

To: Laura Friend

Subject: Re: NRCB Notice of Filed RFRs and Rebuttal Opportunity for G&S Cattle Ltd. RA21045

From: Kenneth and Sharon LeLacheur

Status: Directly Affected Party

Legal Land Description: 5-02-046-34-SW P-9920035 B- L-1

Municipal: [REDACTED] County of Wetaskiwin

Statement of Concern

The NRCB decision of September 13, G &S Cattle Ltd. RA21045 to deny the construction of a 4000 beef finisher confined feeding operation should stand. **A request for review should be denied.**

We agree with the decision, as outlined in the decision summary that the: “proposed CFO would pose materially negative and long-lasting effects on the community, We have also concluded that it would not be an appropriate use of the land.”

We are directly affected. We purchased our property twenty years ago for recreational use and as a retirement location. We understand that the County of Wetaskiwin is an agricultural area, and that there is a need for agriculture. What we did not anticipate was that a commercial business (G&S Cattle Ltd.) would come into the area, buying up multiple quarters of land and inflicting its demands on us and our community. Our community is not just people living and working within 1.6 kilometres of the proposed Confined Feeding Operation. Our community includes Pigeon Lake and the surrounding area with all its residents, visitors, services and stores within the County of Wetaskiwin.

We believe that the current rules and laws denying all of those listed above as directly affected status is unsupportable.

As individuals, we do not have the resources of a large corporation such as G&S Cattle Ltd. to hire legal representation, able to use nuanced wording to inflict bias into the request for the review of the NRCB decision.

We feel that the request for the review should be denied for the following reasons:

In its submission, G&S Cattle Ltd. stated “concerns about runoff and nutrient loading through manure application are not relevant to a permitting decision” These **are** major concerns and must be considered as this has a major impact on all those living, working and playing in the community members.

The corporation listed five specific reasons that the decision should be reviewed:

1. **Assessment of Community Effects and Land Use**

The information under this topic states that potential effects on Pigeon Lake have not been proven.

This is not true. The Pigeon Lake Watershed Management Plan has the scientific evidence.

Odour and nuisance concerns **do** have unacceptable negative impacts on the community. The owners of G&S do not live in the area, and while they will not be negatively impacted, those of us living in the area will be.

2. **Disregard for Established Principles and Processes**

The AOPA states that anyone outside of the 1.5 mile radius is “presumed” not to be affected. This does not stand up under scrutiny. The G&S submission stated that the decision was an “unreasonably narrow interpretation”. We do not agree with this statement. The public interest includes many people who live, work and play outside the 1.5 mile radius.

3. Misinterpretation of the Authority of the PLWMP

This is wilful blindness on the part of G&S Cattle Ltd. The PLWMP has worked diligently to protect Pigeon Lake as a living, recreational resource. To say that this work has not been proven, and is not a valuable resource is denying the science behind it.

4. Unfair Focus on the Concerns of Unaffected Persons

This is probably the most egregious of the G&S claims. The PLWMP **does** have the support of not only the counties involved, but also the vast majority of residents and visitors to Pigeon Lake. These people are affected by decisions made by the NRCB and their concerns must be included.

The statement “To do so unfairly favours the view of the Pigeon Lake Watershed Association at the expense of other community members” is not true. We fail to see that the concerns of the G&S Cattle Ltd., a large corporation with multiple land holdings, should take priority over the large numbers of community members who live and work in the area.

5. Improper Reliance on the PLWMP

“...the Decision prioritizes a policy objective of achieving future statutory provisions over actual statutory provisions now in effect.” We disagree with this, as believe that the decision was the correct one that will protect the County of Wetaskiwin, Pigeon Lake and the Pigeon Lake community in the future.

Under the title “Effects of the Decision on the Applicant”, this was part of the summary.

“Beyond the impacts to G&S' business and the use of its farmland, the Decision also affects G&S' current and potential future employees, who will benefit from employment opportunities created or sustained by the proposed CFO. Approval of the CFO will result in G&S consuming additional goods and services, will further benefit the local economy, and will result in the production of a commodity that is valued internationally.”

This statement shows the true, dismissive nature of the G&S Cattle Ltd. They are a corporation set up for profit, and while they may provide employment for a small number of people, who may or may not live in the community, they dismiss the concerns of thousands of people, who actually do live, work and play in the area. This CFO would negatively impact this community, and will be a detriment to the local economy.

We respectfully request that the NRCB deny G&S Cattle Ltd. Request for the review of its decision.

Ken and Sharon LeLacheur