 bird observations per minute) at these additional points. Twenty-one species of management concern were observed including many species of diving waterbirds, which are vulnerable to stranding at solar facilities, and thirteen listed species at risk. The Proponent has identified the Travers Reservoir as an important waterfowl staging area during fall migration. Consequently, the reservoir may act as an attractant to species of concern and Project infrastructure could lead to direct mortality of these species. The Proponent has committed to maintaining a 9.5 m distance between each row of panels to reduce the "lake effect" and the risk of sensitive waterbirds being attracted to the Project. These proposed mitigations are in line with then intent of the *Directive*.

Breeding Birds: During the 2018 breeding bird surveys 522 individual birds from 18 species were observed at the 29 survey points using an unlimited survey radius (~1.8 bird observations per minute). The most commonly observed species were vesper sparrow, horned lark, western meadowlark, and savannah sparrow which are listed as secure and are abundant in the Project area. Three sensitive species or species-at-risk were observed during the surveys including the chestnut-collared longspur, Sprague's pipit, and McCown's longspur. Twenty-two long-billed curlew and two horned grebe were observed incidentally. With the exception of one chestnut-collared longspur observation and the incidental observations of the long-billed curlew and horned grebe, all species at risk observed during the breeding bird surveys were recorded in the native grassland adjacent to the Project area. These results indicate that sensitive grassland specialists are not using the Project area for breeding.

The siting of the Project entirely on cultivated land significantly reduces the risk of disturbing/destroying breeding bird nests. Disturbance will be further reduced by completing construction outside the breeding bird restricted activity period (RAP; April 1 – July 15) when

possible. Construction will occur continuously over a two year period. Consequently, avoiding the breeding bird RAP will not be possible. Anticipating that disturbance will occur within the breeding bird RAP, the Proponent has committed to remove suitable nesting vegetation (e.g. hedgerows) and complete all necessary vegetation clearing prior to the start of the RAP. Additionally, the Proponent has committed to complete construction that poses a high risk to breeding birds (e.g. clearing, grading, etc.) outside of the breeding bird window, if possible. If any moderate or high risk activities must occur during the breeding bird period, nest sweeps within 100 m of the disturbance will be conducted. Nest sweeps will be completed no longer than 7 days prior to work commencement. If nests are detected, a species-specific setback (minimum 100 m) will be applied until young fledge. Nest status can be checked by an experienced wildlife biologist after the anticipated end date.

Given the Project siting, observed and expected species, and the proposed additional mitigations, the risk to breeding birds is assessed to be low; this is consistent with the *Directive*.

Raptor Nests: The Proponent identified only small amounts of hedgerow habitat in shelterbelts that would be suitable for raptor nesting. No raptor nests were identified and no raptors were observed during the breeding season. The Proponent has committed to implementing species specific setbacks and timing restrictions if a new feature is identified. Therefore, the Project aligns with the *Directive*.

Sharp-tailed Grouse Leks: The Project is sited entirely on cultivated lands which significantly reduces the risk of disturbing a sharp-tailed grouse lek. No sharp-tailed grouse leks were observed during any of the wildlife surveys. The only sharp-tailed grouse that were observed were recorded incidentally flying over the Project area and the Travers Reservoir during fall migration. However sharp-tailed grouse lek surveys did not adequately cover native grassland habitat within the 500-m buffer around the Project. To address this issue, the Proponent has committed to:

- Complete sharp-tailed grouse lek surveys in locations where 2018 survey coverage was inadequate in April 2019;
    - Specifically, surveys should provide coverage of native habitat found in SW and NW-16-15-20, SW-13-15-21, and SW-28-15-20;
- Repeat sharp-tailed grouse lek surveys over the entire Project area and areas within 500 m of potential native grassland habitat in April 2020 to keep surveys current;
- Provide the results of these surveys to AEP-WM; and
- Implement a 500-m setback from the edge of any identified sharp-tailed grouse leks.

Given that the Project is sited on previously disturbed lands, the alternative mitigations identified above and the site specific conditions, the Project is aligned with AEP-WM Policy (*Directive*). Deviations from the above must be provided to AEP-WM and AEP-WM will assess the risk as an amendment to this referral report.

Burrowing Owl Dens: The Project is sited approximately 3 km west of burrowing owl range. Under AEP-WM policy (*Directive*) the Proponent was not required to conduct burrowing owl surveys. However, due to the proximity of the burrowing owl range, historic observations of burrowing dens near the Project area and the availability of native grassland and pastureland adjacent to the Project area the Proponent voluntarily conducted burrowing owl call playback surveys across the

Project area. No burrowing owls or dens were observed within 500 m of the Project area during any of the wildlife surveys. Therefore, the Project aligns with the *Directive*.

Bird Mortality: Aboveground collector lines are a risk of avian mortality due to collision or electrocution. The Proponent has committed to installing electrical transmission and collection lines and cables underground, baring any engineering design constraints. It is expected that 98% of collection lines will be installed below ground. Where underground installation is not possible, the Proponent has committed to the following alternative mitigations:

- Aboveground lines will not be installed in areas of high bird activity such as around wetlands.
- Aboveground lines will be marked to prevent avian collisions.

These exceptions and alternative mitigations are in line with the intent of the *Directive*. Additionally, the Proponent has committed to mark the barbed wire portions of the exterior fence line to reduce avian collisions. To reduce wildlife-vehicle collisions, speed limits will be reduced onsite and posted throughout all Project phases.

The Project is sited away from named lakes, large permanent watercourses, valley/coulee breaks and on previously disturbed land, which reduces the habitat quality for wildlife and results in lower mortality risk for the Project. As described in the above *Migrating Birds* section, the proximity of Travers Reservoir may increase the mortality risk to migratory birds by attracting species of concern to the Project area. However, if mortality is found to be high, the Proponent has committed to mitigating wildlife mortality as discussed in the below section titled, *Post-Construction Monitoring and Mitigation*. Overall the risk of bird mortality is assessed to be low due to the Project siting and the Proponents commitment to monitor and mitigate any impacts.

CONSTRUCTION AND OPERATION MITIGATION

AEP-WM requires the construction and operation mitigation plan, which outlines construction techniques, mitigation and standard operating procedures, will meet the requirements outlined in Stage 3 of the *Directive.* The mitigations outlined in *Travers Solar Project Renewable Referral Application* and *Travers Solar Project Responses Spreadsheet* will be implemented with the intent to reduce disturbance to wildlife and wildlife features (house, nest, den, etc.). This does not preclude any liability under the *Wildlife Act*, the *Species at Risk Act*, or other legislation. AEP-WM considers all injured or dead wildlife found in the Project area during construction and operation of the facility to be caused by the facility. In the event that injured wildlife is found, AEP-WM will be notified and the Proponent will act in accordance with regulatory direction and requirements. All wildlife mortalities must be reported to AEP-WM.

POST-CONSTRUCTION MONITORING AND MITIGATION

AEP-WM requires the post-construction monitoring and mitigation plan will meet the requirements outlined in Stage 4 of the *Directive.* Post-construction monitoring for the proposed Project will include the following minimum standards (note that all surveys and analysis must be conducted by an experienced wildlife biologist as defined in the *Directive*).

Duration of Post-Construction Monitoring: Three years

Mortality Monitoring:

- Carcass searches will be conducted weekly during the migratory periods, and once every two weeks during the summer (i.e., between the migratory periods). Migratory periods for the Travers Solar Project area are from March 1st to May 15th and from August 15th to November 15th.
- Searches will cover one third of the Project area since the Project is greater than 10MW, as per Standard 100.4.4 of the *Directive*.

Carcass Removal and Searcher Efficiency Trials:

- Carcass removal and searcher efficiency trials (for each searcher) will be conducted throughout each monitoring year to provide corrected fatality rate estimates. Enough carcasses will be used to ensure reasonable accuracy and precision of the estimated rates for carcass persistence and searcher efficiency.
- Corrected mortality will be estimated using acceptable industry standard or current AEP-WM policy at the time, in consultation with AEP-WM.

Additional Survey Requirements:

- Notable wildlife observations as well as observed changes in wildlife behavior, species composition, or potential threats to wildlife during the post-construction monitoring period will be documented and reported.

Reporting:

- A detailed report of the post-construction monitoring will be provided to AEP-WM and the Alberta Utilities Commission (AUC) annually by the end of January each year, or acceptable alternative, following the mortality monitoring period, as per Standard 100.4.7 of the *Directive*.

Details of the post-construction monitoring plan should be reviewed and finalized prior to implementation, to ensure compliance with policy at the time. A Wildlife Research Permit and Collection Licence must also be obtained from AEP-WM prior to conducting the post-construction monitoring surveys.

Should carcass surveys, at any time, result in unusually high fatality numbers or fatalities of species at risk (provincially and/or federally listed, including species listed as 'sensitive' provincially) carcasses must be collected, frozen and submitted to AEP-WM. The Proponent must *immediately* notify AEP-WM and the AUC of the mortality event and then discuss mitigation measures. The Proponent has committed to implementing the post-construction monitoring and mitigation in accordance with the *Directive*.

The Proponent has committed to operational adaptive management strategies related to avian impacts or other wildlife disturbances related to the operation of the Travers Solar Project. Should adaptive management be required, specific strategies will be developed and implemented in agreement with AEP-WM. Potential mitigation measures for excessive wildlife fatalities may include, but are not limited to:

- the use of avian deterrents;
- white gridlines on solar panels;
- installation of bird deterrents;

- installation of nest deterrents to prevent nesting of raptors/corvids; and
- any mitigation that is deemed appropriate based upon the site specific circumstances following consultation and agreement by AEP-WM.

Mitigation plans will be submitted for review and agreement by AEP-WM. If post-construction mitigation is required, as determined by AEP-WM, at least two additional years of monitoring will be required to determine if the mitigation is successful at reducing the fatalities to acceptable levels, as per the *Directive.* The Proponent has committed to abiding by the *Directive*, as summarized above, by implementing the post-construction monitoring and mitigation plan; therefore, the plan is consistent with AEP-WM policy.

ENVIRONMENTAL PROTECTION PLAN

TRAVERS BESS

NE-13-015-21 W4M

Prepared for: **AXIUM INFRASTRUCTURE CANADA II LIMITED PARTNERSHIP**

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ENVIRONMENTAL PROTECTION PLAN

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VERSION CONTROL

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