

RFR Rebuttal Letter

To: Laura Friend, Manger, Board Reviews
Natural Resources Conservation Board
John J. Bowlen Building
#901, 620-7 Avenue SW
Calgary, AB T2P 0Y8

Date: September 27, 2022

Subject: Re: NRCB Notice of Filed RFRs and Rebuttal Opportunity for
G&S Cattle LTD. RA21045

From: Ed and Mary Buczny
[REDACTED] Westeros, AB T0C 2V0
Legal Land Description: SE-33-046-02—5 2-0-9-121631

Email: [REDACTED]

Status: Directly Affected Party

List of Attachments: Letter of Concern

We totally agree with the NRCB decision of September 13, G&S Cattle Ltd. RA21045, to deny the construction of a 4000 beef finisher confined feeding operation should stand. **A request for review should be denied.**

We maintain that the approval officer's conclusion that the application would have a negative effect on the community is sound.

We agree with the approval officers assessment that the CFO would have adverse effects on the community. The approval officer had a large amount of information about the potential adverse effects on Pigeon Lake. Furthermore, he received concerns from a great number of property owners considered to have "directly affected party" status in law and many more who by virtue of owning property in the Pigeon Lake watershed would certainly be directly affected by any development that compromised the water quality of Pigeon Lake.

We disagree with the statement that the decision misinterprets the extent to which the Pigeon Lake Watershed Management Plan represents the community interest. The PLWMP has been adopted and is supported by all of the Pigeon Lake Summer Villages, as well as the County of Wetaskiwin and the County of Leduc.

We firmly believe that if the CFO has any negative impact on the water quality of Pigeon Lake, it will by extension have a negative impact on our community is intricately linked to the water quality of Pigeon Lake.

We find it reprehensible that the effects of the decision on the applicant are even mentioned in this request for review. In our view, the aspirations of the applicant should not be a consideration in a decision about compliance with legislation and statutory plans.

The request for review provides no evidence of the potential impact of the CFO own meeting “consumer demand for beef and other commodities on an international scale”. Furthermore, it does not provide evidence that the CFO would have a net positive impact on the local and regional economy. The potential negative impacts on other businesses in the region are not mentioned.

If Pigeon Lake becomes a less desirable place to live and visit because the feedlot in any way affects the quality of water in Pigeon Lake, the viability of local businesses, including those at the Village of Pigeon Lake, will be affected. We value the goods and services we can get locally, including the the Village of Pigeon Lake.

We trust that the interests of those of us who are directly affected parties in regard to this application are given due consideration and that G&S Cattle Ltd.’s request for review will be denied.

Sincerely,

Ed and Mary Buczny

Ed and Mary Buczny

[REDACTED]
Westerose, AB T0C 2V0
465018 RR 23, TWSP 470

[REDACTED]
[REDACTED]
March 22, 2022

Re: Application RA21045
Greg Thales and G&S Cattle Ltd.
NW 3-47-2 W5M

To Whom It May Concern:

We are full-time residents of the County of Wetaskiwin, owning a property in close proximity to this proposed Confined Feeding Operation. We STRONGLY object to this application without having assurances that it will not have negative impacts on us, personally, and on our community. We appreciate that not all of our concerns fall under the jurisdiction of the NRCB and are therefore sending them to other agencies as well.

Our primary concerns relate to the potential environmental impacts of this project.

It is critically important that the potential environmental impacts of this proposed project be researched thoroughly before this application is considered by the NRCB. We trust that there will be an independent, comprehensive environmental impact assessment required. The proposed project could affect two important watersheds: Battle Lake and Pigeon Lake. We understand that the Pigeon Lake Watershed Association has already raised concerns about a feedlot operation of this size in such close proximity to Pigeon Lake, which is well-known to require protection to ensure that it remains a valuable economic and recreational resource in the region.

- Has the applicant had research done on the potential impacts on the two watersheds?
- As the potential impact on Pigeon Lake is of broader concern than just to property owners within 1.5 miles of the proposed site, the findings from impact research on the Pigeon Lake watershed should be distributed to ALL property owners in the watershed. Will this be done?
- What chemicals /hormones will be added to the feed? We have concerns about these eventually leaching and contaminating our water supply. Will there be a requirement for regular water quality monitoring, with the results shared with nearby property owners?
- There have been concerns about ground water decline in this area. Has a ground water study been completed for this project, taking the possibility of weather fluctuations into consideration (e.g. supply of water in drier years)? What additional demand would this operation place on ground water in the area?
- This area is an important habitat for several species, including ground nesting birds and reptiles (frogs, toads). Will the potential impacts on habitat be assessed as part of a broader environmental impact assessment?

- The feedlot will generate copious amounts of manure. We are concerned about manure odor at the operation and when the manure is being trucked for spreading in the area. We are also concerned about dust from the pens and secondary ammonia. How will these matters be dealt with? Has an air quality impact assessment been completed? We have serious concerns that the air quality impacts of this feedlot will affect our quality of life if we are no longer able to enjoy being outdoors on our property.
- What pest control is planned/required? (e.g. flies)

Other concerns and questions we have at this time about this feedlot operation are:

- The approval authorities and processes for this proposed project. Will the NRCB be assessing whether this project would be in the public interest? If so, what factors will be considered in assessing whether it would be in the public interest? What will the County of Wetaskiwin require before it approves the use of this land for a feedlot of this size in such close proximity to Pigeon Lake?
- Will an economic impact assessment that considers the potential impact of the project on property values in the area be required prior to approval?
- Will a traffic impact assessment be required prior to approval? It can be expected that the proposed feedlot will generate additional traffic on area roads, with large, heavy trucks carrying water, feed and transporting animals to and from the feedlot. What truck traffic will be generated by this operation? What will be the impact on roads and road safety in the area and on the movement of area residents? Hwy 771, TWSP Rd 740 and the Trans Canada Trail in the area are also used by recreational and competitive cyclists and many motorcyclists from nearby cities. How will the additional truck traffic affect the safety and enjoyment of the recreational users of these roads?
- Will a noise impact assessment be required, considering the noise from large trucks coming and going from the feedlot?
- Will Alberta Environment and Parks be assessing the potential impacts of the proposed project on Pigeon Lake Provincial Park? (e.g. park use and user enjoyment if odors from the feedlot waft over the park)
- Will an archaeological and historical assessment be done before the project is approved, considering that First Nations peoples have resided in the area for centuries? Will the four Maskwacis First Nations be consulted about this project? Will information be provided to them about the project and will input be sought from them about their potential concerns?
- Have all the Summer Villages around Pigeon Lake been informed about this project and has input been sought from Councils and residents, considering that this project could potentially affect the lake and future property values at Pigeon Lake?

We appreciate having an opportunity to bring these concerns to your attention and look forward to the additional information about this application that will be forthcoming with our questions being answered.

Sincerely,
Ed and Mary Buczny