

Response to LA 18085A

There are a few points that we would like to draw attention to in our response to the Hofer's submission.

1. Treated equal

We have always interpreted the 7000 head to be based on the size of the animal ever since the standards changed in 2002. Our interpretation is that we were grandfathered in and would be aligned with current industry standards. The NRCB has created standards and guidelines to create equality between all feedlots. These guidelines prevent inequality from one party to the next. We do not feel that by following the current guidelines we were being dishonest or unfair to neighbours. The amount of feed, and manure has a direct correspondence to the size of the animal, the smaller the animal the smaller the imprint it leaves. We have not increased our imprint in anyway.

2. NRCB Bias

The role of the NRCB is to respond to complaints and enforce industry standards. The NRCB has responded to the complaints against our feedlot multiple times over the last 3 years. I do not have the records from field inspectors, but over the last 3 years I would estimate there have been 100 site visits and weekly phone calls during spring, summer, and fall. These are not friendly visits. Each visit our feedlot is critiqued and analyzed which puts strain on our employees and business. The NRCB is trying to hold us to a higher standard than all other CFO's, because of the consistent complaints from one neighbor.

3. Low animal numbers during Summer months

The majority of complaints are during the hot dry summer months. During this time we are rebuilding fences, hauling manure out, rebuilding dirt bases, and installing rolled compacted concrete. It is difficult to do all this while pens are full, which is why we do this after animals are shipped to slaughter. We have provided numbers to the NRCB field inspectors and they show our feedlot is rather empty during those months. It is not unrealistic that we are below 4000 head in those months. In our opinion the dust complaints are not related to number of animals because the feedlot is well below 7000 animals at that time of year. We acknowledge that there is dust during those hot dry months, especially at dusk when animals start to kick up dust right before dark. Our sprinklers help to combat this problem but they will not control 100% of the dust.

4. Denial of application LA 18067

NFR has recently applied for a CFO at their current calving facility. This location is located 2.6 kms SE of the Hofers residence. See attachment "A" below. In their nearly 40 page document, Hofers stated they want a full denial of our application LA 18067. We think this is a great location for a CFO because it is away from neighbours. We also feel it can ease some of our numbers, if needed, from our main lot. Hofers opposing this designation seems petty. Hofers complaints against us are endless. Everything from feedlot numbers, to CFO location, CFO expansion, sprinkler quality, dust retention, air quality, or county road dust. On our end it feels like they are opposing everything that we are trying to do, even if it is for their gain. We hope when this is dealt with that both parties can start to find common ground and start repairing friendships.

Sincerely

Shawn Nelson

Nelson Family Ranches

Attachment A.

