

Town of Coalhurst Response:

- 1. Double H Feeders has made representations related to its operation on NW 22-9-22 W4. The relevance of the operation at that site, which operates under a distinct NRCB permit, to the expansion application is not clear to the Board. Parties, including the County and the Town, may wish to address this in their submissions.**

For the purposes of land use impacts the Town has historically viewed the two barn locations as one entire operation as the barns were under the control and direction of one landowner. Prior to the correspondence from the NRCB dated January 7, 2022, the Town was not aware that the Double H Feeder operation had separate permits for the barns located in lands in each of the quarter sections (NW & NE 22-9-22 W4). From the Town's perspective, in their deliberations on the expansion proposed, both locations were considered one entity.

- 2. How does the Town's statement of support for the expansion (April 8, 2021 letter to the County) support the objectives of the provisions in the IDP?**

The Town Council met with the applicants April 6, 2021 to review the proposal to construct a new broiler barn and decommission the existing barn. The Lethbridge County and Town of Coalhurst Intermunicipal Development Plan (IDP) was negotiated between the two municipalities for the purposes of promoting coordinated and efficient development within the joint plan identified in the plan. Part of the discussions and policy development included dividing the IDP plan area into smaller planning areas with a land use concept developed for each one.

The Double H Feeders lands, which contain confined feeding operations (CFO) specifically the NW & NE 22-9-22 W4M, fall within Planning Area 2. The existing barn proposed for decommissioning is located on a small, titled area on the NW 22-9-22 W4M and lies within Sub-planning Area G. This Sub-planning area has been identified for future development of additional country residential uses. This land use strategy decision was based on the current fragmentation of the lands and the existence of country residential uses in the immediate area.

The proposed location for expansion in the NE 22-9-22 W4M is also located with Planning Area 2 and has been identified for agricultural uses within the IDP. Specifically, policies 3.4.5 and 3.4.6 identify that the long-term use of those lands within the IDP plan boundary to be agriculture. As per the IDP, Planning Area 2 Land Use Concept, the subject lands are purposed to remain in the current state of agricultural production. Consideration of the existing uses as well as the largely



unfragmented, full quarter sections of land located on the periphery of the IDP plan area influenced the decision to support agricultural operations on these lands.

The Town supported the expansion of the CFO in the NE 22-9-22 W4M, which included the decommissioning of the current barn in the NE 22-9-22 W4M as the proposal meet the following policy objectives of the IDP:

- The existing facility, which is in close proximity to the Town Boundary would be relocated further away from the corporate limits.
- The long-term development concept promotes the development of residential uses in the location of the existing barn and the discontinuation of a use that is not compatible with additional residential development supports the long term development strategy of both the Town and the County.
- Consideration was given to the proposed location of the new barn, which was east of the Town, and it was determined that the new location would be less likely to impact urban residences with any noise, odour or dust impacts that might be emitted from the operation as the location is down-wind of the prevailing west and north winds.

**3. *Is the Town's statement of support contingent on Double H Feeders' proposal to abandon the operation at NW 22-9-22 W4?***

The letter of support from the Town of Coalhurst was based on the information presented to Town Council at the April 6, 2021 Council meeting in which the applicant's stated that the barn in the NW 22-9-22 W4M would be decommissioned. The letter to Lethbridge County clearly stated that the proposal that Council reviewed and provided support to included the decommissioning and abandonment of the existing barn closer to the Town of Coalhurst.

The Town of Coalhurst believes that an expansion in the current location would not be in the best interest of residences of Coalhurst or the County and would withdraw support of the application if the decommissioning of the barns in the NW 22-9-22 W4M are not a condition of any future approval.

**4. *What public consultation was conducted by the County and Town in the course of the MDP and IDP development?***

The plan preparation was completed in compliance with the requirements for statutory plan preparation in accordance with the Municipal Government Act in effect at the time the plan adopted in 2014. The County and Town held a public open house at the Coalhurst Community Centre on June 25, 2014, in which approximately 60 people attended. In addition, each municipality held separate public hearings as per the Municipal Government Act, Section 692 which was advertised in the local newspaper in accordance with the section 606 of the Municipal Government Act.

**5. What are the municipal planning objectives related to the establishment of the confined feeding operation exclusion zone on the lands associated with the Double H Feeders operation?**

The Town's municipal planning objectives related to the establishment of an CFO exclusion zone in close proximity to their corporate boundary include the following:

- Reducing the nuisances associated with the keeping of livestock in confinement including noise, dust, odours and traffic that are associated with these types of operations.
- Considering the lands subject to the exclusion of the development of new operations upwind of the Town of Coalhurst as well on excluding those lands that are of interest for the future for expansion of the Town boundary. It is the intention of the policy to promote development in close proximity to the Town that is compatible with urban residential uses.
- The Town acknowledges the existence of existing operations within the CFO exclusion area and agreed through the adoption of the IDP that expansions of CFO operations could be supported if the purpose was to upgrade to more modern operating premises and processes. The proposed new facility will be required to be constructed and operated as per current construction requirements and operate under current best practices for CFOs.

**6. What assistance can the Town and County provide the Board in determining the intent of the term "primarily agricultural" land referenced in the IDP?**

It is the understanding of the Town, the land referred to in the IDP as "primarily agricultural" was to allow current and or similar agricultural uses to continue on lands near the periphery of the IDP Plan Boundary. This would mean that isolated industrial or additional residential use would not be permitted to establish on these lands and would be directed to those lands identified in the Land Use Concept. Conversely, certain agricultural uses may not be supported on those lands identified for non-agricultural uses.