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July 28, 2020

Via Email: Carina.Weisbach@nrcb.ca

Natural Resources Conservation Board  
Agriculture Center  
100, 5401 – 1<sup>st</sup> Ave South  
Lethbridge, AB T1J 4V6  
Attention: Carina Weisbach, Approval Officer

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**RE: LETTER OF OBJECTION TO NRCB Application: LA20014**

**Applicant: Hutterian Brethren Church of Granum (hereinafter referred to as Granum Colony)  
Confined Feeding Operation: 20,000 head Poultry Barn at SE 25-11-28-W4M**

**Objector(s): Eleanor Biddlecombe, Shelby Biddlecombe and Guy Biddlecombe  
Landowners and Residents at NE 36-11-28-W4M.**

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Please accept this letter as our **formal objection** to the proposed Poultry Barn as described above. This development directly and adversely affects our property and our livelihood. We are requesting that the NRCB deny the application made by Granum Colony.

**Granum Colony's application is to locate a 20,000 head Poultry Barn is approximately 1.25 miles from our house. This proposed development is immediately adjacent to Historical Resources Value designated land, designated 5a.**

### **Background**

Our family has owned and resided at the NE 36-11-28-W4M since 1994. We have stewarded our land to a state of health and abundant grassland. We have protected and conserved our water to ensure we have supply for now and the future. We utilize our pastures for grazing and raising livestock, and our water sources are valuable to that operation.

The grounds we have for objecting to the application from Granum Colony are many, and are outlined in detail below:

#### **1. CUMULATIVE EFFECTS ON SURROUNDING AREA**

This application is the second CFO Species application made by Granum Colony for the Meadow Creek area. While it has been rumored, it is now very clear that Granum Colony is planning to build a full Colony, with all CFO Species included. First it was the feedlot application, now the poultry barn. Next it will be the Dairy barn, the Hog Barn, the turkey barn, the sheep barn. **OUR AREA CANNOT SUPPORT A**

**FULL COLONY ON OUR WATER TABLE.** There are over a dozen (12) individual residences within a one mile radius of these proposed developments, most of which have experienced domestic & livestock water issues, wells going dry, water becoming non-potable. Add in the Colony's 6 + CFO's, as well as 100 people, and **NONE OF US WILL HAVE ANY WATER.**

Then what? What are we supposed to do without water? Sell out? To the Colony? While this application looks like it is simply for a Poultry barn, the ramifications to the livelihood of the area are great. Much greater than one Poultry barn.

We have confirmed that Granum Colony has NOT applied for a development permit with the MD of Willow Creek, as of yet. This is a piece-meal application, on species at a time, that is designed to force the MD into approving a full Colony Development.

**THE NRCB NEEDS TO REVIEW THIS APPLICATION, NOT AS A SINGULAR APPLICATION, BUT AS AN ENTIRE DEVELOPMENT SCHEME, WITH ALL SPECIES CFO'S TO BE CONSIDERED AS ONE, TO FULLY GRASP THE IMPACTS TO OUR AREA, OUR LAND, AND OUR LIVELIHOOD.**

## **2. ENVIRONMENTAL**

The application is to place a poultry barn on an elevated area, that drains down into a year-round creek (Meadow Creek) to the north & west, and multiple surface water sources, including regular flood plain, along the ditch and intersection to the east and south. This drains SE across the road into Alan Minor's dugout.

The Topographical map included in the Application, clearly shows significant sloping directly downhill towards the creek to the west, and the easterly drainage ditch.

We will not allow our water sources to be compromised, in either water quality, or quantity. Any contamination that escapes the proposed containment will have dire consequences to our area water supply.

### **1B. BROADER SCOPE ENVIRONMENTAL CONCERNS – FISH BEARING CREEKS AND STREAMS**

In spring, and during the rain season, it is not uncommon for both ditches of RR 280 to be full of water (running into Meadow Creek) from Twp Rd 120 south to Meadow Creek Road.

Those same waterbodies are tributaries to Willow Creek, and the Oldman River, thereby impacting a great number of agricultural and domestic water users from those sources on down the line. Both Meadow Creek, and Trout Creek, which is to the north of this development, have been designated as 'fish bearing', as is Willow Creek, and any contamination of the tributaries of these water bodies, would be detrimental to the fish habitat.

On these Environmental grounds alone, the NRCB must deny this Application.

## **3. INFRASTRUCTURE**

The proposed Poultry barn will be utilizing our local municipal roads and bridges that, frankly, are not built for continuous heavy truck traffic. RR 280 is a medium grade road, and in some places, low grade road – with any amount of rain, it is mush and gumbo, and is often 4-wheel drive passable only.

The bridge on Twp Rd 120 over Meadow Creek has been compromised in the past year (damage was reported to be caused by hauling overloaded hay trucks over it), and was recently repaired. The bridge over Trout Creek on RR 280 was severely damaged during a flood event, and took over a year to be repaired.

In order for these roads and bridges to be upgraded to withstand the volume of traffic and weights of heavy loads that the Poultry barn would bring, they would need to be upgraded and widened and at significant cost – Is Granum Colony prepared to foot the bill for the road and bridge upgrades that would be required, to ensure safe access for everyone? As Rate Payers, we DO NOT want to be paying the substantial tax increase that this would bring about. We also don't want to be stranded from town, because "oops, we took out the bridge, again".

Bottom line: The NRCB must deny this Application.

#### **4. FLOODING**

Flooding on Willow Creek has become a regular and well documented occurrence, and many years, we have experienced an inability to find an available route to town (Claresholm). All bridges were deemed compromised and unsafe to cross, or were under water themselves. Being unable to truck in grain, and truck out finished animals during flood season, will be of significant impact the operations of this feedlot.

Granum Colony is aware of the flooding concerns, as their Consulting Firm has admitted that the area of development is prone to flooding – as evidenced in Part 2, Page 7 of the Application.

Flooding and CFO's equates to widespread fecal contamination of nearby water sources, and land, and will be of negative impact to us as adjacent landowners, by jeopardizing our water sources. Again, we do not want our water sources compromised.

#### **5. DUST, NOISE, ODOR, FLIES, TRAFFIC**

There was no mention of any dust, noise, odor, or traffic studies that has been undertaken by Granum Colony to support their application. Yet, these are all of great concern, as they will have long lasting impacts on us as residents and landowners.

The road dust that the Poultry barn traffic would create is problematic to us as adjacent landowners and residents, as it is very hard on the lungs of calves and foals. We already battle a dust issue off of RR 280, we don't need any more.

The noise associated with the Poultry barn, the traffic including feed delivery trucks, all are impacts that us as adjacent landowners, and residents, are going to have to deal with, and will impact our quiet enjoyment of our property.

The odor and flies associated with a Poultry barn are of concern, especially the odor. Our house is within the odor dispersion plume considering the prevailing winds, we will be living with the odor of this Poultry barn 24 hours, 7 days a week. We will be inundated with flies, of which poses a health concern to our own livestock, as flies and other flying, biting insects are known disease carriers, especially with a number of equine diseases, such as EIA. The introduction of massive source of disease vectors to our area is of concern to the biosecurity of our own operation. We take that threat very seriously.

Not to mention, the safety risk we all know is going to be present – underage and unlicensed drivers running Colony trucks up and down our gravel roads. It is an accident waiting to happen.

As landowners, we have a right to quiet enjoyment of our property. The addition of this Poultry barn will take away our quiet enjoyment – and leave us with nothing but noise, dust, odor, flies and traffic in return.

Bottom line: The NRCB must deny this Application.

## **6. PROPERTY VALUE**

Properties comparable to ours, in our neighborhood, have recently sold in the \$850,000 - \$1.1 million range, to non-Colony buyers. With the rate with which Granum Colony is purchasing land in the area, we are already going to one day, be looking at a very limited buyers pool, if and when we decide to sell.

With a Poultry barn immediately next door, that will render our property worthless to non-Colony buyers - who is going to want to move in to a beautiful property with a Poultry barn next door? If not visually, the odor will be ever-present.

In the end, we will be forced to sell out to the Colony for, no doubt, much less than half it's worth. The Granum Colony currently owns over 60,000 acres in the MD of Willow Creek, they have many different and far more suitable options for their development than putting it on our doorstep.

Bottom line: The NRCB must deny this Application.

## **7. WATER SOURCING**

While water usage/sourcing for an CFO is not within the NRCB's jurisdiction, we are still expressing our concerns over where Granum Colony plans to source their water, as this letter is being sent to Alberta Environment and a number of other Provincial and Federal Government Departments and Agencies.

Our neighbourhood already has a significant issue with being able to source enough potable water for domestic and livestock use. Our 1994 drilled well (2.5 gpm at drilling) declined to less than 0.5 gpm in 2015, forcing us to explore for and drill a new well. We were fortunate to find and drill a new well, again, at 2.5 gpm. We manage that well very carefully, to ensure to not overuse it, so that it will last. Many of our neighbors have not been so lucky, and have had to resort to installing cistern's and hauling water. **THIS AREA DOES NOT HAVE AN ABUNDANCE OF GROUNDWATER**, and to think that this Poultry barn, feedlot, which ever species they apply for next, is going to pull how many 100,000s cubic meters of water each year from our water table, is frightening and maddening – how long do you think it will be before our wells are drained? Then what? Who's going to come and find us water the next time? WILL we even be able to find water?? Or do we just sell out to the Colony and move to town?

**We cannot state it enough: This application must be denied.**

## **CONCLUSION**

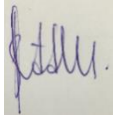
This proposed Poultry barn will negatively impact ourselves as landowners and residents by threatening the security of our water supply and sources, contaminating our water sources, taking away our quiet enjoyment of our property through noise, dust, odor and flies, increase the traffic on our local roads by an exponential amount, slash our property values and potential market.

If this proposed Poultry barn does achieve NRCB approval, I can assure you that we will hold both the NRCB and the Granum Colony (and heirs, successors, subsidiaries and successors in interest of both) wholly responsible to ANY and all impacts to our water supply, both surface (dugout) and well sourced, both in quality and quantity, to pre-approval levels. All costs and labor to ensure our water supply is maintained to the quality and quantity it is today, will be borne by NRCB and Granum Colony.

Additionally, we will hold both the NRCB and the Granum Colony (and heirs, successors, subsidiaries and successors in interest of both) wholly responsible for decrease in land value for our property. If our property value declines between now and any future date of sale, we will hold the NRCB and Granum Colony responsible to make up that difference in value, and the same shall be compensable to us as landowners to pre-application (2019) levels.

We trust that the NRCB will do the right thing, and deny this application.

**Respectfully submitted,**



Shelby Biddlecombe

On behalf of Eleanor Biddlecombe, Shelby Biddlecombe and Guy Biddlecombe  
Landowners at NE 36-11-28-W4M

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