



County of Wetaskiwin No. 10

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April 19, 2022

Natural Resources Conservation Board (NRCB)
#303, 4920 – 51 Street
Red Deer, Alberta
T4N 6K8

RE: Supplemental Referral Commentary – Application RA21045 – G&S Cattle Ltd. – NW 3-47-2-W5M

Over the past several weeks, the County of Wetaskiwin through both Council and Administration has received significant questions, comments, and concerns from a vast amount of adjacent property owners, municipalities, special interest groups, and citizens in general with respect to the aforementioned Confined Feeding Operation (CFO) application for 4,000 head of cattle on the lands legally described as above by G&S Cattle Ltd. Due to the large public interest in the matter and as suggested by numerous parties to Council, Council has resolved to send this additional correspondence to be in supplement to the correspondence sent by Mr. Jarvis Grant, Development Officer, on March 23, 2022 with respect to the matter on behalf of the County, which will outline additional points of emphasis that the County wishes for the Natural Resources Conservation Board (NRCB) to take into account.

First, should the NRCB be considering the approval of the proposed CFO, much like the other correspondence that the NRCB has received related to the proposal in which the County has been copied on, the County strongly recommends that the NRCB require an environmental impact assessment and also ensure that all environmental standards outlined by both the Government of Canada and Government of Alberta are mandated by the NRCB on the proposal to the fullest extent possible and adhered to by the Applicant as such, with failure to doing so being met with full enforcement action. Environmental impacts appear to be the most heightened area of concern and the County trusts that the NRCB will mandate provisions that are fully within their inherent jurisdiction related to this matter. Another item of concern is the increased volume of manure and how it is to be applied. Calculations need to be considered as to the ability of the land to retain the nutrients as well as the water quality leaving the land including pathogens, phosphorus and chemicals among a variety of other possible contaminants.

Secondly, with respect to County Infrastructure and the impacts upon it as a result of the proposed CFO, which is not explicitly contained within the relevant planning documents of the County as the approval of CFOs do not fall within our jurisdiction, the County is of the opinion that if approved, a CFO of 4,000 head of cattle will have a detrimental impact on County Infrastructure, specifically in terms of road and bridge infrastructure. This is due to the fact that if the CFO of 4,000 head of cattle is approved, there will undoubtedly be increased levels of heavy commercial and agricultural truck traffic heading to and from the CFO, all along roadways that are under the jurisdiction and maintenance of the County. With increased traffic that is heavy in nature, it will lead to the quality of the road and bridge infrastructure to be deteriorated much more rapidly than what would occur with more regular traffic for a rural area and as such, will have to be maintained and repaired to a more increased level than what would be traditionally expected. With the above being stated, the County would respectfully request that the NRCB first require the Applicant to complete a Traffic Impact Assessment (TIA) for the area based on the typical traffic patterns to the CFO and if deemed necessary through the TIA or based upon best practices for CFOs throughout Alberta, that the Applicant be required to enter into Road Use Agreements with the County and potentially Alberta Transportation that outlines commitment by the Applicant at their sole cost for the mitigation of their direct and indirect impacts to County Infrastructure including, but not limited to intersection treatments, provision of dust suppression, and payment of funds to the County for the ongoing repair and maintenance of road and bridge infrastructure at a minimum.

Lastly, it has come to the attention of the County that only references to the 2000 Edition of the Pigeon Lake Watershed Management Plan were made in the initial correspondence sent by the County by Mr. Grant and not the more recent 2018 Pigeon Lake Watershed Management Plan, with such oversight being completely unintentional in nature, but one in which the County unreservedly apologizes for. In reviewing the 2018 Plan, we do recognize that Objective 2(e) does state that *“Statutory land use restrictions on new or expanded intensive livestock operations (including CFOs) are supported in this Watershed Management Plan”*, but at this time, the Municipal Development Plan (MDP), nor the Land Use Bylaw of the County include restrictions of this nature as our previous correspondence states. Additionally, with respect to the resolution of Council related to this Plan, Council on June 8, 2018 did resolve the following, utilizing the wording recommended to the County by the Pigeon Lake Watershed Management Plan Steering Committee:

“That Council approve the recommendation presented by the Pigeon Lake Watershed Management Plan Steering Committee and having read and considered the Pigeon Lake Management Plan – 2018, resolves as follows:

- 1. The County of Wetaskiwin will work collaboratively with other Pigeon Lake watershed municipalities, the Pigeon Lake Watershed Association and the Pigeon Lake Watershed Steering Committee to implement the Pigeon Lake Management Plan – 2018.*
- 2. The County of Wetaskiwin will reference and consider the recommendations of the Pigeon Lake Management Plan – 2018 in the development of new or updated Statutory Plans required under the Municipal Government Act and in the ordinary business of the municipality.”*

Therefore, in summary, on behalf of the County of Wetaskiwin and the over 11,000 citizens in which we serve, we formally request that the NRCB take these supplementary comments into account and implement the following conditions on the Applicant prior to approving the application and further to

impose conditions sufficient to fully address the concerns should the application be approved as follows:

1. Mandating that an environmental impact assessment be conducted and all environmental standards outlined by both the Government of Canada and Government of Alberta are in effect on the proposal to the fullest extent possible and adhered to by the Applicant as such, with failure to doing so being met with full enforcement action.
2. Requiring the Applicant to complete a Traffic Impact Assessment (TIA) for the area based on the typical traffic patterns to the CFO and if deemed necessary through the TIA or based upon best practices for CFOs throughout Alberta, that the Applicant be required to enter into Road Use Agreements with the County and potentially Alberta Transportation that outlines commitment by the Applicant at their sole cost for the mitigation of their direct and indirect impacts to County Infrastructure including, but not limited to intersection treatments, provision of dust suppression, and payment of funds to the County for the ongoing repair and maintenance of road and bridge infrastructure at a minimum.

In closing, the County of Wetaskiwin has always enjoyed a strong and productive relationship with the NRCB, would greatly appreciate that the NRCB take our concerns serious, and make tangible progress in remedying concern to the benefit of all parties as best as possible if the proposal is approved. If there are any questions regarding this matter, please contact Mr. Rod Hawken, Chief Administrative Officer, by phone at (780) 361-6225, or by email at rhawken@county10.ca, or Mr. Jeff Chipley, Assistant Chief Administrative Officer, by phone at (780) 361-6223, or by email at jchipley@county10.ca.

Yours sincerely,



for Josh Bishop
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:jc

cc: County of Wetaskiwin Council
Mr. Rod Hawken, Chief Administrative Officer (CAO)
Mr. Jeff Chipley, Assistant CAO
Mr. Neal Sarnecki, Director of Planning & Economic Development
Mr. Jarvis Grant, Development Officer