



**BOARD DECISION  
REQUEST FOR REVIEW**

**RFR 2025-01 / LA23050**

In Consideration of a Request for Board  
Review filed under the *Agricultural  
Operation Practices Act*

Hutterian Brethren of Ivy Ridge

February 26, 2025

**The Board issues this decision under the authority of the *Agricultural Operation Practices Act* (AOPA or the Act), following its consideration of requests for the Board’s review (RFR) of Decision Summary LA23050.**

## **1. Background**

On January 28, 2025, a Natural Resources Conservation Board (NRCB) approval officer issued Decision Summary LA23050 (Decision Summary). The decision granted an application by the Hutterian Brethren of Ivy Ridge (Ivy Ridge Colony or the Colony) for an NRCB Approval to construct a new multi species confined feeding operation (CFO). The proposed CFO is located at Sec. 31-14-26 W4M in the Municipal District of Willow Creek No. 26 (MD of Willow Creek or MD).

Following the issuance of the Decision Summary, the Board received requests for review (RFRs) of the Decision Summary within the filing deadline of February 11, 2025, from six parties who had been found to be directly affected by the approval officer. These parties were: Terry Olsen, Chelsey Hurt, Bev Olsen, David Olsen, Greg and Sarah Olsen, and the MD of Willow Creek.

On February 12, 2025, the NRCB sent a Notice of Filed Requests for Board Review and provided a rebuttal opportunity to the directly affected parties listed in the Decision Summary. The rebuttal opportunity gives parties that may have an adverse interest to the matters raised in the RFRs a chance to submit their views. Ivy Ridge Colony filed a rebuttal on February 19, 2025. NRCB Field Services filed a submission on behalf of the approval officer on the same date. These submissions were made within the filing deadline.

Under the authority of section 18(1) of the *Natural Resources Conservation Board Act*, a division of the Board (panel) consisting of Sandi Roberts (chair), Rich Smith, Laura Dunham, and Darin Stepaniuk was established to consider the RFRs and decide whether a review is warranted. As used here, a “review” is a quasi-judicial hearing or written review in which the parties can submit expert and witness testimony and other evidence, when relevant, to the issues selected by the Board to be considered at the oral hearing or written review.<sup>1</sup> References to the “Board” in this document are to findings of the panel of Board Members established specifically for this file.

## **2. Documents Considered**

The Board considered the following information:

- Decision Summary LA23050, dated January 28, 2025
- Technical Document LA23050, dated January 28, 2025
- Approval LA23050, dated January 28, 2025

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<sup>1</sup> For more information on Board reviews, see NRCB, *Board Reviews & Court Decisions – Board Review Process*, [online](#).

- Leak Detection Monitoring Requirements LA23050, dated January 28, 2025
- RFR filed by Terry Olsen, received February 10, 2025
- RFR filed by Chelsey Hurt, received February 11, 2025
- RFR filed by Bev Olsen, received February 11, 2025
- RFR filed by David Olsen, received February 11, 2025
- RFR filed by Greg and Sarah Olsen, received February 11, 2025
- RFR filed by Shauna Finlay on behalf of the MD of Willow Creek, received February 11, 2025
- Ivy Ridge Colony rebuttal, received February 19, 2025
- NRCB Field Services submission, received February 19, 2025
- MD of Willow Creek Municipal Development Plan, Consolidated to Bylaw 1841, August 2019
- MD of Willow Creek Land Use Bylaw, Consolidated to Bylaw 1908, June 2021

The Board's review manager and general counsel were copied with a February 25, 2025 email from Chelsey Hurt to NRCB Field Services' legal counsel. The email seeks to clarify the number of persons who responded to notice of the CFO application with submission of a petition. The petition and the discrepancy in the number of signatories is addressed in ss. 5.3.1 and 5.3.2 of this decision below.

### **3. Board Jurisdiction**

The Board's authority for granting a review of an approval officer's decision is found in section 25(1) of AOPA, which states:

- 25(1) The Board must, within 10 working days of receiving an application under section 20(5), 22(4) or 23(3) and within 10 working days of the Board's determination under section 20(8) that a person or organization is a directly affected party,
- (a) dismiss the application for review, if in the opinion of the Board, the issues raised in the application for review were adequately dealt with by the approval officer or the issues raised are of little merit, or
  - (b) schedule a review.

### **4. Submissions**

#### **4.1 Issues Raised in the RFR**

The RFRs raised the following issues:

- water supply
- municipal development plan inconsistency
- community effects
- cumulative effects
- need for independent assessment
- health impacts
- minimum distance separation determination

- nuisance concerns
- CFO scale
- regional limits for large-scale farming operations
- road impacts
- groundwater resource protection
- surface water protection
- wildlife impacts
- property value impacts
- Safety Code compliance

#### **4.2 Submission of NRCB Field Services**

NRCB Field Services took no position on whether the Board should schedule a review. The Field Services submission also:

- noted that the issue of road access included in the MD of Willow Creek RFR was not raised in its responses to the CFO application,
- provided the original responses to the CFO application from the parties who submitted RFRs,
- clarified the approval officer’s information about the number of people who responded to notice of the CFO application,
- stated that there is no basis for allegations in the RFRs relative to bias, and
- directs the Board to specific information in the approval officer’s decision material addressing items raised in the RFRs.

#### **4.3 Ivy Ridge Colony Rebuttal**

The Ivy Ridge Colony rebuttal was submitted by legal counsel for the Colony, Richard Harrison. The rebuttal responded to issues raised in the RFRs with submissions and information on the following:

- municipal development plan wetland and riparian area provisions
- road access
- water licensing for the CFO
- groundwater protection
- Ivy Ridge Colony public consultation efforts

### **5. Board Deliberations**

#### **5.1 Water Supply**

Some of the RFRs raised the issue of whether there was a source of water sufficient to support the operation in conjunction with the Colony’s overall needs. A number of the RFRs alluded to

the CFO being associated with a new Hutterite Colony. One of the RFR's referenced Ivy Ridge Colony publicly stating that the CFO will be part of a "daughter colony".

An approval officer's authority in addressing an application for approval of a CFO under AOPA is confined to the CFO. The overall water needs of a new Hutterite colony is far beyond the scope of AOPA authority.

The water needed for the CFO itself is also beyond the scope of AOPA. As addressed in the approval officer's Decision Summary, all water licensing is governed by the *Water Act* and not AOPA. Alberta Environment and Protected Areas is responsible for administration of the *Water Act* for all agricultural operations, including CFOs. A new CFO will not be able proceed if it cannot secure water under the *Water Act* sufficient for its needs. *Water Act* licensing is a requirement additional to AOPA approval.

Information provided by Alberta Environment and Protected Areas to the approval officer and included in the Decision Summary at p. 33 suggested that Ivy Ridge Colony has secured *Water Act* licenses sufficient to meet the water needs for its CFO. This is also addressed in the Colony's RFR rebuttal submission.

The Board notes that the *Water Act* provides for consideration of effects on the aquatic environment, hydraulic, hydrological, hydrogeological effects, and impacts to other water users in making licensing and allocation transfer decisions.

The Board does not view the issue of water supply for the Colony as a whole as a basis for conducting a review. The Board's view is that the issue of water supply for the CFO was adequately addressed by the approval officer.

## **5.2 Municipal Development Plan Consistency**

Section 20(1)(a) of AOPA requires an approval officer to deny a CFO application if there is an inconsistency with municipal development plan (MDP) land use provisions.

The RFRs of Chelsey Hurt and Greg and Sarah Olsen reference the MD of Willow Creek raising MDP inconsistency as an issue during the approval officer's review of the CFO application. Chelsey Hurt's RFR also indicated that the approval officer selectively applied certain aspects of the MDP, dismissing all sections relating to economic impact, transportation, and environmental concerns.

In contrast to the position the MD of Willow Creek evidently took before the approval officer, its RFR to the Board essentially only raised a single item of MDP inconsistency related to wetlands and riparian areas. The RFR asserted that the CFO is inconsistent with MDP general policy 1.7 and confined feeding operations/intensive livestock operations policy 9.2(f) which state:

1.7 To mitigate, to the best of the MD's ability, ESAs, wetland and riparian areas so they are not compromised by developments.

9.2 The NRCB shall be requested to consider:

f. restricting development in any wetland or riparian area.

The MD of Willow Creek's RFR indicated that the inconsistency arises because of the presence of wetlands at the CFO location.

Appendix A of the Decision Summary analyzed the MDP for CFO inconsistency with land use provisions. The approval officer determined that there were no inconsistencies. The Board is satisfied with the adequacy of the approval officer's analysis.

With respect to MDP general policy 1.7, the approval officer concluded that it is directed at the MD of Willow Creek and is not a land use provision. The Board agrees with this interpretation.

The approval officer found no inconsistency with confined feeding operations/intensive livestock operations policy 9.2(f) because the proposed CFO is not located in a wetland or riparian area, and it meets the AOPA setbacks to common bodies of water. The approval officer clearly found 9.2(f) as being directed at restricting construction at the actual location of wetlands and riparian areas as opposed to restricting construction in their vicinity. The Board agrees with this interpretation.

The Board is satisfied that MDP consistency was adequately addressed by the approval officer.

### **5.3 Community Effects**

A number of the RFRs asserted that community effects were not adequately addressed by the approval officer. Specific alleged shortcomings relate to AOPA's directly affected standing provisions, the weight given to public input and a petition in opposition to the CFO, and consideration of identified specific negative community impacts.

#### ***5.3.1 Directly Affected***

The Board does not accept the position that AOPA's directly affected provisions unduly constrain local input.

Pursuant to s. 5(c) of the Agricultural Operations, Part 2 Matters Regulation, persons who reside on or own land that is within specified distances from a CFO are affected parties. As a matter of policy, if those affected parties respond to notice of the CFO application, they are presumed to be directly affected: see NRCB Operational Policy 2016-7: *Approvals* (the Approvals Policy). Section 19(4) of AOPA allows for additional persons to apply to an approval officer for directly affected status. A person who is determined not to be directly affected can

apply to the Board for review of the decision under section 20(6) of the AOPA. This scheme potentially allows community members beyond those with automatic directly affected status to achieve directly affected status. As noted at p. 23 of the Decision Summary, an approval officer makes those determinations based on demonstration of the following in accordance with the Approvals Policy:

1. A plausible chain of causality exists between the proposed project and the effect asserted;
2. The effect would probably occur;
3. The effect could reasonably be expected to impact the party;
4. The effect would not be trivial; and
5. The effect falls within the NRCB regulatory mandate under AOPA.

This test is consistent with giving meaning to “directly affected” in AOPA.

The approval officer determined that none of the community members who responded to notice of the application (additional to those with automatic directly affected status based on distance) provided sufficient information to establish that they were directly affected.

The Board notes the discrepancy about the number of persons who responded to notice of the CFO application with submission of a petition. The RFR of Chelsey Hurt references 749 individuals and 727 individuals exclusive of directly affected parties and others who submitted a longer letter. The February 25, 2025 email from Chelsey Hurt to NRCB Field Services’ legal counsel gives the number as 719. The RFR of Bev Olsen references over 700 responses. The RFR of Greg and Sarah Olsen gives the number as 727 exclusive of additional letters from the public and directly affected parties. The Field Service’s submission states that 441 people responded to notice of the application: 16 people who were determined to be directly affected, 27 persons who submitted individual responses who were determined to not be directly affected, 397 petition signatories who were determined to not be directly affected, and one additional petition signatory from Medicine Hat identified post decision.

Regardless of the discrepancy, no person additional to those the approval officer found to be directly affected pursued Board review of their status under s. 20(6) of AOPA.

### **5.3.2 Public Input and Petition**

The Board’s view is that the approval officer addressed public input and the petition appropriately.

As noted in the Decision Summary at p. 7, approval officers apply a presumption that an application has acceptable effects on the community if the application is consistent with the MDP. Previous NRCB panel decisions have recognized that this is appropriate having regard for municipal land-use planning authority and MDP zoning as benchmarks for acceptable and non-acceptable community effects: see *Spruit Farms Ltd.*, RFR 2018-13 at p. 4 and *Sundown Feeders Ltd.*, RFR 2019-04 at p. 7. In *Spruit Farms Ltd.*, the NRCB panel was satisfied that the municipality had addressed effects on the community associated with CFO siting within its

planning and land use documents and found that the number of affected parties was not a determinative factor in assessing the general effects on the community and whether a CFO was an appropriate land use.

The presumption can be overcome by sufficient contrary information.

The approval officer received a large number of written responses during the application review process. The concerns expressed in these responses were considered in detail in Appendix B and Appendix C of the Decision Summary. The approval officer also noted that a significant number of individuals signed a petition opposing the CFO. The Decision Summary indicated that the petition stated:

The Ivy Ridge Breth[re]n 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, its members, and the environment.

As previously discussed, the approval officer reviewed the directly affected status of the petition signatories and determined that they were not directly affected. Relative to community effects, the approval officer noted that the petition did not include any reasoning behind the assertion that the CFO will pose materially negative and long-lasting effects on the community. The Board's view is that the absence of reasons for the position taken in the petition also means that it should be given little weight in evaluating community effects, regardless of the number of signatories.

The Board also observes that petitions as a source of information about CFO effects can be problematic for other reasons. Petition signatories may have a variety of motivations for signing including reasons unrelated to the petition merits (for example, only signing to be helpful to the person requesting a signature). A petition also provides no insight into the views of community members who did not sign.

### ***5.3.3 Negative Community Effects***

A number of the RFRs raised specific negative community impacts: threat to the financial stability of small-scale farm operations, lack of Colony contribution to the school system and local economy, and lack of Colony contribution to community building. These type of impacts are addressed in the Decision Summary. The approval officer concluded that the information provided during the application review process was insufficient to rebut the presumption of acceptable effects on the community based on consistency with the MDP. The Board agrees with the approval officer's conclusion. The specific negative community impacts raised in the RFRs and during the approval officer's application review either do not relate to the CFO specifically or are speculative in nature.



In *G&S Cattle Ltd.*, RFR 2022-11, the NRCB denied a request for review of an approval officer's decision denying a CFO approval. The approval officer concluded that the proposed CFO would pose materially negative and long-lasting effects on the community and would not be an appropriate use of the land. In that case, the presumption of acceptable community effects based on MDP consistency was rebutted.

The NRCB found that the approval officer for *G&S Cattle Ltd.* rightly considered the significant emphasis and importance placed on the Pigeon Lake watershed by directly affected parties, the Pigeon Lake Watershed Management Plan, and the Pigeon Lake Watershed Area Concept Plan. The NRCB noted the credibility and usefulness of the plans were substantiated by the contributions of professional planners, multi-stakeholder technical plan advisors including provincial environmental officials, the 12 municipalities of Pigeon Lake, the four bands of the Maskwacis Nations, and the Pigeon Lake Water Association that included over 1,100 members. The plans were also informed by results from several studies that examined the complex interactions between watershed activities and Pigeon Lake's ecological health. The NRCB also expressed that the nature in which the watershed plans were developed and the commitment to those plans as represented by the signatories represented a solid example of best practice in formalizing community interests.

The finding in *G&S Cattle Ltd.* that the CFO could not be approved based on negative community effects was supported by a substantial body of information. That level of information was not provided here.

### **5.3.4 Conclusion on Community Effects**

The Board's view is that community effects were adequately addressed by the approval officer.

## **5.4 Cumulative Effects**

The RFR of Chelsey Hurt stated that the approval officer failed to assess cumulative environmental effects in approving the CFO. The RFR also referenced s. 49(d) of the *Environmental Protection and Enhancement Act* (EPEA) and the guidance document *Cumulative Effects Assessment in Environmental Impact Assessment Reports Required under the Alberta Environmental Protection and Enhancement Act (Cumulative Effects Guidance Document)*.

The Decision Summary indicated at p.44 that approval officers generally do not consider cumulative environmental effects in CFO approval decision-making consistent with prior Board decisions.

Approval officers in considering CFO applications, and the Board in addressing reviews of approval decisions, only have the authority provided for in legislation. AOPA does not provide for cumulative environmental effects assessment: see *Zealand Farms*, RFR 2011-02 at p. 5 and *Double T Cattle Co. Ltd.*, RFR 2022-08, at p. 9.

Section 49(d) of EPEA and the *Cumulative Effects Guidance Document* only apply to cases where preparation of an environmental impact assessment report has been required under EPEA.

Section 49(d) of EPEA and the *Cumulative Effects Guidance Document* are in no way applicable to the CFO application that was made here.

The Board is satisfied that the approval officer addressed cumulative effects appropriately.

## **5.5 Need For Independent Assessment**

The RFR of Chelsey Hurt stated that the approval officer failed to conduct an independent hydrological study. This assertion is made with reference to water supply for the proposed CFO.

The RFR of Greg and Sarah Olsen referred to a failure of the approval officer because the decision was based on internal rather than external assessment.

As previously discussed, water supply for the proposed CFO is the responsibility of Alberta Environment and Protected Areas through administration of the *Water Act*.

The process used in review of the CFO application is summarized at pp. 41 and 42 of the Decision Summary. Most importantly, the authority for making decisions on CFO applications under AOPA is given to approval officers. This is the system the Legislature has seen fit to establish.

The Board's view is that the need for independent assessment has been adequately addressed by the approval officer or otherwise is of insufficient merit to warrant a review.

## **5.6 Health Impacts**

The RFRs of Chelsey Hurt and Bev Olsen raised health impacts as review grounds.

The approval officer's consideration of health impacts is set out at p. 39 of the Decision Summary. Notably, Alberta Health Services has indicated that when industry best management practices and NRCB operating requirements are used appropriately, health concerns about the application should be prevented.

The Board is satisfied that health impacts have been adequately addressed.

## **5.7 Minimum Distance Separation Determination**

Section 3 of the Standards and Administration Regulation prohibits CFO approval unless the proposed CFO meets minimum distance separation (MDS) requirements measured from the outside walls of neighboring residences to the point closest to manure storage facilities or manure collection areas.

The RFR of Chelsey Hurt asserted that the MDS requirements are outdated. The RFR does not substantiate the assertion.

The determination of MDS for a new CFO under the Standards and Administration Regulation depends in part on application of a dispersion factor and a technology factor. The Regulation provides default values for these factors that can potentially be adjusted to result in a greater MDS if there is satisfactory information to support an adjustment. As set out at p. 34 of the Decision Summary, the approval officer found no basis for an adjustment. The Board concurs.

The Board sees no issue with the approval officer's MDS determination.

## **5.8 Nuisance Concerns**

The RFRs of Chelsey Hurt and Bev Olsen raised nuisance concerns as review grounds.

The approval officer's consideration of nuisance concerns is set out at p. 35 of the Decision Summary. As the approval officer has noted, AOPA's MDS requirements are a proxy for minimizing odours and other nuisance effects from CFOs. The proposed CFO meets the MDS to all neighbouring residences. Some of the parties outside of the MDS may experience odours and other nuisance impacts. The frequency of these exposures will likely be limited and of short duration. If persistent issues arise during CFO operations, parties can potentially resolve them through discussion with the operator. Concerns can also be reported to the NRCB toll free reporting line at 1-866-383-6722.

The Board's view is that nuisance concerns have been adequately addressed.

## **5.9 CFO Scale**

The RFR of Chelsey Hurt asserted that this proposed CFO has been misclassified and that its commercial nature requires the application of legal requirements beyond AOPA.

This type of issue is addressed by the approval officer at p. 40 of the Decision Summary. The proposed operation meets the definitions of agricultural operations and CFOs in AOPA. The MD of Willow Creek MDP acknowledged the role of the NRCB in regulating CFOs under AOPA. There is simply no question that this proposed CFO falls within the scope of the AOPA.

The assertion that the CFO has been misclassified has no merit and it does not support the Board granting a review.

## **5.10 Regional Limits for Large-Scale Farming Operations**

The RFR of David Olsen indicated that there are already four Hutterite colonies within a 12-mile radius of the Ivy Ridge Colony CFO at issue here, suggesting a need for limits on these kinds of developments.

The Board's view is that this is a matter beyond the scope of AOPA. It is potentially something that could be addressed by the MD of Willow Creek through its municipal planning commission,

in an MDP, or in an intermunicipal development plan, or through regional planning under the *Alberta Land Stewardship Act*.

As this is an issue beyond the scope of AOPA, it does not provide a basis for the Board granting a review.

### **5.11 Road Impacts**

One of the RFRs expressed concerns about road degradation, increased maintenance costs for the municipality, and safety concerns for local residents as a result of traffic created by the CFO. The MD of Willow Creek RFR noted that there had been no discussion between the applicant and the MD regarding access to the project site from a municipal road.

The concerns about road impacts have been addressed in the Decision Summary at p. 28 and p. 38. The NRCB does not have direct responsibility for regulating road use. The MD has jurisdiction over municipal roads, while Alberta Transportation and Economic Corridors (TEC) has jurisdiction over the provincial highway on the north side of the site. The MD of Willow Creek has requested a Traffic Impact Assessment (TIA), a Heavy Haul agreement, and agreements to address road access and development. While the Decision Summary noted that the applicant has begun the process of having a TIA completed, the NRCB has stated in previous decisions, “field staff do not have the requisite expertise to develop, mediate, or enforce road use agreements/conditions.” (Hutterian Brethren of Murray Lake, RFR 2020-09, p. 4).

The Board finds that the issue of road impacts has been addressed sufficiently.

### **5.12 Groundwater Resource Protection**

Concerns were expressed in the RFRs about the potential for the applicant to use groundwater as a source of water for the development and the impact this could have on other groundwater users in the area. There also were concerns raised about the possibility of a shallow water table at the CFO site and the site being in an area of potential artesian flow conditions. The RFRs raised concerns about the potential for manure storage and application associated with the CFO to cause contamination of groundwater.

The issue of the water supply for the CFO has been considered in section 5.1 of this decision. The issues of a potential shallow water table and protection of groundwater are addressed at length on pp. 33-34 of the Decision Summary, while the potential artesian flow conditions are addressed on pp. 10-11 of the Decision Summary. The Decision Summary concluded that the CFO poses a low risk to groundwater and the Board finds no evidence in the RFRs rebutting this conclusion. The protection of groundwater is further addressed in Appendix E of the Decision Summary—the explanation of the conditions for Approval LA23050.

The Board finds that the issue of groundwater resource protection has been adequately dealt with by the approval officer.

### **5.13 Surface Water Protection**

The RFRs raised concerns about marshes and wetlands located in the section of land where the CFO will be developed, as well as the proximity of the site to Mosquito Creek. The RFRs suggested that the CFO could cause contamination of this surface water. One of the RFRs expressed concerns about a shallow water table at the CFO site being connected to the marshes and wetlands on the section of land and ultimately to Mosquito Creek.

Page 11 of the Decision Summary noted that the CFO will not be located in a wetland or riparian area and the CFO site meets AOPA requirements for setbacks from common bodies of water. The CFO site is over three miles from the nearest point of Mosquito Creek. The Board finds no evidence in the RFRs of a shallow water table at the CFO site that is connected to nearby surface water. Protection of surface water from contamination is addressed in pp. 33-34 of the Decision Summary. The Decision Summary included a finding that the CFO poses a low potential risk to surface water and the Board sees no issue with this conclusion.

In the Board's view, surface water protection has been addressed sufficiently.

### **5.14 Wildlife Impacts**

The RFRs raised concerns about the potential impact of the CFO on sensitive wildlife species. While the Board acknowledges that there may be significant wildlife habitat closer to Mosquito Creek, the site of the CFO is agricultural land that has been cultivated and seeded for a number of years. There is no evidence that the CFO site contains sensitive wildlife habitat or that development of this site will have an adverse impact on wildlife species. The Decision Summary addressed the potential impact of the CFO on wildlife on pp. 35-36.

The Board finds that wildlife impacts have been addressed adequately.

### **5.15 Property Value Impacts**

At least one of the RFRs raised negative impacts to property values as an issue supporting a review of the approval officer's decision.

Property value impacts are addressed in the Decision Summary at p. 38. As referenced by the approval officer, the Board has consistently concluded in previous decisions that this is a municipal land-use planning matter beyond the scope of a CFO approval application.

The Board is satisfied that this issue was adequately addressed by the approval officer.

### **5.16 Safety Code Compliance**

The RFR from the MD of Willow Creek expressed concern about "setbacks that would apply to the Feed Mill and Hay Shed and between buildings per any applicable Safety Codes

requirements.” The Board is not aware of any Safety Codes requirements pertaining to CFO facilities, and setbacks between other buildings on this site are beyond the purview of the NRCB. The Board does not find any merit in this specific concern.

## 6. Board Decision

As a result of the Board’s review of the documents under consideration for these RFRs and its deliberations on the issues raised in the RFRs, the Board finds all the issues were adequately dealt with by the approval officer or otherwise are of insufficient merit to warrant a review. The RFRs are denied.

DATED at EDMONTON, ALBERTA, this 26<sup>th</sup> day of February, 2025.

Original signed by:

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Sandi Roberts (chair)

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Rich Smith

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Laura Dunham

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Darin Stepaniuk