Rimrock Feeders Ltd.

Box 5279 High River, AB T1V1M4 403-652-9970

kendra@korovafeeders.com

November 4, 2020

Laura Friend Manager, Board Reviews **Natural Resources Conservation Board** Laura.friend@nrcb.ca

Tel: 403-297-8269

Letter delivered by e-mail November 4, 2020

Dear Laura Friend,

RE: Board Review – Rebuttal to RFR submitted by Norman and Janice Denney

Please accept this letter as a rebuttal addressing concerns of Norman and Janice Denney regarding our NRCB grandfathered permit determination of livestock type at Rimrock Feeders at Section 5-19-29-W4M.

Mr. Karl Ivarson the inspection officer on our file did an exceptional job collecting all evidence to come to his determination. I will reference his review throughout this letter. I have added a few other items for the board to consider.

Below are the three items of Norman and Janice Denney letter that they challenged and our comments as a rebuttal. We also respond to Norman and Janice Denney's concerns throughout our response.

Abandonment – Western Feedlots and Rimrock Feeders had been in discussion to purchase the feedlot since Western decided to sell. It was Western Feedlots and Rimrock Feeders intention to see the feedlot full of cattle again but took some time to negotiate and come to a final offer. I think the High River community and Foothills County would agree, that the few years the feedlot was empty was noticeable for economic activity for the area. Now that the feedlot is back full of cattle, it has brought more economic activity for the area once again. We believe that CFO's bring much value to a community especially through an economic recession. This includes manure to fertilize the land for higher yields, value added agriculture that impacts grain, straw and silage sales, equipment utilization, employment, trades work, and community support/involvement. CFO's are a great benefit to a community and increase land values in the area. Rimrock and its owners are community driven and this is front of mind when we operate our business to try and reduce nuisance to our neighbours.

Public Notification – Karl Ivarson was very diligent in making sure sufficient public notification was done. This was evident by the number of letters that were submitted in response to the notice posting and letters mailed. We received phone calls from the county office, including the Councillor for our area Delilah Miller as they were getting many questions from the public about the grandfather determination. Between the letters that were sent out and the advertisement in the High River Times, this created much discussion within the community to give everyone the opportunity to provide evidence on the type of cattle fed at the feedlot. We are appreciative to all those that did provide evidence as this process is important to consider all evidence, so we come to the correct determination. It is important to Rimrock Feeders and its family that we follow NRCB regulations and we felt, since it wasn't clear the type of cattle, that it was our responsibility to request a grandfather determination



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from NRCB. As Norman and Janice Denney suggest, we are a responsible organization and continue to work with regulators to make sure we are following the regulations and be as proactive as possible to improve our operation.

Deemed Approval Capacity – Norman and Janice Denney provided a measurement from google maps to determine the square feet of Rimrock Feeders. They provided 2,400,000 square feet. We did the same measurement on google maps and came to 7,900,000 square. This gives 35,000 finisher cattle enough space based on NRCB guidelines posted on their website at:

https://www.nrcb.ca/public/download/files/97591 . We also want to clarify that feedlots tend to turn cattle 1.3-1.5 times per year, not the suggested 5.6 turns that Norman and Janice Denney suggested.

Should you have any other questions/concerns please don't hesitate to contact Doug Price at 403-809-5866 or Kendra Donnelly at 403-546-4392.

We appreciate your time in reviewing our rebuttal.

Sincerely,

Doug Price President

Rimrock Feeders Ltd.

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Kendra Donnelly Managing Partner Rimrock Feeders Ltd.