

**Nelson Family Ranches formal response to the request for clarification of LA18058A.**

On October 20, 1998 we received our permit regarding our feedlot expansion. Due to the size of the expansion there was a lot of work that went into the application. As part of that application we met with neighbours and others who may be affected by the expansion. In our application documents from the County of Warner, my dad Grant Nelson met with Jake Hofer and got his approval for the expansion. Jake referenced 3 main concerns.

1. Dust suppression
2. Manure disposal with 24 hours
3. Fly control

We have always tried to be good neighbours. If this was not the case Jake would never of trusted us with our expansion proposal. Since that expansion we have tried to be respectful and good stewards of the feedlot we operate.

To the best of my memory, in early 2000's, there were some dry years and feedlots were dusty. Weather patterns shifted for a few years and we had excessive rain and flooding. In 2006 weather patterns shifted again and we were hit with drought. In making good to the promise my dad made to Jake we installed our watering system. We looked into options and designed a logical system for irrigating our pens. We mobilized very quickly and had a watering system in place by end of summer 2006. Materials cost us around \$40,000 plus labour to install it. Our system was not perfect but we were one of the first in Alberta to implement such a system.

The last few years have been excessively dry and put a greater demand on our system and staff to keep the pens watered. Our last system was very labour intensive and we wanted to make it easier. To make our system more user friendly and easier to operate we invested

another \$30,000 in system upgrades and another 30,000 in a mobile water truck. It has taken us the last two years to complete these upgrades. Since upgrading our system and dramatically increasing our watering times we have had an increase in complaints against us. It is well known among the industry that most feedlots do not have a watering system. We put ours in to support our neighbors and to take care of our animals.

Our increased efforts and investments in watering have done little to help resolve conflict with adjacent neighbors. It gets old real fast to work at and invest in dust reduction when the complaints continue to come in regardless of effort and resources invested. We have invited NRCB inspectors to tour our feedlot anytime. In the last 3 years the NRCB has been out probably 30-40 times per year for site visits. On site visits inspectors commended us for our efforts and investments into our dust reduction. Are our sprinklers knocking down 100% of the dust? No; but knocking down all of your dust is an unrealistic expectation. As long as you control the majority of your dust then dust will not combine together and make a large slow moving dust cloud.

### **Original Application**

In 1998 my dad made his application to expand our feedlot. In his original application we gave a representation of what we would be housing in our feedlot. Our original County of Warner application used these numbers.

7000 Finishers  
1000 Feeders  
500 Cows  
50 Bulls

The application showed exactly what we asked for which was to house 8550 animals which included our breeding stock. According to guidelines set by AOPA we are adhering to the standards set for space allocation per livestock size. See chart below for animal size and space allocation required.

Type of Livestock	Space allocation (sqft/hd)	Calculated Animal #s
Cows/ Beef finisher 900 lbs+ Southern Alberta	200	6,856 *
Cows/ Beef Feeder 450-900 lbs Southern Alberta	175	7,836
Feeder Calves (<550 lbs) Southern Alberta	150	9,142

\* the space allocation per head if 7,000 beef finishers were accommodated within the existing pens is 195.9 square feet.

Controlling agencies are put into place to help and protect both parties, for example the farmer and the neighbor. Regulations are amended or created over time as governing bodies see a need for clarification. Take for example the feedlot capacity numbers. In 1998 AOPA added clarification on the size of animals and their imprint left on a feedyard. This is an example of industry evolving because there is no comparison between the imprint left by a 450 lbs steer calf to a 1500 lbs steer. AOPA's guidelines have given clarity to all 3 parties involved as to how much space should be allocated per lbs of animal. The NRCB proposal is to have Nelson Ranches held to the same current standard as all other Alberta Feedlots. We have always interpreted our 7,000 head number to mean 7,000 head at their largest point or finishers. If you have smaller animals then you can have more. The chart for manure production is shown below.

According to my calculations 4 calves produce as much manure as 1 finisher in a year. This backs up that there is not any reason to classify animals so far apart the same. From the calculation we have done we are allowed 7,000 head x 2.2 mt per year = 15,400 mt per of manure production. This is what is laid out as a regulation and just like everyone else we are to stay within it.

	<b>Cows/Finishers (900 + lbs)</b>	<b>2.2</b>	
	<b>Feeders &lt;900 lbs)</b>	<b>1.4</b>	
	<b>Feeder Calves (&lt;550 lbs)</b>	<b>0.54</b>	

**Living next to Gravel Road**

Hofers live next to the county gravel road that we use to access our feedlot. There is a lot of traffic that passes by on that road both public and other surrounding farmers. When living in rural Alberta it is not realistic to expect there to be no dust emitted off gravel roads. Usually in the evening when the wind stops gravel road dust can haze up to 30 minutes or longer after a vehicle passes. We understand this is not ideal but we live next to a busy gravel road as well. There is large amounts of town and public access that kicks up dust around our homes and yards. This is a factor that is out of our control and we believe the county strives to maintain and provide dust retention to the best of their ability, but at the end of the day it is a gravel road that naturally produces dust. In years past Nelson Family Ranches has paid for dust suppression on the County road that passes Hofers home and watered the road with our own equipment to try to do our part.

We understand the challenges that come when you live between 2 feedlots but we also want you to know that we purchased the feedlot from the Hofers. We try hard to be good neighbours and this is why we are working on solutions. The closest house in proximity to the closest pen at Hwy 52 Beef Producers is around 800 ft according to google earth. Our closest pen is over 1660 ft away from the closest house. In the past we have all worked closely with each other. Richard used to borrow our truck and until recently Rod Hofer worked with Hwy 52 Beef. Today we know how far the two parties are and wish there was a way to put this behind us.

## **RCC**

In the Summer of 2018 we invested over \$1,000,000 in installing RCC in our pens. Studies have shown that there is less dust on RCC pens floors and we know this will help in dust reduction. We are monitoring how much benefit there will be but common sense proves that having a concrete floor will help keep down dust by separating the dirt and manure. We feel this will help the situation.

## **Summary**

In summary we feel that the amendment of the permit is good for both parties. In reviewing the 300 plus pages filed on this issue there can be arguments made for both sides. The legal terminology found within can be confusing and hard to read for both parties. The NRCB is using countless legal hours and Hofers as well. This is evident by the countless emails I receive each week for about this topic. Costs are skyrocketing for all parties. Neither party is getting ahead if we keep arguing and trying to prove who is right. We have upgraded our system as per Hofers and the NRCB request. With our upgrades our system is as easy to operate as any system in alberta. In the last 3 years NRCB has had over 40 site visits per year to help hold us accountable. In those visits there has not been very much room for improvement. With the upgrades, NRCB's inspections, our GAAP certificate, and our commitment to control our dust we are abiding by all rules and regulations set by Alberta's governing bodies. We didn't ask for clarification to the number because we have always assumed that we are the same as every feedlot. We have always tried to uphold own family name as a fair, honest and hard working faith centered family farm. In this process all we ask is to be treated fair.

Sincerely

Shawn Nelson

**Nelson Family Ranches**

**Attachment A.**

# GENERAL ACCEPTED AGRICULTURAL PRACTICES CERTIFICATE

ACKNOWLEDGES THAT AS A RESULT OF A PEER REVIEW COMMITTEE HEARING

**Nelson Family Ranches Ltd.**

Located at NE 7-6-19 W4

IS OPERATING WITHIN GENERALLY ACCEPTED AGRICULTURAL PRACTICES IN DUST MANAGEMENT.  
CERTIFICATE IS INVALID IF PRACTICES ARE NO LONGER IMPLEMENTED OR CURRENT.



*Neil Caci*

SIGNED, Honourable Neil Caci, Minister

**Alberta** Agriculture  
and Forestry