

Downsview Farm Ltd. (Garrett & Erin Davis)

Acme, AB
TOM OAO

March 29, 2023

Re: Application RA22026
Rimrock Cattle Company Ltd.
Middle of Section 28-29-25-W4

Attn: Laura Friend, Manager, Board Reviews Natural Resources Conservation Board (NRCB)

We are writing to you in response to the request to review the NRCB approval officer's decision, as a directly affected party of the Rimrock Cattle Company Ltd. regarding their application to expand their confined feeding operation (CFO) at section 28-29-25-W4M. The application states that the CFO is applying to expand from their current 14,000 head operation of beef feeder (7,000 head) and beef finisher (7,000 head) operation, to an exclusively 28,000 head beef finisher operation.

Please find in this letter our statement and reasons for concern over the application to expand the CFO. Our main concern involves but is not limited to water quality, quantity, use and consumption because of this proposed expansion.

With the CFO current livestock numbers, their cattle's water requirements would be approximately 119,000 gallons per day (gpd). Their request to move from 14,000 head beef feeder/finisher to 28,000 head of beef finishers, would increase their water requirement to approximately 280,000 gpd. This produces a minimum daily water requirement increase of 135%. This is also not taking into consideration any days with temperatures higher than 25 degrees Celsius, which would then cause cattle's water consumption to approximately double.¹ *(These numbers are based on the average daily water requirements as listed on the Government of Alberta livestock tools website. Animal size determined based on the assumption that many of the CFOs cattle are of Angus (British) or Simmental breeding. These breeds have been classically known to start in a feeder program with weights ranging from 700 lbs to 800 lbs. which would result in a daily water requirement of approximately 7 gpd. These breeds could then finish out in a feedlot with weights ranging from 1250 lbs to 1600 lbs, increasing their water requirement to a minimum of 10 gpd. A final weight of 1250 lbs were utilized in calculating gpd for this letter, as to not overestimate, since exact data of cattle housed at the CFO are unknown and not publicised.)*

The Rimrock Cattle Company currently holds a License to Divert Water from the Government of Alberta (License number 00466770-00-00) in which it utilizes water pumped from the Kneehill Creek to "... divert up to 156,892 cubic meters of water annually from the source of water for agricultural feedlot purposes." ² The License also states that, "The Licensee shall divert the water authorized by this license

¹ Government of Alberta. *Average Daily and Annual Water Requirements*. 2022.
https://www.agric.gov.ab.ca/app19/calc/livestock/waterreq_dataentry2.jsp

² Government of Alberta. "LICENCE TO DIVERT WATER License number 00466770-00-00." March 17. 2021.

only when there is sufficient water flow in the source of water to meet or exceed the Red Deer River Water Conservation Objective... from April to October (during the proposed May to September irrigation season)".³ This License to Divert Water was obtained, from our understanding, as a need to gain access to an additional water supply for their cattle's consumption, since their existing groundwater supply was insufficient.

Since obtaining the License to Divert Water, the CFO's water availability appears to be currently adequate for the time being, but we are concerned about the increase of water consumption this expansion would require and its resulting effects on local groundwater supply, the future environmental impact, and its cumulative effects on water quality and water availability in the years to come.

Our farm is located directly East of the CFO. We manage a cow/ calf operation where we calve out an average of 250 head of cattle every year. In the winter, we rely on ground water for our cattle's daily water intake requirements. Then in the spring and summer our cattle are moved to pasture located on the Kneehill Creek, which our cattle use as their source of water. Our cattle operation relies on year-round water sources that will be directly impacted by this expansion.

Another concern that we would like addressed is clarity on future construction. The courtesy letter we received states that, "no construction is proposed in this application." Yet, in Part 1 of the Application, the letter from the President of the Rimrock Cattle Company states, "However, we continue to do research on animal welfare and husbandry and would like the option to complete the other rows of pens before December 31, 2023, as part of Approval RA17076." We would like clarity on this aspect of the application as to the projected maximum capacity that the CFO would like to achieve. Are even more future expansions goals looking to be obtained?

As stated in the beginning of this letter, water is a major concern of ours with this proposed expansion, as we fear its direct effects on our own cattle operation and our livelihood. While water is our main concern, this expansion would pose further issues regarding increased odour, increased traffic and road use, and an increase of predators (i.e., coyotes). We not only conduct our farm business directly East of the CFO, but we are raising our family on our farm and the concerns listed above would be impactful to our families' daily lives.

We would like our concerns addressed prior to moving forward this application to protect our neighboring environment, our ecosystem, and to ensure a sustainable future for our community and future generations.

Sincerely,

Garrett & Erin Davis
Downsview Farm Ltd.
SE – 34 – 29 – 25 – W4

[REDACTED]

■ Government of Alberta. "LICENCE TO DIVERT WATER License number 00466770-00-00." March 17. 2021.