

In the matter of a Request for Review
under section 25(1) of the
Agricultural Operation Practices Act, RSA 2000, c A-7
of a decision by an Approval Officer set out in
Decision Summary LA23050

SUBMISSION OF NRCB FIELD SERVICES

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On behalf of NRCB Field Services

Introduction

1. Six parties have requested that the NRCB Board review the decision of the Approval Officer in file LA23050 (Hutterian Brethren of Ivy Ridge). All six parties filed responses to the application, and all were determined by the Approval Officer to be directly affected by the application.
2. To assist the Board in determining whether or not to schedule a Review on this matter, the NRCB provides original responses to application LA23050 as filed by these six parties (see **Part A** below, and Appendices A-H).
3. NRCB Field Services takes no position on whether the Board should dismiss the requests for review (RFRs), or schedule a review. The principles of finality and impartiality prevent NRCB Field Services from taking a position on the outcome.
4. NRCB Field Services does not routinely make submissions on RFRs. In this case, three issues raised in the RFRs merit a brief response:
 - a. One issue raised by the M.D. of Willow Creek was not raised in their responses to the Approval Officer (**Part B** below);
 - b. The number of responses received by the Approval Officer, including a correction (**Part C**); and
 - c. An allegation of bias (**Part D**).
5. Finally, to assist the Board in making a timely decision, NRCB Field Services draws attention to information in the decision documents related to wetlands and riparian areas, and to water table (**Part E**).

A. ORIGINAL RESPONSES TO APPLICATION

6. For each person who filed an RFR, we are providing the Board with their responses to application LA23050. Redacted for unnecessary personal information, these are:
 - a. Appendix "A": Response from Terry Olsen dated June 10, 2024;
 - b. Appendix "B": Response from Chelsey Hurt dated July 18, 2024 (yellow highlighting in the original);
 - c. Appendix "C": Response from Bev Olsen dated July 18, 2024;

- d. Appendix "D": Response from David Olsen dated July 18, 2024;
 - e. Appendix "E": Response from Greg Olsen dated July 18, 2024;
 - f. Appendix "F": Response from Sarah Olsen dated July 18, 2024;
 - g. Appendix "G": first response from M.D. of Willow Creek dated June 19, 2024;
 - h. Appendix "H": second response from M.D. of Willow Creek dated July 18, 2024.
7. At this time, we are not providing the Board with responses from people who did not file an RFR, or with the signed petitions. An example of a signed petition is at Appendix "I" of this submission.

B. NEW ISSUED RAISED BY M.D. WILLOW CREEK

8. In RFR #6, the M.D. of Willow Creek asks that additional conditions be added to Approval LA23050, based on three reasons. The third reason relates to access to the proposed CFO from a municipally controlled road.
9. As the M.D. of Willow Creek did not raise the issue of road access in their two responses to the application, the Approval Officer did not have an opportunity to address this issue in her decision.

C. NUMBER OF RESPONSES

10. Three RFRs suggest a few hundred objections were excluded from the Approval Officer's consideration (727 vs 397). Chelsey Hurt mentions 749 individuals (RFR #2, pdf p 6/10) and then 727 individuals exclusive of directly affected parties and others that submitted a longer letter (pdf p 7/10). Bev Olsen mentions "over 700" responses (RFR #3, pdf p 8/8). Greg & Sarah Olsen mention 727 submissions exclusive of additional letters from the public and directly affected parties (RFR #5, pdf p 7/8).
11. Decision Summary LA23050 discusses numbers of respondents at section 7 (p 5), and in Appendix B (pp 16-32). Section 7 reports 427 responses from 440 people (including the Town of Stavelly). These numbers differ as, on occasion, one response is from more than one individual (e.g. Paul and Jodi Husted). Of the 440 total people,
- a. 16 people were determined to be directly affected – these individuals are listed at the top of Appendix B of the Decision Summary;

- b. the remaining 424 people were determined not to be directly affected and living on or owning land outside the notification distance –
 - i. 27 of these people (including the Town of Stavely), listed in **Table B1** of the Decision Summary, submitted their own individual response; and
 - ii. 397 people listed in **Table B2** signed the petition.

12. Upon receiving the RFRs, the Approval Officer re-examined the file and the e-mails received in response to application LA23050. As a result of this examination, she found one additional signed petition from an individual : Cory Flood from Medicine Hat (Appendix “I”). This individual should have been included in Table B2. As corrected, the total number of individuals in Table B2 should have been 398, not 397. Also, the total number of respondents identified in section 7 of the Decision Summary should have been 441, not 440. NRCB Field Services apologizes for this oversight and is grateful for the opportunity to make this correction.

13. Each individual is listed only once in Appendix B of the Decision Summary. Some individuals signed the petition and also submitted their own individual submission. Those individuals appear in Table B1 only, not in Table B2.

14. Similarly, some individuals submitted the same response multiple times, and the Approval Officer counted those as one response.

15. The NRCB received numerous e-mails over the course of this application. In terms of petitions, on June 17, 2025, the NRCB received an e-mail with nine petitions. Between July 14, 2025 at 10:37 a.m. and July 18 at 4:23 p.m., the NRCB received eight e-mails from Chelsey Hurt (or from e-mail address 2024stavelynrcb@gmail.com), five of which attached numerous petitions. Among the petitions from Ms. Hurt were duplicates of the nine petitions received on June 17th.

16. NRCB Field Services has no explanation for the number 727.

D. ALLEGATION OF BIAS

17. Some RFRs refer to procedural fairness. A decision-maker whose decision is under review is permitted to respond to allegations of procedural unfairness.¹

¹ For e.g. see *Ontario (Children’s Lawyer) v Ontario (Information and Privacy Commissioner) [Goodis]* (2005), 75 OR (3d) 309 (ONCA) <<https://canlii.ca/t/1k5l8>> at para 34: “... a categorical rule denying standing if the attack asserts a denial of natural justice could deprive the court of vital submissions if the attack is based on alleged deficiencies in the structure or operation of the tribunal, since these are submissions that the tribunal is uniquely placed to make.” The Supreme Court of Canada quoted this paragraph as establishing the shift to a discretionary approach to involvement of the decision-maker in a

18. At the gatekeeping RFR stage, NRCB Field Services is reluctant to engage in these issues. However, a couple of RFRs allege “bias” on the part of the NRCB:
- a. Chelsey Hurt asks the Board to ensure “removal of bias in decision-making” (RFR #2, pdf p 10/10 no. 2 of second list); and
 - b. Greg & Sarah Olsen allege a failure on the part of the NRCB to “ensure an unbiased and comprehensive environmental assessment” and wonders if the NRCB’s review is “free from bias” (RFR #5, pdf p 7/8 under heading 3).
19. NRCB Field Services does not take such allegations lightly. There is no basis for these allegations and no evidence to support them. If the Board schedules a Review on the issue of alleged bias, NRCB Field Services will engage fully in a defence.

E. PINPOINTS IN DECISION DOCUMENTS

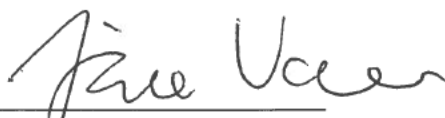
20. Under section 25(1) of AOPA, the Board is required, within 10 working days, to determine whether to schedule a review. Given the length of the decision documents, NRCB Field Services aims to assist the Board in pointing to information that relates to wetlands and riparian areas, and to water table.
21. The Approval Officer discusses wetlands and riparian areas here:
- a. Technical Document LA23050 at p 5² (site plan);
 - b. Decision Summary LA23050 at part 1.a., p 2;
 - c. Decision Summary LA23050 at Appendix A, p 11 (under discussion of MDP section 9.2(f));
 - d. Decision Summary LA23050 at part 6, p 4;
 - e. Decision Summary LA23050 at Appendix C, pp 33-34 (under “Contamination of water”).
22. The Board will find information related to water table in these places in the decision documents:
- a. Approval LA23050 at conditions 5 and 27;

review, in the more recent *Ontario (Energy Board) v Ontario Power Generation Inc.*, 2015 SCC 44 <<https://canlii.ca/t/qlb07>> at para 47.

² Also referenced by the M.D. of Willow Creek in their RFR. The page numbers of the Technical Document and the Decision Summary match the pdf page numbers.

- b. Technical Document LA23050 at pp 8-10 of 68 (general environmental information for facilities);
- c. Technical Document LA23050 at p 23 of 68 (water table condition for the in-barn pits); and p 40 of 68 (water table condition for the solid manure storage pad);
- d. Technical Document LA23050 at p 43 of 68 (relating to boreholes BH101, BH105, BH107, and BH109, excerpted from engineering report);
- e. Technical Document LA23050 at pp 19 and 47 of 68 (showing location of boreholes, from engineering report);
- f. Technical Document LA23050 at pp 52-62 of 68 (borehole logs for BH101 through BH111, from engineering report);
- g. Decision Summary LA23050 at section 8, p 6 (artesian flow conditions at the site, under "Environmental risk of CFO facilities");
- h. Decision Summary LA23050 at Appendix A, pp 10-11 (under discussion of MDP section 9.2(b));
- i. Decision Summary LA23050 at Appendix C, pp 33-34 (under "Contamination of water"); and
- j. Decision Summary LA23050 at Appendix E, p 50 (under "Construction above the water table").

RESPECTFULLY SUBMITTED THIS 19TH DAY OF FEBRUARY, 2025.



Fiona N. Vance
Chief Legal Officer – Operations
NRCB

Kelsey Peddle Approval Officer

June 10, 2024

Ag. Centre 100, 5401 1 Ave. S. Lethbridge Alta. T 1 J 4 V 6

From: Terry L. Olsen N. E. 30-14-26-W4 Box 302 Stavely, Alta. T0L 1Z0

Email: [REDACTED]

Dear Kelsey Peddle,

Re: Letter regarding Ivy Ridge Colony Appl. LA23050. Section 31-14-26-W4 in M. D. of Willow Creek 26.

I am writing to protest this application. The proposal is to feed and sustain dairy and poultry with no hogs proposed at present. Also to sustain these animals, a labour force of people living at the location. My focus is on supply of water for everyone. I have lived at this location for 73 years and recorded the weather and have memory of what happens here. It is for most years a very semi arid area which was only native grassland prior to habitation. The supply from our watershed in the mountains and foothills is inconsistent at best and not guaranteed.

To get a minimally producing well for my son Greg Olsen's residence, we had to drill 3 wells, the 3rd one we had to seismic. We in our history have only dryland farmed and used water pumped for the cow herd every day and house water. We were able to water a garden but not any grass or trees got water. This is a very arid and hostile and hot area in summer. If this proposed operation has to drill wells to supply all of these animals and people the supply will not keep it all going. They as well as the surrounding people drawing from the aquifer will run out of all supply of water. This is irreversible. After the Fact Records will not help people with dry wells and no water. I would think that location of such an undertaking might be better served along a creek, small river, or lake. Not with standing is the effect to community and the people who live here. Water Supply is the key element, and there is not enough.

Respectfully Yours,

Terry L. Olsen

July 18, 2024

Chelsey Hurt
Directly Affected Party- Landowner of 30-14-26-W4
Stavely, AB, T0L 1Z0

TO: NRCB Officer Kelsey Peddle

Re: Application LA23050

As a directly affected party that was notified of application LA23050, I submit the following information to be considered when making a determination of whether to approve this:

- 1. Concerns about the Quasi-Judicial NRCB Mandate and Policies**
- 2. Request MDP Commercial Bylaws to be applied to this approval**
 - a. Is the proposed CFO consistent with MD of Willow Creek MDP?
- 3. Effects on the Community/Cumulative Effects**
 - a. AOPA Section 20(1)(b)(ix)
 - b. Alberta Environmental Protection and Enhancement Act Section 49(d)
- 4. Environmental Concerns**
 - a. Impact to Watershed
 - b. Proximity to known nests/dens of Protected Endangered Species
- 5. Impartiality of NRCB Approval Officer**
 - a. AOPA Approvals Operational Policy Section 3.3
 - b. NRCB Code of Conduct

Item 1: Concerns about the Quasi-Judicial NRCB Mandate and Policies

Upon the sudden notice of being alerted to this application, I began to spend considerable amounts of time reviewing the NRCB mandate and policies, previous CFO applications, board reviews, legal opinions, municipal recommendations, acts and laws, and spoke with many individuals impacted by NRCB decisions, after which I came to the conclusion that the concerning policies and practices of the NRCB need to be brought to the public's attention.

I realize that these concerns go beyond this application but my purpose in writing this is to enlighten the hundreds of people impacted by this particular application and the thousands of people who have been or will be impacted by future applications. My intention is to ensure that a collective voice may rise up and be heard by the politicians who have either been ignorant to the NRCB policies or worse yet willfully have chosen to support the backwardness of this Board over their own constituents concerns. We only had 20 days to educate our community so in sharing these concerns my hope is that communities and landowners may never again have to fight with both hands tied behind their back for straightforward common-sense rights that have been outright ignored by the NRCB. We have long been stewards of this land- we have lived experiences that should be weighted in the same vein as a technical specification.

Our concerns with the NRCB mandate for confined feedlot operation (CFO) approval processes are as follows:

APPENDIX "B"

Lack of Public Interest being considered in the Approval Process

How is public interest defined and determined by the NRCB? The NRCB has presumed that approvals are in the best interests of the public so long as they meet technical requirements. However, this is a standard that the board developed, along with the NRCB Policy Advisory Group (PAG). NRCB policies have no consideration for public interest criteria that the public stakeholders have been able to help craft and define and technical requirements certainly aren't what the public is going to speak to as defining their best interest.

I wanted to know who is representing the public interest on the NRCB Policy Advisory Group (PAG). It was challenging to locate the PAG membership composition since there was nothing listed publicly on the NRCB website, but I was ultimately able to locate a report with their names and positions. For those external to NRCB reading this, the membership consists of:

Co-Chairs (2)	NRCB CEO Executive Director, Natural Resource Management Branch of AB, AFRED
Government (3)	NRCB Board Member Assistant Deputy Minister, Strategy and Governance Assistant Deputy Minister, Regulatory Assurance
Agricultural Industry (13)	General Manager, AB Beef Producers Representative of AB Beef Producers President and CEO, AB Cattle Feeders Association Director, AB Cattle Feeders Association Chair, Intensive Livestock Working Group Executive Director, Intensive Livestock Working Group Director, AB Milk 2 nd Director, AB Milk Vice Chair, AB Pork Executive Director, AB Pork Chair, AB Chicken Producers Vice Chair, AB Chicken Producers Director, Egg Farmers of Alberta
Municipal (3)	Director, Rural Municipalities of AB 2 nd Director, Rural Municipalities of AB Director, Alberta Municipalities (Urban)
Environmental NGO (2)	Representative, Southern Alberta Group for the Environment Representative, Rural Agriculture

In looking at this list of members, I believe there to be a significant imbalance of individuals, who according to the minutes of the [June 7, 2022 NRCB Accountability Session Report](#), put forward concerns that are representative of me and the over 700 individuals who signed a petition letter in opposition to the mandate of the NRCB and this particular application. Instead, the NRCB and industry members either commended themselves at how well they've hoodwinked the public or discussed how Rural municipality's municipal development plans (MDPs) are making it more difficult for their interests to be maintained. Given that the NRCB selected quotes to include in the report, they clearly endorsed the following comment by including it in the report:

APPENDIX "B"

PAG members expressed support for AOPA as it currently exists and were of the opinion that the legislation does not need to be opened or amended at this time. *“PAG has been so effective in recognizing and adapting its consensus process to accommodate change, that any consideration of an AOPA legislative review at this time would be considered superfluous.”* Intensive Livestock Working Group

To be explicitly clear I interpreted this individual as saying that he believes the public's consideration is superfluous because there have in fact been concerns raised about the AOPA legislation since its enactment, such as the lack of reflection of the public's interests in the legislation. The flaw in the logic of the NRCB is that they don't believe the AOPA has limitations. Law reviews conducted have indicated that the AOPA issues include:

- Limited Enforcement and Monitoring
 - Most enforcement and monitoring is done by the public alerting NRCB to issues and not the NRCB proactively completing this in a rigorous manner.
- Assumes that the AOPA is the source of the representative and current evidence, knowledge, and guidelines to adequately protect the environment and public health from the impacts of intensive agricultural operations.
- AOPA doesn't reflect adaptive changes to agricultural practices, technologies, and environment conditions which results in regulations that are ineffective because they are dated.
- Conflicts or inconsistencies between AOPA and other relevant legislation, for example:
 - Environment protect legislation that safeguards air, water, and land resources;
 - Water management and conservation laws, such as the Water Act and Water Resources Act;
 - Municipal and Regional Planning
- Lastly the AOPA is subjected to industry influence. Industry shaped the AOPA and prioritized their own interests over the environment and public health concerns. The AOPA lacks provisions for meaningful community input and transparency in decision-making processes.

So, I will keep asking- who is representing the public at the NRCB because it's not the NRCB nor is it the members of the PAG with the exception of the Municipal Members? If the definition by which NRCB considers and makes approval decisions to be technical specs, then the public interest factor has already been determined before anyone from the public even gets a say in the decision. The NRCB approval officer helps applicants to complete their applications so that they meet the specs. Only approving based on technical specifications leaves directly affected parties (DAP) with no guidance as to what argument they can take that will push the threshold to the state of denial of ill-advised applications. Board members are appointed because they have technical expertise not because they are experts in public policy.

When the NRCB states they don't have jurisdiction to consider most of the concerns of DAP, yet this is the only avenue for DAP to make such concerns, given the lack of the municipal role, then who do we raise policy issues with that will actually listen before a decision is made? The NRCB lacks transparency in the decision-making process beyond its technical specifications and there is no forum for the public to attend to raise broad policy issues. The Rural Municipalities of Alberta (RMA)

who do have a voice at the NRCB and with government, often have their concerns go unheard, as seen by the RMS resolutions pertaining to the NRCB and quasi-judicial boards that remain unsatisfactory. Therefore, this too is not a group that the public can go to, to speak on our behalf.

F. Saville & R.A. Neufeld (1991) wrote around the time the NRCB was formed that *“In the absence of a clear statutory purpose, [the NRCB] will be given broad approval powers, with a virtual blank cheque to develop a structure for forming value judgements on whether a project can proceed”*.

33 years later the NRCB is still cashing in on having unchecked power and developing their own judgements that frankly don't match to the public's values. I imagine that they have had such a long run because until an NRCB CFO application affects one personally, the public doesn't know that this board exists, how they operate, and the unchecked power they hold. Public awareness is exactly what I hope to improve upon with this letter.

To this end we collectively request that the Government of Alberta heed the request as part of the [RMA resolution 6-22S](#) to engage public stakeholders to develop a public interest framework to assess decision-making and engagement processes for the NRCB.

NRCB Operational Policies

Directly Affected Parties/Minimum Distance Setbacks/Nuisances

I question how the NRCB has defined who they consider to be a directly affected party (DAP), since the NRCB has such a narrow definition of this based upon distance. I wondered if the NRCB had ever granted someone DAP status on a basis not associated with a minimum distance setback (MDS), and in reviewing 10 years of documentation on the website, the answer is No. Why then would one even attempt to try to gain DAP status if the NRCB has made it impossible to put forward a response that isn't correlated with distance, and yet I daresay as you'll read later in my section on Community Impact, that distance is but only one factor that determines impact and effect. The MDS that the NRCB goes by was established in 2006- 18 years ago, so clearly the NRCB picks and chooses policies to update based upon what will best benefit them and their industry advisors.

The NRCB routinely in all responses summarily dismisses legitimate nuisance concerns from DAP and proclaim their superior mitigation strategies are in place. I found most responses to DAPs to be repetitive, cut and paste jobs such as *“the frequency of these nuisance exposures will normally be limited and of short duration”* or *“odors may occur 1-2 times per year”*. These standard responses directly contradict the 757 odour complaints that occurred in 2022-2023 according to the NRCB annual report.

In review of board decisions, I find the language and by extension I surmise the attitude of the board to be condescending to individuals who put forward concerns about nuisances. For example the board wrote in one review *“infrequency and short duration of manure spreading impacts to a level the Board finds **trivial**”*. How does the board know how often, when, where, and amount of manure will be spread for them to know that odors will be of short duration? Curious to know how many board members voluntarily have chosen to live next to a CFO and if they think nuisances only occur a couple of times a year and are “trivial”.

Lastly what makes the situation uniquely challenging for DAP is that we only have 20 days to research and find evidence to support that effects would probably occur, even though the applicant is given months to submit their full application. We have to carve off time to undertake something that we know little about in order to put up even a small fight against the proposals (of which 99% of approved too by the way). It's very curious that the notice came to us while in the middle of seeding. Was it thought that we would be too busy to pay attention to this and respond? How many notices go out during harvest too? I'm sure it's all just coincidence.

Lack of consideration of water resources prior to application approval

When water license approval granted at the same time as the NRCB CFO approval was discontinued in 2005, it was due to industry concerns regarding the length of time required to obtain a water license. The NRCB PAG has ensured that this decision be upheld for almost two decades. I ask:

- How was the public interests and concerns represented in this decision? How are we represented today in continuing this policy? Taking a longer review, in light of the water resource issues, should be the policy- not the opposite.
- Why does the NRCB/PAG believe that water resources shouldn't be considered and determined at the same time as their approval?
- How does the NRCB/PAG represent local small farmers who will be impacted greater by water utilization and quality issues?
- How has the GoA, as written in their response to [RMA Resolution 7-11S](#), upheld their commitment to *"review our processes to ensure they are meeting the needs of Albertans and remain true to our objectives?"*

If the AOPA 20(1)(b)(vi) states that they NRCB approval officer must consider the CFO's effects on the environment, the economy and the community and the appropriate use of land, why then does effects of the environment i.e. the impact to the watershed get deferred in consideration until after the fact by Alberta Environment that oversees the Water Act? Similarly for effects on the community, why would the effects only be considered in mitigation strategies to be deployed after the decision has been approved and the CFO developed.

The July 2024 release of the [Auditor General report on the Water Management system](#) under the Ministry of Environment and Protected Area from January 2019 to November 2022 found that the department lacks effective processes to manage surface water allocation and use and public reporting on surface water and the outcomes of surface water management is lacking. The A.G. stated in the report that Alberta:

- has no water conservation objectives in most basins
- does not know if existing water conservation objectives are working
- lacks robust processes to monitor water presses, assess risks, and decide when water conservation objectives are needed; and
- has ineffective processes to approve licenses and monitor compliance, such as not enforcing licensee compliance with conditions.

I implore the NRCB and EPA to put a moratorium on all approvals until all deficiencies found through the A.G. audit are addressed.

Approval of Intensive Commercial Feedlot Operations

How does one define generally accepted agricultural practices? The legislation doesn't discern between traditional small-scale family farming practices vs. intensive commercial farming practices. I daresay that the number of small-scale farmers, while likely to become a thing of the past due to the economic challenges wrought by intensive CFO's such as Hutterite colonies, are still greater in numbers than Hutterite CFOs. CFO approvals for intensive commercial feedlot operations should have more rigor to them, beyond technical requirements, such as I don't know, maybe water?

I also find it interesting that the NRCB clings to the disillusion that Hutterite Colony applications for new CFO's are only for a CFO and not also for the colony. I understand that the NRCB only approves the application in front of them, and not possible future growth and instead leaves Colony development to the MD but the MD is precisely the very stakeholder who could actually review both the feedlot component and the development component at the same time, as well as having significant insight into watershed supply and management issues occurring locally. It's disturbing that the NRCB has crafted policy that works in their interests only- i.e. hiding behind red tape reduction. Can the NRCB state with a straight face to the thousands of impacted individuals that when a Hutterite Brethren requests a new CFO that they honestly don't know or don't care enough that the Colony is coming next and then the multiple immediate future expansions of their CFO?

By using the NRCB CFO Search function I was able to compile data that shows that since 2014, a141 Hutterite Brethren's have made approval applications to the NRCB. These colonies collectively have then requested expansions requiring NRCB approval a further 138 times to increase the size of the feedlots. The average number of years between expansions is 6.5 years. This makes perfect sense that they expand- they are a commercial operation after all but also because when they submit the barn sizes and the livestock numbers initially there is an identifiable trend that occurs and to their benefit.

1. Submit to the NRCB the lowest possible number of livestock for an approval application despite the proposed barns being able to hold a significantly larger number.
 - a. By submitting a lower number, hopefully this won't set off too many alarm bells to the public.
2. Once the NRCB approves the application, and possibly once the feedlot is starting to get built, submit a development proposal to the MD to build the colony. By starting the feedlot build, it forces the MDs hand.
3. If the MD rejects the colony development, appeal to the Land & Property Rights Tribunal and have them overrule the MD.
4. Build the colony and then once on it, request the 1st livestock expansion that will fill the barn.
5. Keep filling the barns and then in a few years' time, request to build more barns and expand again.

You are all educated people- let's stop pretending that you don't know what's going to happen with these applications. As a facilitator to this occurring, how are you living up to your mandate "Balanced decision making in the public interest"? Awful lot of things to consider when making a

balanced decision, when only one NRCB approval officer holds all the power to approve a large scale operation too.

Using other approved CFO barn sizes and livestock numbers as a proxy for this application, I found that the number of livestock that could be expanded to is in the hundreds of thousands. I am under no illusion that it won't be if approved.

I implore the NRCB, as a start, to consider the inclusion in applications of the calculation based on industry standards, of what the maximum capacity of the proposed barns and feedlots could be. By doing so, this improves transparency of the proposed operator, and ensures that the public can fully be aware of the scale of the operation.

Concerns about lack of Rural Municipality being a Decision-Maker

MDs are legally responsible for land use planning, infrastructure management, long-term liability, infrastructure strain, and municipal governance. As elected members that represent their constituents, MD councilors are positioned to understand their local resources, culture, values, and community. After reading through the [The Rural Municipalities of Alberta released a report on quasi-judicial agencies in November 2023](#) which you are likely familiar with, I must say that what I've heard after three community meetings/townhalls is accurately reflected in this report. The lack of including the MD in decision-making (please don't patronize and say that the MD has a voice as a DAP- I'm a DAP too, that doesn't make me a decision-maker does it?) indicates that the NRCB does not respect nor value the important role of municipalities.

I also want to state that using the MD's MDP as a proxy for implicit approval is flawed, given that it's not reasonable to expect that the MD to categorize every section of land for suitability of development? The role of the MD needs to be recognized and expanded but given the advancement of Bill 20 I don't have confidence that this government will consider this, despite I repeat again the over 700 individuals opposed to just this application alone.

Item 2: Request MDP Commercial Bylaws to be applied to this approval

- NRCB Fact Sheet "*The Permitting Process for Confined Feeding Operations in Alberta*" states that CFO's may be family-run or commercial operations.
- In the decisions of multiple Supreme Court of Canada cases involving Hutterian Brethren's, the Supreme Court definitively wrote into their decisions that they consider Hutterian Brethren's to be commercial operations.
 - [Alberta v. Hutterian Brethren of Wilson Colony - SCC Cases \(scc-csc.ca\)](#)
 - Midland Hutterian Brethren v. Canada [2000] [Midland Hutterian Brethren v. Canada, \[2000\] GSTC 109 \(FCA\) | Tax Interpretations](#)
- The Canada Revenue Agency also indicates that Hutterian Brethren's are commercial operations.
 - [Income Tax Folio S4-F11-C1, Meaning of Farming and Farming Business - Canada.ca](#)
- Neither the MD of Willow Creek Municipal Development Plan (MDP) nor the South Saskatchewan Regional Development Plan (SSDP) define Agricultural vs. Commercial, therefore without this definition as part of these plans, I compel the NRCB to consider the

APPENDIX "B"

Ivy Ridge Colony as a Commercial Operation as the Supreme Court of Canada already does.

- Can you please answer why you are not following Supreme Court established case law in which they recognize Hutterite Colonies and their associated CFO's to be commercial organizations, when making this decision?
- The MD of Willow Creek MDP applicable Section 3 Policies that the NRCB should therefore consider are:
 - **3.2** The MD shall require single industrial and commercial subdivisions and developments to obtain access to water, fire suppression, and emergency services.
 - **3.4** The approval of industrial or commercial development may require the developer to enter into an agreement with the MD regarding the construction of roads, accesses, utilities, or other servicing, which the MD may require.
 - **3.6** The following shall be considered when locating industrial and commercial development in the MD:
 - **a.** the compatibility of the proposed development with existing uses in the surrounding area;
 - **b.** the presence of natural landscape features that may be impacted by the proposed development;
 - **c.** the impact on MD emergency services;
 - **d.** the impact on agricultural operations in the area;
 - **e.** the impact on local roads and the provincial highway network.
 - **3.12** Commercial or industrial subdivisions and development shall occur in suitable locations and in a manner that allows for the planned expansion of local roads or provincial highways.
 - **3.14** The MD shall consult with provincial and local transportation authorities when evaluating proposed commercial and industrial land use designations, in the vicinity of local roads and provincial highways, which may be affected by the proposed development.
- The MD of Willow Creek to date has not been contacted by the applicants of the proposed CFO commercial development to discuss Policy 3.6 considerations as I was informed at the MD of Willow Creek Municipal Planning Committee Meeting dated June 12, 2024.
- Breaking each point of this section down further, the NRCB should consider:
 - the compatibility of the proposed development with existing uses in the surrounding area;
 - The location is pastoral. Small-scale family-run agricultural operations surround the location. Agricultural nuisances associated with small-scale family-run agricultural operations are accepted by surrounding landowners and community members. Commercial operations do not exist within the surrounding area. This CFO would be an extreme outlier and not compatible with existing uses in the surrounding area.
 - Can you please answer how this proposed commercial development is compatible with the surrounding area, when making this decision?
 - the presence of natural landscape features that may be impacted by the proposed development;
 - The proposed CFO is to be located in a grassland area of the MD. Surrounding this location are wetlands and native grasslands that are home to endangered species. The Foothills are seen to the West. There are no

APPENDIX "B"

obtrusive developments that interrupt the eye, or the natural landscape and local farmers know where dens/nests are so as not to disturb them or their habitat.

- Can you please answer how the natural landscape features will not be impacted by this proposed commercial development, when making this decision?
- the impact on MD emergency services;
 - The Rural Municipalities of Alberta Resolution 1-24S, dated April 1, 2024 identified that there are declining fire department services across Rural Alberta. They stated they are struggling to recruit and retain volunteer firefighters.
 - This issue is occurring at the same time that Govt. of Alberta has recognized the province is struggling to control an increasing number of wildfires hence increasing the emergency funding for wildfires.
 - In speaking with members of the Stavelly volunteer firefighters, they are increasingly called out to provide services beyond a typical radius of Stavelly and area due to the lack of available firefighters.
 - Can you please answer how the impact and availability of this vital resource is being taken into account when making this decision?
- the impact on agricultural operations in the area;
 - Will speak to this in Item 3- Effects on the Community.
- the impact on local roads and the provincial highway network.
 - Highway 529 is a major throughput road for people travelling to camp at Twin Valley Reservoir, Clear Lake, and Little Bow Provincial Park. It is a road filled with families and travel trailers, as well as school buses.
 - Highway 529 and Range Road 270 which is indicated as the RR that an access point to the CFO will be built on, does not have shoulders, turning lanes, or acceleration or deceleration lanes.
 - This CFO will exponentially increase the volume of tractor-trailers using Highway 529. The intersection of Highway 529 and Highway 23 is already a known intersection of numerous fatal traffic accidents.
 - The application's site plan indicates that the manure storage will be located less than 600 meters from the corner of the intersection of Highway 529 and Range Road 265. Current Alberta Transportation policy requires a permit for any roadside development within a "development control zone," under the Alberta Highways Development and Protection Act which is 800 meters of the centerline of a highway and public road intersection. This setback is to ensure safety of people travelling this road, as development within the exclusion zone creates visibility issues.
 - Can you please answer what transportation impact assessment has been conducted that shows that the increased risk and safety to families, children, and local community members is acceptable to the decision-makers if this CFO is built?
 - Can you please address how the discrepancies of this site plan will be addressed per the Alberta Highways Development and Protection Act, with protection as the operative word?

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- The Alberta Municipal Government Act section 617 states there is a requirement “to maintain and improve the quality of the physical environment within which patterns of human settlement are situated in Alberta, without infringing on the rights of individuals for any public interest except to the extent that is necessary for the overall greater public interest”
 - I implore the NRCB officer to consider this proposed commercial CFO in the context of how it meets Section 617- this will not be an improvement to the quality of the physical environment nor is it in the overall greater public interest as demonstrated by the hundreds of individuals who signed the petition letter opposing this application.
 - Can you please answer how you are considering AMG Act Section 617 when making this decision, and how this is in the greater public interest of which so many individuals are opposed?

Item 3: Effects on the Community/Cumulative Effects

The most significant negative impacts to the community if this CFO were to be approved that I will speak to, in no particular order are economic development, community decline, environmental impact, loss of local culture and knowledge, loss of local industry, economic concentration, social inequality, and the determinants of health.

Economic Displacement

- Small farming operations cannot compete with economies of scale that commercial operations enjoy, leading to financial instability and often is a perpetuating cycle in which they will be forced to sell to the very ones that displaced them.
- To stay competitive, small farmers often take on significant debt as they are not in a position to benefit from economies of scale nor do they base their model on the principles of this, despite economic pressures to do so.
- Hutterian Brethan’s do not employ local workers and are in a position to offer services such as welding and fabricating at a reduced rate due to economies of scale, which can result in job loss for community members.

Community Decline

- As small farms close and people move away, local businesses, schools, community organizations may struggle or close due to a declining population, further eroding the community fabric.
- As people move away, community fragmentation and social ties will weaken and community institutions such as service clubs are at risk of closure.

Environmental Impact

- Commercial operations employ intensive practices that can lead to soil degradation, water pollution, and loss of biodiversity, reducing the sustainability of the land.
- Water scarcity due to overuse of water resources is a significant challenge in Alberta, further challenging the viability of small-scale farmers in the area.

Loss of Local Culture and Knowledge

- Loss of a cultural heritage of rich traditions and local knowledge about sustainable farming practices when small-scale farmers are no longer able to operate.

Economic Concentration

- The concentration of production in the hands of fewer corporations means they reduce the market competition; thus they drive down the prices smaller farming operations can receive for their products and limit access.

Social Inequality

- The wealth generated by large commercial operations does not stay in the local community. Due to the taxation system that Hutterite Brethans enjoy, there will not be a significant income increase from the MD to the community of Staveland.

Determinants of Health

In consideration of all of the above significant impacts that are likely to occur to Staveland community members, the approval of this CFO will also have multifaceted impacts on the [determinants of health](#), including:

- **Economic Stability**
 - a. **Job Loss**- Any closures of local businesses leads to unemployment which reduces household incomes and increases financial stress.
- **Social and Community Context**
 - a. **Social Isolation**- Declining populations can lead to a breakdown in community networks and social support systems, increasing loneliness and impacting physical health.
 - b. **Community Cohesion**- The sense of community can weaken as people move away in search of better opportunities, reducing collective efficacy and social capital.
- **Neighborhood and Physical Environment**
 - a. **Infrastructure Decay**- Reduced tax revenues from a declining population can lead to neglected infrastructure, such as roads, parks, and public services, negatively impacting physical activity and safety.
- **Education**
 - a. **School Closures**- As families move away and enrollment drops, local schools may close or consolidate reducing access to quality education and after-school programs. This is already occurring in Staveland with the loss of a teacher and consolidation of classes.
 - b. **Educational Attainment**- Lower educational opportunities can limit future employment prospects and perpetuate the cycle of poverty.
- **Health and Healthcare Services**
 - a. **Healthcare Access**- Declining populations may lead to limitations on access to healthcare and emergency services i.e. lack of volunteer firefighters, lack of social network to drive people to appointments.
 - b. **Health Behaviors**- Economic stress and limited resources can lead to unhealthy behaviors such as substance abuse and poor diet.
- **Food Security**
 - a. If the population declines, then there could be a loss of local businesses such as the Staveland Grocery Store. The loss of this creates a food desert, where residents, particularly those impacted by mobility, have limited access to nutritious food.

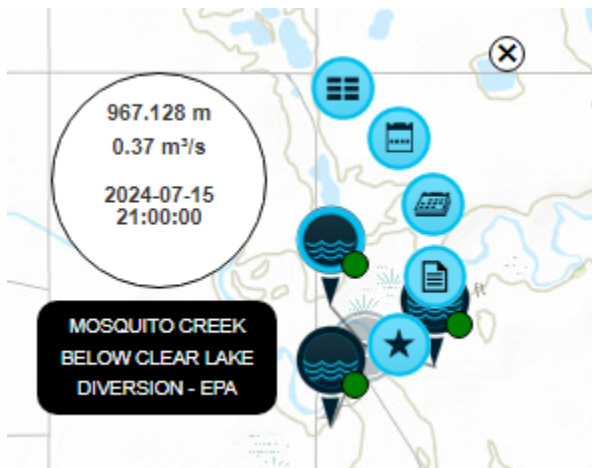
- **Environmental Quality**
 - a. **Pollution**- The commercial activities will increase environmental pollution, affecting air quality, which is associated with known health issues such as respiratory diseases and cancer.
 - b. **Land Use**- Neglected and abandoned land and property can become overgrown and contribute to issues such as vector-borne diseases.

- The cumulative effects of these impacts on the determinants of health can result in a vicious cycle of declining health outcomes, making it increasingly difficult for the community to recover and thrive.
- Small farming towns such as Stavely, will be susceptible to decline if this proposed commercial CFO is approved due to a combination of economic, social, and environmental factors.
 - Can you please address how the effects on the community are being considered and not summarily dismissed because it's "outside the scope" of the Approval Officer?
 - If not being addressed, can you please explain how human health, social, physical impacts can be ignored when making this decision, despite our right to protection of basic human rights under the Charter of Rights and Freedoms, federally and provincially?
- Regarding NRCB Approvals Operational Guide Policy #9.11 Cumulative Effects, if the NRCB Board has instructed Approval Officer's to not consider cumulative effects, who is considering this then?
 - Can you please answer this question?
- While AOPA may not use the term "cumulative effects", the Alberta Environmental Protection and Enhancement Act (AEPEA) does under Section 49(d) and given that the NRCB reports to the Minister of Environment and Protected Areas I question how the NRCB Board can summarily dismiss this consideration.
 - Can you please answer this question?
- The AEPEA states that in Section 2 Purpose of the Act that the principle of sustainable development, which ensures that the use of resources and the environment today, does not impair prospects for their use by future generations.
 - Can you please explain how the NRCB considers this piece of legislation afforded to all Albertan's and how you are considering the impacts for future generations, and in particular water?
 - Can you please explain how the NRCB considers that the AEPEA is outside the mandate and scope of legislation that they must consider when making an approval decision, given NRCB reports to this Ministry but that also the AEPEA Schedule of Activities (5)(n) states "designated livestock operations" as an activity that is defined under this Act?
- According to the joint EUB, Alberta Environment, and NRCB Publication titled "[Cumulative Effects Assessment in Environmental Impact Assessment Reports Required under the Alberta Environmental Protection and Enhancement Act](#)", it defines cumulative effects as "*the changes to the environment caused by an activity in combination with other past, present, and reasonably foreseeable human activities*".

- It further states “*It might appear simpler to avoid uncertainty by including only those projects and activities known with certainty. However, such seemingly more solid predictions almost certainly underestimate cumulative effects by neglecting the current understanding of what is reasonably foreseeable. Predictions of this kind are of limited value in the exploration of potential cumulative effects because they anticipate the lower bounds of plausible future conditions*”.
- “*The regulatory agencies appreciate the inherent uncertainties of predicting future developments. They also realize that the proponent compiling the CEA will not be responsible for many of the future activities and their impacts. Nonetheless, the agencies believe that potential future activities can be compiled and analyzed. Cumulative effects scenarios can be based on current knowledge and an analysis of factors affecting development in the region. Proponents should consult with adjacent industrial operators and incorporate information about their anticipated growth into their CEAs. A reasonable attempt to gather information must be demonstrated.*”
 - Can you please identify what actions were/have been undertaken to identify the foreseeable cumulative effects that will harm the environment and the community, which is based on an analysis of all factors?

Item 4: Environmental Concerns

- As of July 15, the [Alberta Govt. River Basins](#) site indicates the flow rate for Mosquito Creek is 0.37 cubic meters.



- The minimum operating flow per the Water Act for Diversion purposes is 0.283 cubic meters. This indicates that the Mosquito Creek is dangerously low, and this is before a CFO and Colony is impacting it. I was informed that restrictions are in place through the Water Act so that diversion of water can't occur when creek levels typically drop below 5 gallons per flow rate, which is typically July onwards.
- Given that this colony has stated they will be drawing water from Mosquito Creek exclusively to support the feedlot, the concern is since water diversion is limited to April to September (and possibly only April-June) they will be drawing a tremendous amount of water in a short timeframe to fill their reservoirs, negatively affecting other water right holders.

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- The applicants current license is for irrigation pivots, and I am concerned that monitoring of how the water is utilized won't be thoroughly conducted and they will draw water for both purposes. **Can you please contact EPA for how they plan to conduct utilization monitoring initiatives?**
- Please note that the applicants wrote on Page 7/43, that the depth to the water table is 2.01 meters. Yet on page 19/43 they state that the depth below ground level for the Dairy barn will be 3.7 meters. **Can you please explain how this will be addressed?**
 - While above 2.01 meters, the compacted soil liner under the manure storage pad is listed as being 1.01 meters deep. 1 meter = 3.3 feet. I am concerned that there is too great of risk of water contamination when only 3 feet separate the water to my family's livelihood, wellbeing and health and the bottom of the manure liner.
- In 2012 a groundwater supply and demand audit was commissioned by the Highwood Management Plan Public Advisory Committee and conducted by AMEC Environment & Infrastructure to identify groundwater characteristics of the little bow watershed, and to discuss impacts of increased groundwater use in the future, amongst other objectives. A longtime member of the Mosquito Creek Water Council who is a local expert in this water source provided the following findings:
 - As illustrated in the groundwater study, the area of this proposal is in a shallow ground water area, in close proximity to landowners water wells, and close to Mosquito Creek, Twin Valley Reservoir, Clear Lake Canal, and Clear Lake.
 - At the very least affected landowners should request a liquid and solid water management plan in order to satisfy proper disposal of all waste materials that could have potential adverse effects to the existing landowner water wells, and nearby surface water, since protection of quality and quantity of available ground and surface water is paramount in this sensitive area.
- It would be extremely concerning and detrimental if the NRCB rules to allow a CFO to be built that at first blush with publicly available data and reports on water indicates it is wholly unsuitable for the area and unable to be supported by its limited water source.
- To understand the impact that this could potentially have on affected landowners and the broader community, if this technology is available to Government, I kindly request that those empowered to do so within the Department of Water Resources, involve the use of a simulator to model what the likely outcome would be on water supply should this proposal be approved. This would better inform everyone what the effects would be over a future time frame, to ensure that sustainable development and allocation of water resources is guaranteed.
 - While I understand that the NRCB can't comment on future proposals, as mentioned in Item 1, future expansion of livestock should be considered in all applications and the impact on the watershed because as demonstrated using the NRCB's available data online, initial livestock numbers in almost every approval have tripled and quadrupled in expanded approvals.
 - If a simulator was available, because we already know that this will be a colony and barn sizes being built today indicate that poultry counts can be expanded to approximately 140,000 to 200,000, the simulator should account for this highly likely growth and water utilization.
- I would also like to bring to the attention of the NRCB that they should consider the nearby wetland on my quarter section and the nests/dens of endangered birds in the area.

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- I have grown up knowing and occasionally witnessing the burrowing owl and ferruginous hawks that nest on my land and in adjacent lands. Using the AB Govt. landscape analysis tool confirmed that this area as well as the point of diversion from Mosquito Creek is considered to be a Key Wildlife Diversity Habitat. Unfortunately, in speaking with a Fish & Game Officer my understanding is that Prohibitions and Acts protect the species but not the habitat; habitat destruction is managed after the fact if a den/nest has been disturbed.
 - I do request that environmental considerations under the Wildlife Act be considered prior to an approval. **Can this be completed?**
 - I am concerned that there are no legally enforceable setbacks for endangered species, and that the increase in traffic will have implications for the hawk, as well as development will have implications for the burrowing owl habitats that exist in the area.

Item 5: Impartiality of NRCB Approval Officer

- Terry Olsen invited Kelsey Peddle to attend a townhall information session in Stavelly on June 5th, which she declined.
- Terry Olsen, Greg Olsen, David Olsen, and Ryan Flitton met with the Ivy Ridge Colony Boss/Rep Paul Wipf to discuss the proposed CFO and Paul asked this group if one of them was the one that called to talk to Kelsey and invite her to the Townhall. Terry responded affirmative and asked how Paul how he was aware of this.
- Paul informed the group that following her call with Terry she then called Paul and proceeded to inform him of and discuss with him the known opposition to this application. The fact that this call took place is concerning for a multitude of reasons:
 - The decision by NRCB Officer Peddle to immediately discuss opposition to the application speaks to her acting in a manner that potentially favors one of the parties before the outcome is made.
 - There is no AOPA nor NRCB operational policy that states an NRCB officer is to provide notification to any party when faced with opposition. Rather I believe the following policies state the opposite of what Officer Peddle chose to do:
 - AOPA Approvals Operational Policy Section 3.3 Impartiality states:
 - *The NRCB's code of conduct and professional standards of conduct govern approval officers. Consistent with the code of conduct, approval officers are expected to be impartial in their review of applications and all related documents, and to abide by the NRCB's core values of integrity, fairness, respect, excellence, and service.*
 - NRCB Code of Conduct states:
 - *NRCB Employees will perform their duties with integrity, impartiality, and objectivity.*
 - *Impartiality: When exercising regulatory, inspection, approval, or other discretionary authority over others, Employees must carry out their duties with impartiality at all times.*
- **Definitions of Impartiality:** *"decisions should not be made on the basis of bias, prejudice, or preferring the benefit to one person over another for improper reasons. To maintain an unprejudiced view of all parties". "The notions of bias and conflict of interest, whether real or apparent, are of particular concern in all situations where the rights of individuals are being decided."*

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- I assert that through her actions, Office Peddle did not maintain an appearance of impartiality, which is necessary in order to maintain public confidence in the decision-making process.
- She made a preliminary judgement about a party (opposition/hostile) , which indicates she already formed an opinion about individuals/groups notified of this application, which indicates she has pre-judged the party. As a decision-maker she chose to discuss this case with the applicant in the absence of the other party, which also leads to an appearance of bias, and provided information to the applicant pre-emptively to which the absent party was not privy to be able to respond to.
 - Can you please describe why the actions to support one invested party over another were taken?
 - Can you please answer how this will be addressed?

Personal Impact Statement-

[Redacted]

*redacted on request of the respondent,
approval officer did not consider*

[Redacted]

[Redacted]

[REDACTED]

[REDACTED]

Conclusion of Issues

In summary this application must be denied for the multitude of reasons that I listed in my response.

Sincerely a Directly Affected Party representing the collective hundreds of unheard voices of all affected parties the NRCB blatantly ignores,

Chelsey Hurt

APPENDIX "C"

July 18, 2024
Bev Olsen
N. E. 30-14-26-W4
Stavelly, AB



Dear Kelsey Peddle,

I am writing to express my strong opposition to the proposed confined feedlot operation and associated Hutterite colony (Hutterian Brethren of Ivy Ridge application #LA23050, a daughter colony of Parkland Colony) that is planned near our family farm. This development poses significant risks to our community, environment, and local economy, and I urge the NRCB to not approve this proposal.

The introduction of a large-scale confined feedlot operation would drastically alter the cultural fabric of our community. There are concerns that these operations typically do not integrate into local educational and commercial frameworks, potentially disrupting our interconnected small family farms and community cohesion. Small family farms form the backbone of our community, not large scale commercial operations. Currently our Stavelly Elementary School is struggling financially due to a shortage of attendance, thus cutting one teacher (one of our best). They are combining one classroom into three grades with 30 to 35 students in each classroom. This feedlot and colony won't be contributing financially to the community, nor send children to the school. Families may move out of the area, creating a downward spiral impacting our school even more.

Economically, the introduction of such a feedlot operation could undercut local farms and businesses, creating unfair competition for essential resources like water and land. This imbalance could jeopardize the livelihoods of existing farmers and reduce the economic viability of our region as a whole. The anticipated increase in truck traffic, noise pollution, and odors would degrade our rural quality of life, making it less appealing for people to move to the area. Our community prides itself on neighborly cooperation and sustainable agricultural practices, values that industrial-scale ventures do not demonstrate.

Environmental impacts are equally troubling. Large feedlot operations are known contributors to water contamination through waste runoff, posing a serious threat to our local water sources and wildlife habitats. The ecological balance of our region, home to several vulnerable species, could be irreversibly harmed.

I am deeply concerned about the potential long-term consequences on our water supply, which is critical for both domestic use and local biodiversity. The proposed drilling of multiple wells raises significant apprehensions regarding water quality and availability for surrounding families. Our family has always been aware of a water shortage on our farm over the years, especially during the drought years. When our dugouts and sloughs were dry, we depended on our well water to accommodate our livestock. There were times we

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weren't able to do laundry even, for 6 growing children, or water our garden when the cattle were drinking. We had to haul water every day to supplement our well usage. It makes no sense that the NRCB policies can approve these CFO's in isolation, without definitively knowing if water is available. It makes even less sense that the NRCB, as a supposed balanced perspective board, doesn't inquire about water supply with local landowners nor care to take their water concerns into account when making decisions.

In conclusion, while we understand that change and development is necessary, it must not come at the expense of our community's well-being, environmental sustainability, or economic stability. The proposed confined feedlot operation and Hutterite colony present clear risks without evident benefits for our area.

I implore the NRCB to consider this proposal thoroughly, taking into account its potential adverse effects on our environment, economy, and community cohesion. As concerned citizens, we seek fair and balanced decision-making that considers the broader impacts on our region's natural and social landscape.

Thank you for your consideration of these concerns.

Sincerely,

Bev Olsen

APPENDIX "D"

David Olsen
Rent/Live at NE 30-14-26 W4
Stavely, AB T0L0V0



July 18, 2024

To Kelsey Peddle,

I am writing to strongly oppose the proposed application for the Ivy Ridge Colony east of Stavely, AB, which if approved will have significant and far-reaching consequences for our community and environment.

Ivy Ridge Colony's operations, characterized by their scale and industrial nature, pose a direct threat to our local economy and community fabric. These colonies operate with significant financial advantages, often sidestepping local businesses and taxation responsibilities. They undercut local equipment dealerships, grocery stores, and service groups, bypassing community engagement and contribution while burdening local infrastructure and services.

I have serious concerns about tax inequities associated with these colonies. They operate on a cash basis, avoiding equitable tax contributions that burden other local businesses and residents. This unfair advantage distorts local economic dynamics and stifles the growth opportunities of smaller, family-run farms and businesses. We all know that all the members of the colonies work within the colony but are exempt from income tax under communal principles. This exemption extends to the colony's economic activities, contributing to unfair competition with local businesses that do pay taxes. They benefit from lower operating costs, not paying minimum wage, many of them not having their kids in school past Grade 8 and instead making them work for a couple of dollars a month, and it undercuts surrounding local economy, and services and can put people out of business. Even the school in Stavely is harmed- they don't contribute fairly to the tax base to support school services, and they don't send their kids to the local school either.

The Ivy Ridge Colony will erode our community's social cohesion. These colonies don't integrate into our local schools, churches, or community events, further isolating themselves from the rest of the community. They benefit from public funded services like healthcare, but they don't contribute proportionately. Instead Stavely as it always has done, relies upon a small number of dedicated long-time community members to keep volunteer programs and events afloat. Sure, they've helped out some communities after significant natural disasters but I'm talking about the day to day community living that keeps communities alive and healthy. There is nothing healthy about a Hutterite Colony. They don't respect the land, they use outdated farming practices, they overutilize natural resources like water, they don't respect women, they put their children to work as soon as

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possible, they pay everyone essentially nothing but then tell the government that they all earned a living wage that was divided equitably. Only a few actually live well- the bosses. They drink a significant amount, don't educate them properly, and they teach their church sermons in a language that most don't even understand. Tell me what benefits does a colony have to any community?

Our region, already strained by persistent droughts over the past several years, faces critical challenges with water scarcity. Mosquito Creek and local groundwater sources are under severe stress, exacerbated by minimal rainfall and diminishing water availability. The approval of applications like Ivy Ridge Colony's disregards these realities and risks further depleting our precious water resources, essential not only for agriculture but for our basic household needs.

The environmental stewardship of colonies like Ivy Ridge raises serious concerns. Instances elsewhere from Colonies in Alberta have shown the inadequacy of manure containment and management, resulting in contamination of waterways and groundwater. Current setback regulations fail to adequately protect neighboring properties, threatening their land, homes, and environmental safety. And these are just the instances the public actually learned about or come to see. How many instances have occurred in which the Colony covered it up? The Auditor General doesn't trust the Water Regulators- so why should we?

There are 4 colonies in a 12 mile radius, and this will make it 5. Where will it end and who will stop them? How many are we going to have in 10 years? I doubt farmers like me and my family will even be able to stay afloat because they undercut us in every possible way. Concentration of feedlots has been demonstrated in the USA, with multiple lawsuits in which local communities members won, that they strain the environment, water, air, quality of life, etc. Why can't Ivy Ridge expand where they live right now?

The NRCB's outdated policies fail to account for the current environmental conditions and the long-term consequences of approving such industrial-scale operations. By prioritizing your own interests and propping up industry interests and economic gains over sustainable development and community well-being, these decisions jeopardize the future livability and prosperity of our region.

Someone with a backbone needs to start the tax reform that is needed for Hutterite Brethren's of Canada to level the playing field. Otherwise small scale farmers will be out of business. Communities will become ghost towns. The land ripped of its nutrients. Water dried up. Why doesn't the NRCB care? Are you that morally bankrupt?

David Olsen

Directly Affected Party to Application LA23050

APPENDIX "E"

Greg Olsen
Directly Affected Party
144084 Rge RD 265
Stavely, AB TOL 1Z0

July 18, 2024

“It is hard to imagine a more stupid or more dangerous way of making decisions than by putting those decisions in the hands of people who pay no price for being wrong” - Thomas Sowell

This is a submission to the Ivy Ridge colony application LA23050 to obtain approval for a CFO and really lets be frank- it's just the first part of an entire colony. I am in the radius of what the NRCB has considered as being directly affected.

Being directly affected for me denotes that I will have a harm or materially negative effect on my current living standard and that of my families. After careful review of NRCB approval policies, it seems that “passing the buck” or “not in my scope” seems to be standard operating procedure. There will be far reaching and lasting consequences, all of which as of this writing will be negative. My family will experience a degradation in quality of life and increase in suffering not limited to physical, mental, social, and existential.

Firstly the physical. Living within close proximity of manure storage, whoever deemed it acceptable to have the MDS at 500m obviously didn't have to live with the consequences of that chosen measurement. This does not take in account topography, prevailing winds and other environmental factors. Simplified down to an arbitrary distance that seems to satisfy all not affected. It's the same reason the colony is building housing on the west side, as the wind blows from the north, and southwest. Who in their right mind would willingly choose to live that close, and deem it tolerable?

Secondly the mental. At what time does one consider the suffering that will take place as well as frequency? These are realities already taking place across Alberta from other CFO's that were rubber stamped, or legacy, that are creating impacts on communities negatively. You are legitimizing long lasting effects on the community and surrounding area when you approve these.

Thirdly the social. Do you know anybody that wants to be around a large industrial feeding operation day-in, day-out? How about raise a family and enjoy nature? Build a life and home where ones goal is to leave this earth better than you found it? Surely you can't disagree that if being placed in my position you would be asking the same questions.

Lastly existential. With hyper focus on the environment, this will have multi-pronged implications that will not be managed properly. How does one know? Simple prior behavior dictates future behavior. CFO's are very well documented with having a whole host of problems from manure, disease, greenhouse gases, vermin, airborne particulate matter, water, community degradation. Perplexing that they are only addressed after the fact. Shouldn't the goal of the NRCB be to improve the wellbeing of the individuals and communities when considering such applications before the problems exist? The

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only group who stands to gain any benefit without sacrificing any quality of life or suffering is the applicant. I won't question fairness; however some measure of balance must be adhered to.

These farms are large scale industrial entities and must be treated as such. Integration and harmony within the community must be considered, since we live with the lasting consequences. To date no collaboration has taken place, in fact the opposite has been experienced that can only be summed up as malicious. Perhaps the applicant party was hoping the community wouldn't take notice?

In regard to the applicant party. One has to integrate with the community. There has been none, and they do not contribute to the local economy and utilize small business. They often bypass equipment dealers and go direct to manufacturer. They use economies of scale to price competitors, prospective buyers, and young farmers out of the markets. Schools and community service groups, the life blood of small rural farming communities, continue to sustain dwindling numbers as more people move away as they no longer can afford to live and or want to be near such operations. Local volunteer fire departments already taxed with low recruitment numbers and stunted resources cannot effectively manage more strain to their operating service commitments. It's blatantly obvious they have not taken into consideration the community and the negative effects with what they propose.

Not too long ago if asked what the NRCB was, I wouldn't have been able to answer correctly. I still have more questions than answers at this point. How does the magnitude of a cfo/colony have a little advert in the paper and given a mere 20 days to respond seem adequate? This has been identified as a common concern of not only your internal policy review members from the MD, but of other CFO complaints and concerns brought forward. This is not acceptable and shows how lax and outdated your policies are. Yet its business as usual for the NRCB. I thought we are supposed to progress as a society as time passes, yet the NRCB is status quo. It's as if the whole process is to benefit the applicants and the rest is somebody else's department or problem. From my perspective it's a viscous cycle of no accountability. Furthermore how is it the sole discretion of one person to approve or deny an application? With no repercussions for the approval officer I can't think of a worse operating guideline. What is stopping approval officers of being corrupted? Why is there no representation from the community that can assist in the decision making? I asked my local councilors why there needed, since the decisions are out of their hands. Wouldn't it be beneficial to have local representatives at the decision making table to properly address constituents concerns?

In conclusion, I have laid out only a fraction of my concerns and tried to convey my dismay, displeasure, bewilderment, and frustrations opposing this new colony and its CFO. I just ask- put you and your family in my position and ponder if this is what you would want your quality of life to be. The applicant is wanting me to have no benefits at all, while they enjoy all of them for themselves. Since I would be receiving no forms of compensation it's just a huge loss for me, my family, neighbors, residents of the community, and future generations.

Respectfully

Greg Olsen

Sarah Olsen
144084 Rge RD 265
Stavely, AB, T0L1Z0

July 18, 2024

Dear NRCB Approval Officer Kelsey Peddle,

I am writing to express my deep concern and strong opposition to the proposed feedlot operation that is set to be built East of Stavely. This project, as currently planned, poses significant threats to our environment, public health, water resources, and overall community well-being.

Water Resources and Quality: Our community relies heavily on clean and sustainable water sources for agricultural activities, domestic use, and maintaining the ecological balance of our local environment. The introduction of a feedlot operation will lead to increased water usage that is likely beyond the capacity available from mosquito creek and in a time of drought, unacceptable risk levels of contamination that could occur. Given the already limited availability of water in our region, this will strain local water reserves and threaten the quality of our drinking water and ecosystems. Approximately 10 years ago we drilled a well for water at our place, and there were multiple places they had to drill until they found water. Knowing that we have been under drought conditions for years since then water is even more of a concern.

Environment: Feedlot operations are known for their potential to generate air and water pollution. The emissions of ammonia, methane, and other volatile organic compounds (VOCs) degrade air quality, leading to respiratory issues and other health concerns among residents. Additionally, improper management of waste can result in soil contamination and contribute to water pollution, impacting local wildlife and ecosystems.

Land Use and Pleasure: The construction and operation of a feedlot would alter the landscape and character of our community. Many of us live here to enjoy the rural tranquility and natural beauty that our area offers. The presence of a large-scale industrial operation would diminish the enjoyment of our surroundings and reduce property values for residents who cherish the peaceful ambiance of our small-scale farming in the area. As the nearest household to this operation, with a newborn and a toddler, this development would be a significant disruption to our families enjoyment and peace of the land.

Health and Safety: The increase in traffic and transportation associated with the feedlot operation poses risks to public safety. Heavy vehicles transporting feed, animals, and waste products will lead to road congestion, and potential accidents and safety hazards along Highway 529 and the nearest range roads, which I travel on every day, and which my children will eventually travel on by bus. It is an unacceptable risk for me to put my family on this road given the lack of infrastructure to support the volume of traffic likely to occur if this feedlot is developed.

APPENDIX "F"

Community Impact: I have lived in the Stavely area my whole life and I am proud to be a part of this community. I want to see our community thrive and grow and this feedlot and colony will have the opposite effect. Our community values its close-knit nature and engaged lifestyle. The introduction of a feedlot operation would disrupt this cohesion, potentially leading to social tensions and divisions among residents. It could also deter new families from settling here, thereby affecting our community's growth and vitality. Hutterite colonies do not tend to incorporate themselves into any community or provide community volunteer services. Instead they utilize local infrastructure, such as roads, fire/EMS without contributing back either in hours personally or in equitable tax distribution.

In light of these concerns, I respectfully urge you to reconsider approving the construction of the feedlot operation in our community. It is crucial to prioritize the long-term sustainability of our environment, water resources, public health, and community cohesion over short-term misguided economic gains.

Thank you for considering my concerns. I trust that you will make a decision that reflects the values and well-being of the residents who call Stavely home.

Sincerely,

Sarah Olsen



Municipal District of Willow Creek

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June 19, 2024

Natural Resources Conservation Board
 c/o Kelsey Peddle
 100, 5401 – 1st Avenue South,
 Lethbridge, AB
 T1J 4V6
EMAIL: kelsey.peddle@nrcb.ca

RE: NRCB APPLICATION NO. LA23050
Hutterian Brethren Church of Ivy Ridge
Section 31-14-26-W4M

In reference to the above, on June 12, 2024, the Municipal District of Willow Creek (MD) reviewed the application for proposed development:

“...to construct a chicken layer and pullet barn (111.56 m x 30.48 m), a dairy barn (111.56 m x 36.58 m x 3.7 deep), calf shed and dry cow barn (111.56 m x 45.72 m), broiler barn (111.56 m x 36.58 m), and a mixed poultry barn (76.20 mx 18.29 m) for 150 dairy cows (plus associated dries and replacements), 18,000 chicken layers, 34,000 chicken pullets/broilers, 1,000 ducks, and 100 geese.”

Part 2 Technical Requirements, Declaration and Acknowledgement of Applicant Concerning Water Act License. The MD requests confirmation on the following Licenses to Divert and Use Water and have the licenses been transferred from Irrigation purposes to divert water for livestock /confined feeding operations.

1. 00033215-00-00: transfer 39-acre feet
 - o Irrigation: to Divert and use water, from Mosquito Creek transfer
2. 00034968-00-00: transfer 21-acre feet
 - o Irrigation: to Divert and Use Water, from Mosquito Creek through Works of Squaw Coulee Diversion

The MD requests confirmation that the applicant has received a license from Alberta Environment and Protected Areas to construct the water reservoir which is shown on the drawings provided as part of this application.

The MD requests confirmation from the applicant, NRCB and from Alberta Environment that there is sufficient water to support this application:

- o What is the projected yearly water usage required for the proposed CFO's?

It was noted that (2) two Water Well Drilling Reports (Well Owner: Olson) were included in the NRCB LA23050 application. The MD is requesting an explanation on the purpose of these reports and if the applicants' intentions are to use the water wells for the proposed developments?

The MD requests confirmation that the applicants have applied and registered to drill additional water wells on the proposed lands for proposed developments to ensure projected water usage quantities are met?

The application does not comply with the following planning documents:

1. *Municipal Development Plan (MDP) Bylaw 1765, June 14, 2017 (consolidated to Bylaw No. 1841, August 2019)*

o *Section 1 General Policies:*

- *1.6 To ensure consistency exists between this long-range plan, the Land Use Bylaw and any other duly adopted statutory plans.*
- *1.7 To mitigate, to the best of the MD's ability, ESAs, wetland and riparian areas so they are not comprised by developments.*

o *Section 2 Agriculture:*

Objectives:

- *To mitigate, to the best of the MD's ability, the siting of any confined feeding operation (CFO) / intensive livestock operation (ILO) to minimize conflicts with adjacent land uses.*

Policies:

- *2.3 The MD shall establish guidelines with regards to the Natural Resources Conservation Board (NRCB) for the regulation and approval of CFO's / ILO's within the MD.*

o *Section 6 Transportation:*

Objectives

- *To maintain a transportation network that meets the needs of MD residents and industry and provides efficient and effective connections and routes through the MD; and*
- *To consult with Alberta Transportation regarding transportation routes of mutual interest or jurisdiction.*

Policies:

- *6.1 The MD shall maintain a road network that provides for the safe and efficient movement of people, goods and services.*
- *6.2 Development adjacent to local roads and provincial highways should occur in a manner which allows for the safe operation and the future upgrading of existing corridors.*
- *6.4 The MD shall make every effort to coordinate land use planning and development with Alberta Transportation in order to reduce land use conflicts along provincial transportation corridors.*

- *6.6 The MD shall ensure the function, safety and construction standards of the MD road system are not compromised by subdivision and development proposals.*

MD comments to MDP - Section 6 Transportation

Director of Infrastructure provided comments upon inspection of municipal roads, Range Road 270 and Range Road 265:

- **Range Road 270**
 - Medium/High Grade graveled roadway
 - ~7.5 – 8m in width
 - Minimal ditch definition and road height on the west side Road will be soft in the spring
 - Route passes 1 residence located on the west side of the road Horizontal alignment is straight with no curves
 - Vertical alignment is relatively flat
- **Range Road 265**
 - High grade graveled roadway
 - North 90m of road is paved
 - Old oiled roadway that has been turned back to gravel
 - Road surface turns back to an Oiled surface 1 mile south of Highway 529
 - ~7.5m in width
 - Road will be soft in the spring
 - Horizontal alignment is straight with no curves
 - Vertical alignment is relatively flat

It is important that the traffic generated as a result of the development is understood and that the transportation infrastructure required to support the development is considered. Appropriate and recommended road upgrades for Range Road 270 and Range Road 260, would be required to support the proposed development, and should be provided by a Professional Engineer following a review of the existing and future traffic patterns through a Transportation Impact Assessment (TIA). A Heavy Haul Agreement should be considered if the traffic volumes and types generated by the development require it.

Pursuant to the Municipal District of Willow Creek Municipal Development Plan Bylaw No. 1765, Section 6; Policies 6.1 and 6.6, the MD requests that the NRCB application, if approved, include the requirement for the applicant to undertake and provide a 'Traffic Impact Assessment (TIA)' report, to the M.D. of Willow Creek, which outlines projected traffic volumes and required upgrades, prepared in accordance with the Alberta Traffic Impact Assessment Guidelines (see attached).

To facilitate the implementation of the 'TIA', the MD requests that, as a condition of approval, the NRCB require the applicant to enter into a 'Development Agreement', between the Municipal District of Willow Creek No. 26 and Hutterian Brethren Church of Ivy Ridge, to address required road upgrades outlined in the 'TIA'.

Additionally, the MD will require a Heavy Haul Agreement be entered into between the MD of Willow Creek and applicant which will address road maintenance that arise due to high traffic volumes generated by the proposed developments prior to commencement of construction prior to NRCB approval through the entire life of the project.

o *Section 9 Confined Feeding Operations/Intensive Livestock Operations*

Objectives:

- *To provide the NRCB with development and siting requirements that the MD wish to have considered when applications for CFO's/ILO's are considered for approval; and*
- *To provide guidelines for the MD when providing comments to the NRCB regarding applications for CFO's/ILO's.*

Policies:

- *9.1 The following development setbacks are to be applied:*
 - a. *the appropriate setbacks from the right-of-way of any public roadway which is not designated as a primary highway as established in the Land Use Bylaw*
- *9.2 The NRCB shall be requested to consider:*
 - a. *the cumulative effect of a new approval on any area near other existing CFOs/ILOs;*
 - b. *environmentally significant areas contained in the "Municipal District of Willow Creek: Environmentally Significant Areas in the Oldman River Region" report;*
 - c. *providing notice to adjacent landowners including applications for registration or authorization;*
 - d. *applying minimum distance separation calculations to **all** country residential development;*
 - e. *restricting development in the flood plain, floodway, the flood way fringe and flood prone, or hazard lands within or adjacent to any watercourse within the MD; and*
 - f. *restricting development in any wetland or riparian area.*

MD comment's MDP - Section 9

Section 9.1(a) – the submitted site plan does not provide setback distances of proposed developments to the municipal road right-of-way(s) or the provincial road right-of-way.

Section 9.2(d)

The required Minimum Distance Setback (MDS) noted on NRCB LA23050 application, page 15 – 16, does not appear to meet the required MDS for all residents listed on page 14. The MD requestions confirmation as to how the NRCB and applicant will address the MDS to all residents within the MDS.

○ *Section 15 Development Criteria*

The intent of this section is to minimize land use conflicts with other uses in the immediate vicinity, to ensure that a quality and compatible development can be provided.

Objectives:

- *To ensure all developments in the MD follow the standards established in the Land Use Bylaw;*
- *To Provide applicants with guidance as to the acceptable standards for development in the MD.*

Policies:

- *15.1 All development shall occur on parcel sizes outlined in this MDP or the Land Use Bylaw suitable for the proposed use.*
- *15.2 Development approvals should ensure that non-compatible land uses are sited properly.*
- *15.3 the Development Authority may require a developer to provide additional information to determine the suitability of a site. Such information may include the provision of percolation and soil stability tests as well as other geotechnical data.*
- *15.4 The Development Authority shall ensure development within the MD meets or exceeds the minimum distance separation (MDS), unless waived by the Subdivision and Development Authority.*
- *15.5 The Development Authority shall require the NRCB to take into consideration the policies adopted in this plan and the Land Use Bylaw, when issuing an approval.*

2. The application does not comply Land Use Bylaw No. 1826, Schedule 2 Rural General (RG) land use district, Section 3 Minimum Setback Requirements. It appears that NRCB LA23050 application site plan does not provide the setback distances for all proposed developments from adjacent property boundaries, municipal road right of ways, provincial highway and topographical features (wetlands) on the lands.

The site plan provided in the application indicates proposed developments are encroaching and/or straddling the NE/SE quarter section boundaries. The MD recommends that the applicant re-locate proposed developments or consolidates the lands to accommodate proposed developments to ensure MD setback requirements are met. The applicant may contact the Municipal District to discuss the minimum setback requirements and a revised site plan to reflect the setback distances of the proposed development to ensure minimum setback requirements are met.

Other Planning documents to be considered due to application location close proximity of the plan areas.

- Bylaw 1836 Little Bow River Project Intermunicipal Development Plan Final July 2022
- Bylaw 1466 Clear Lake Area Structure Plan May 2004

APPENDIX "G"

NRCB LA23050

Hutterian Brethren Church of Ivy Ridge

June 19, 2024

- Intermunicipal Development Plan Bylaw 1892 MD of Willow Creek and Bylaw 818 Town of Stavely

The land zoning of the application site, and surrounding lands within 1/2 mile are currently zoned 'Rural General (RG)'.

The Municipal District of Willow Creek thank you for the referral and the opportunity to comment to provide planning and development requirements to consider in your decision making. If you require additional information or have any questions, please call (403) 625-3351, extension 235 or via email at chisholm@mdwillowcreek.com.

Thank you

(VIA EMAIL ONLY)

Cindy Chisholm

Director of Planning & Development

References:

- Alberta 'Traffic Impact Assessment Guidelines', February 2021
- Municipal Development Plan Bylaw 1765 (June 14, 2017 – consolidated to Bylaw No. 1841, August 21, 2019)
- Land Use Bylaw 1826, Schedule 2 Rural General (RG), Section 3 Minimum Setback Requirements.
- Bylaw 1836 Little Bow River Project Intermunicipal Development Plan Final July 2022
- Bylaw 1466 Clear Lake Area Structure Plan May 2004
- Intermunicipal Development Plan Bylaw 1892 MD of Willow Creek and Bylaw 818 Town of Stavely

Copied (by email):

- Councillor Brian Nelson – Division 7
- Chief Administrative Officer Derrick Krizsan
- Director of Infrastructure Craig Pittman
- ORRSC Senior Planner, Diane Horvath



Municipal District of Willow Creek

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July 18, 2024

Natural Resources Conservation Board
 c/o Kelsey Peddle
 100, 5401 – 1st Avenue South,
 Lethbridge, AB
 T1J 4V6
EMAIL: kelsey.peddle@nrcb.ca

RE: NRCB APPLICATION NO. LA23050 - AMENDED
Hutterian Brethren Church of Ivy Ridge
Section 31-14-26-W4M

In reference to the above, on July 10, 2024, the Municipal District of Willow Creek (MD) reviewed the amended application for proposed development:

“...to construct a chicken layer and pullet barn (111.56 m x 30.48 m), a dairy barn (111.56 m x 36.58 m x 3.7 deep), calf shed and dry cow barn (111.56 m x 45.72 m), broiler barn (111.56 m x 36.58 m), and a mixed poultry barn (76.20 mx 18.29 m) for 150 dairy cows (plus associated dries and replacements), 18,000 chicken layers, 34,000 chicken pullets/broilers, 1,000 ducks, and 100 geese.”

Part 2 Technical Requirements, amendments proposed to relocate the above ground liquid manure storage tank and manure storage pad from the southeast part of the CFO site to the northeast part of the site to accommodate neighbour concerns.

In addition to the comments, dated June 19, 2024, previously submitted to NRCB, the MD has the following comments:

- Amended site plan does not provide distances of proposed developments, between the slurry tank, solid manure storage, pond, and sanitary discharge pond.
- Page 14 of 43, the MDS do not reflect the new distances of the relocation of the above ground liquid manure storage tank and manure storage pad to the neighboring residences.
- What is the volume of the sanitary discharge pond ?
- The distance of the stormwater ponds to municipal road allowance, property boundaries and CFO buildings.
- Batching plant and storage with setback distances are not noted on the amended site plan. This development requires a development permit application to be submitted to the Municipality for a decision.

APPENDIX "H"

NRCB LA23050 - Amended
Hutterian Brethren Church of Ivy Ridge
July 18, 2024

The M.D. wishes to advise the NRCB and the applicants that the Municipal Planning Commission is not fettered in any future decision it may make that arises from a future application for any discretionary uses which fall under the jurisdiction of the Municipal District by virtue of the approval or denial by the NRCB of a confined feeding operation application.

The Municipal District of Willow Creek thank you for the referral and the opportunity to comment to provide planning and development requirements to consider in your decision making. If you require additional information or have any questions, please call (403) 625-3351, extension 235 or via email at chisholm@mdwillowcreek.com.

Thank you

(VIA EMAIL ONLY)

Cindy Chisholm
Director of Planning & Development

References:

- Municipal Development Plan Bylaw 1765 (June 14, 2017 – consolidated to Bylaw No. 1841, August 21, 2019)
- Land Use Bylaw 1826, Schedule 2 Rural General (RG), Section 3 Minimum Setback Requirements.

Copied (by email):

- Councillor Brian Nelson – Division 7
- Chief Administrative Officer Derrick Krizsan
- Director of Infrastructure Craig Pittman
- ORRSC Senior Planner, Diane Horvath

APPENDIX "I"

July 18, 2024

To: Kelsey Peddle, NRCB Approval Officer

Cc: Cindy Chisholm, MD of Willow Creek Director of Planning & Development

Chelsae Petrovic, MLA Livingstone-Macleod

RJ Sigurdson, MLA, Minister of Agriculture and Irrigation

Rebecca Schulz, MLA, Minister of Environment and Protected Areas

John Barlow, MP Foothills

Town of Stavely

The Ivy Ridge Brethen Colony proposed Confined Feedlot Operation East of Stavely, if approved, will pose materially negative and long-lasting effects on the community, the water source, and the environment and as such is not an appropriate use of land in that location. The negative effects at the community level far outweigh any benefits.

Do not approve application LA23050. This is not in the best interests of the community, it's members, and the environment.

Name: Cory Flood

Address: [REDACTED] Medicine Hat, Ab, [REDACTED]

Phone Number: [REDACTED]

Email Address: [REDACTED]