



**Decision Report PB24006 for  
Grandfathered (Deemed) Permit Determination  
under the  
*Agricultural Operation Practices Act*  
Daniel Brousseau (DB Farms Ltd.)  
SE-20-60-09-W4**

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## **1.0 Introduction and background**

This document sets out the written reasons for my determination of the livestock capacity and type in a deemed permit under the *Agricultural Operation Practices Act* (AOPA). The subject of the determination is a beef operation located on SE-20-60-09-W4 (this quarter section will be referred to as “the site”). The site is located in the County of St. Paul, approximately 3.5 kilometres southeast of the Hamlet of Mallaig. The process of ascertaining livestock capacity and livestock type under a deemed permit is known commonly as a “grandfathering” determination.

On September 3, 2024, Brittany Brousseau on behalf of DB Farms Ltd. contacted the Natural Resources Conservation Board (NRCB) and requested that the NRCB conduct a grandfathering determination for their beef confined feeding operation (CFO). The grandfathering determination was requested at SE-20-60-09-W4 and it claimed 2,000 beef feeders (Appendix A). The CFO operates under the corporate name of DB Farms Ltd. and the land is owned by Daniel Brousseau.

Under section 18.1(1)(a) of AOPA, CFOs that existed (even without a municipal development permit) on January 1, 2002, are grandfathered.

It is therefore necessary for me to determine:

1. Was there a “CFO” on this site on January 1, 2002?
2. Was the CFO above the permitting thresholds under AOPA on January 1, 2002?
3. If so, what was the footprint on January 1, 2002?
4. What were the structures on January 1, 2002?
5. What, if any, permits or licences did the operation hold?
6. What category(ies) of livestock was the CFO confining and feeding, or permitted to confine and feed? What type(s) of livestock in that category (e.g. calves, feeders, finishers)? What livestock numbers were permitted or being held for each type of livestock?
7. What was the capacity of the structures to confine livestock on January 1, 2002?
8. Is the claimed capacity within a reasonable range of the physical capacity on January 1, 2002?

For the reasons that follow, I concluded that under section 18.1 of AOPA, the CFO at SE-20-60-09-W4, currently owned by Daniel Brousseau and operated by DB Farms Ltd., has a deemed approval with the capacity for 2,000 beef feeders. The CFO has not been abandoned and the deemed NRCB permit under AOPA is still valid today.

To ensure transparency with AOPA and consistent decision-making, a complete and thorough investigation was conducted to address the questions listed above, ensuring that all relevant aspects of the operation were considered in making a formal grandfathering determination.

## **2.0 Context and process**

### **2.1 Legal context**

Under section 18.1(1)(a) of the *Agricultural Operation Practices Act* (AOPA), the owner or operator of a confined feeding operation that existed on January 1, 2002, for which a development permit was not issued by the municipality is deemed to have been issued a permit

under AOPA. The capacity allowed by a deemed permit is the capacity of the enclosures to confine livestock at the CFO on January 1, 2002 – section 18.1(2)(a) of AOPA.

The term “capacity” refers to a CFO’s livestock numbers, or manure storage capacity, not to the scope of the CFO’s facilities. The term “deemed capacity” refers to the maximum number of livestock, or maximum volume or tonnage of manure storage, allowed by a CFO’s deemed permit as determined under section 18.1(2) of AOPA.

The question of whether there was a “confined feeding operation” on this site on January 1, 2002 may turn on the definition of “CFO” in AOPA. In AOPA, “confined feeding operation” is a defined term in section 1(b.6):

*“confined feeding operation” means fenced or enclosed land or buildings where livestock are confined for the purpose of growing, sustaining, finishing or breeding by means other than grazing and any other building or structure directly related to that purpose but does not include ... livestock seasonal feeding and bedding sites....*

To be grandfathered, a CFO must have been at or above AOPA threshold numbers on January 1, 2002. The Part 2 Matters Regulation under AOPA identifies the threshold to require a permit for beef feeders is 200 animals for a registration and 500 animals for an approval.

The Administrative Procedures Regulation under AOPA includes section 11 governing deemed permit investigations. Section 11(1) of the Regulation states that:

*11(1) At the request of an owner or operator for a determination related to a deemed permit under section 18.1 of the Act, or in response to a complaint where a determination of the terms or conditions or existence of a deemed permit is required, an inspector shall conduct an investigation to determine the capacity of a confined feeding operation or manure storage facility*

- (a) that was in place on January 1, 2002, or*
- (b) that was constructed pursuant to a development permit issued before January 1, 2002.*

The NRCB has formalized grandfathering decisions by adopting processes set out in section 11 of the Administrative Procedures Regulations under AOPA and through the NRCB Operational Policy 2023-01: *Grandfathering (Deemed Permit)*. These documents provide the framework to establish the facts and the scope of the grandfathering determination process.

## **2.2 Standard of proof**

Section 11 of the Administrative Procedures Regulation under AOPA states that an inspector shall conduct an investigation to determine capacity of a CFO in place on January 1, 2002. Grandfathering determinations require findings of fact. Whether a CFO existed on January 1, 2002, above threshold, is a question of fact. Similarly, what category and type of livestock, and what capacity the CFO had on January 1, 2002 are also questions of fact.

If not otherwise specified in legislation, the standard of proof in a civil administrative proceeding like this is a “balance of probabilities”—that is, whether a relevant fact is more likely than not to be true.

## 2.3 Flexible approach to grandfathering date

Section 18.1 of AOPA focuses on facts as they existed on the precise grandfathering date of January 1, 2002. However, I generally sought evidence as to the type of livestock and the livestock capacity at the operation between 2000 and 2004 (See Operational Policy 2023-1: *Grandfathering (Deemed Permit)*, part 6.0). Considering the operation for at least two years before and two years past the January 1, 2002, grandfathering date seemed useful because witnesses might not remember what occurred on the exact date of January 1, 2002 and documents may not have the exact date. Also, considering how an operation functioned over a range of dates might shed additional light on how the operation functioned on a given day within that range.

The NRCB generally uses a pragmatic and flexible approach toward applying the January 1, 2002 grandfathering date. This approach is reasonable because a more rigid or stricter application of the January 1, 2002 grandfathering date could lead to unfair results if, for example, an operation happened to have emptied its enclosures on January 1, 2002, or was half-way through rebuilding or constructing the enclosures on that date, or had shut down temporarily due to a short-term market crises. Thus, the 2000 to 2004 range was meant to generate sufficient evidence to apply this pragmatic and flexible approach.

## 2.4 Notice

Under Part 2 Matters Regulation of AOPA, the municipality where the CFO is located is an affected party (see section 5 of the regulation). As such, the NRCB provided notice of the grandfathering investigation to the County of St. Paul and invited comments. The NRCB also provided notice of the grandfathering investigation to M.D. of Bonnyville and invited comments as the M.D. of Bonnyville falls within the 1.0 mile notification radius. The NRCB also sent information to Alberta Environment and Protected Areas and Right of Way/Easement Holders.

I sought neighbours' perspectives on the factual questions of capacity and type of livestock being confined and fed on January 1, 2002. I wanted to collect relevant historical information from those who may have lived in the area around that date. Notice is required in section 11(2) of AOPA's Administrative Procedures Regulation. Before determining a deemed approval for an operation that was in place on January 1, 2002, the NRCB inspector is required to provide notice to those parties "who would be entitled to notice under section 19(1)" of AOPA for a new CFO with the same capacity.

In this case, the claimed capacity is 2,000 beef feeders, which puts the distance for affected persons entitled to notice under section 19(1) of AOPA at 1.0 mile. The distance is set out in section 5 of the Part 2 Matters Regulation.

On June 10, 2025, notice of the grandfathered (deemed) permit determination request was published in the *St. Paul Journal* and the *Lakeland Today* newspaper. In the notice, I advised of the claim by DB Farms Ltd., for a deemed permit for 2,000 beef feeders, and I invited the public to provide written submissions related to the facilities, and capacity and type of livestock produced by the CFO on January 1, 2002. I also invited the public to apply for status as directly affected parties. The deadline for written submissions was July 9, 2025.

In addition, on June 4, 2025, 14 notification letters were sent to people who (according to the County of St. Paul) reside on or own land within a 1.0 mile radius of the operation who might have relevant information as to the capacity and type of livestock that the CFO produced around

January 1, 2002. The notification letters included information similar to that in the newspaper notice.

On July 7, 2025, 4 notification letters were sent to people who (according to the M.D. of Bonnyville) reside on or own land within a 1.0 mile radius of the operation who might have relevant information as to the capacity and type of livestock that the CFO produced around January 1, 2002. The notification letters included information similar to that in the newspaper notice. The deadline for submissions from these people was August 5, 2025.

The NRCB published notice of the grandfathering determination on its public website at [www.nrcb.ca](http://www.nrcb.ca), as well as the grandfathering determination request form submitted by Brittany Brousseau.

### **3.0 Evidence**

#### **3.1 Information from operator**

Brittany Brousseau provided two documents to support the claimed grandfathered capacity of 2,000 beef feeders.

The first document was a portion of the appendix from this property's sales package when it was for sale (no date, but it was from approximately 2004 or 2005) (Appendix B). On page 8 of this appendix, it describes the property:

- 1) Livestock Processing Building: Section 5 states that there is a livestock processing building and direct access to this building is provided to the corrals and holding areas for the livestock.
- 2) Grain Bins: Section 6 explains the grain storage system including an area with smaller hopper bottom bins and a grain grinder unit.
- 3) Feedlot Facility: Section 7 discusses this feedlot area and describes the pen infrastructure ("post and plank construction with some metal pipe, alleyways for access, and feed bunk areas"). This section also makes note that the pens have direct access to a weigh scale with an 80,000 lb capacity.
- 4) Site improvements and Services: Section 8 describes a secondary driveway for the use of livestock delivery trucks to provide direct access to the feedlot pen area.

These four factors listed above support the claim that this site was operating as a CFO.

The second document was a letter dated February 1, 2005 from the County of St. Paul (Appendix C). This letter states that "in researching this particular CFO, our records indicate that there were not permits issued for this site". The letter also states that "all operation in existence prior to January 1, 2002, that do not hold a permit with a municipality are considered to have an approval under AOPA". Prior to 2002 some municipalities did not issue permits for CFOs, therefore the fact that there is no municipal development permit does not necessarily mean there was no CFO there in 2002.

On June 6, 2025, NRCB Approval Officer Nathan Shirley and I met with Brittany Brousseau at the site. Brittany provided the following information about the operation:

- Daniel Brousseau purchased the feedlot in 2005 and has used it to feed cattle since then
- The feedlot was last used in 2022, and at this time the majority of the pens were full
- The locations of the feed bunks for pens one through seven
- Handing and sorting pens are located east of Pen #7

- The catch basin is located west of Pen #4

During this inspection, I noticed that the feedlot pens were constructed from permanent infrastructure and there is fence line feeding panels with concrete feed aprons installed.

### **3.2 Information from municipality**

Under the Part 2 Matters Regulation under AOPA, the municipality where the CFO is located is an affected party (see section 5 of the regulation). In addition, a municipality whose boundary falls within notification radius of a confined feeding operation is an affected party (see section 5 of the regulation). As such, the County of St. Paul and the M.D. of Bonnyville are both affected parties and are also both directly affected parties in this deemed permit determination, as they would be if this were an application for an approval today.

On October 16, 2024, the County of St. Paul provided me with a 2002 aerial image of SE-20-60-09-W4 (Appendix D). This aerial image shows the footprint and facilities of the CFO that existed on or around January 1, 2002.

On July 2, 2025 I received a written statement from the County of St. Paul in regards to this operation (Appendix E). In this written statement the County of St. Paul stated that they have no objection to the NRCB approving the request that SE-20-60-09-W4 is a grandfathered site.

On July 4, 2025 I received a written statement from the M.D. of Bonnyville in regards to this operation (Appendix F). In this written statement the M.D. of Bonnyville stated that they have no concerns with this operation.

### **3.3 Evidence from neighbours**

The newspaper notice in the *St. Paul Journal* and the *Lakeland Today* newspaper, as well as the notification letters mailed to residents and owners within 1.0 miles of the CFO, invited people to provide written statements related to the capacity and type of livestock being confined by the CFO on January 1, 2002. I did not receive any written responses from neighbouring landowners or residents.

### **3.4 Evidence from other agencies**

On June 10, 2025 notification letters were sent to Alberta Environment and Protected Areas and to Right of Way/Easement Holders

On June 23, 2025 I received a response from Alberta Environment and Protected Areas Compliance Division (Appendix G). In their response, Alberta Environment and Protected Areas stated that they had no concerns under their legislation related to this operation's activity.

## **4.0 Analysis and Findings**

### **4.1 Was there a CFO on site on January 1, 2002**

The aerial image from 2002 (Appendix D) shows a clear footprint of the site and the footprint is typical of that of a CFO.

My site inspection on June 6, 2025 confirmed that the site looked like a feedlot operation and had all of the facilities stated in the appendix from the property's sales package (Appendix B).

Based on the evidence I have, it is more likely than not that the enclosures were part of a “CFO” on January 1, 2002. There is no evidence that the operation was anything other than a beef feedlot.

For reasons of resources and expediency, the NRCB has developed a more streamlined grandfathering process. For feedlots in particular, the NRCB is moving away from interviewing operators, neighbors and other affected parties to collect detailed evidence of the livestock type and capacity of the operation in 2002.

Instead, the NRCB relies more on public notifications and information from directly affected parties to invite relevant input. If an operator can provide basic records to show likelihood that they were a CFO in 2002 (e.g. photos, sales and inventory records) and there is no contrary evidence from directly affected parties, NRCB moves more quickly to provide a decision on the grandfathering request. The NRCB will still do a verification check to ensure the livestock numbers and type claimed would fit in the 2002 footprint.

## **4.2 CFO footprint and structures**

The evidence set out above and in the 2002 aerial imagery (Appendix D) shows that the footprint of the CFO (not including the seasonal feeding pen) has not changed since 2002. My June 6, 2025 site inspection also confirmed that the CFO footprint has not changed. I conclude that the footprint of the CFO today is the same footprint that existed on January 1, 2002.

Based on this evidence, I have concluded that on January 1, 2002, this CFO consisted of the following manure collection areas (MCAs). Because these measurements were taken on Google Earth 2024 aerial imagery, they are approximate measurements as some areas of the aerial image were difficult to see. See Appendix H for pen footprint measurements.

- Pen 1 – 66,379 ft<sup>2</sup>
- Pen 2 – 75,773 ft<sup>2</sup>
- Pen 3 – 65,900 ft<sup>2</sup>
- Pen 4 – 18,594 ft<sup>2</sup>
- Pen 5 – 40,149 ft<sup>2</sup>
- Pen 6 – 49,997 ft<sup>2</sup>
- Pen 7 – 24,962 ft<sup>2</sup>
- Catch basin – 27,936 ft<sup>2</sup>

This CFO also consisted of the following ancillary structures:

- Handling & sorting pens

See Appendix I for a map of all MCAs, and ancillary structures and seasonal feeding enclosures.

## **4.3 Livestock type**

As to livestock type, the property sales package (Appendix B) notes that the pens “provide for a total livestock capacity of 1,000 to 1,500 head depending upon the animal size”. This is the only supporting material that was provided for livestock type.

## **4.4 CFO livestock capacity and reasonable range of physical capacity**

The *Grandfathering (Deemed Permit)* Policy at 6.3.3 provides:



*If there is no MD permit, then field services staff determine the capacity of the enclosures to confine livestock (“physical capacity”) under section 18.1(2)(a) of AOPA.*

Importantly, it is the capacity to confine feed, rather than the actual number of confined livestock, that determines capacity for this deemed approval.

I took steps to verify if the claimed capacity of the feedlot (2,000 beef feeders) would have “fit” into the feedlot in 2002. As the footprint of the feedlot has not changed since 2002, I used Google Earth aerial imagery from 2024 to verify the livestock capacity.

A useful tool to verify the evidence is Technical Guideline Agdex 096-81 *Calculator for Determining Livestock Capacity of Operations as They Existed on January 1, 2002* (see NRCB Operational Policy 2023-1: *Grandfathering (Deemed Permit)* at 6.3.2).

The guideline says:

Space allocations for beef cattle are based on pen size, bunk length for full feed, and bunk length for limited feed. All three factors should be considered. The bunk length is often the deciding factor for large pen spaces.

The guideline sets out different calculations for northern or southern Alberta – in this case, the CFO is in northern Alberta. Therefore, according to this guideline, pen space is 200 ft<sup>2</sup>/animal, full feed bunk space is 0.8 ft/animal and limited feed bunk space is 2.0 ft/animal.

The formulas for beef feeder calculations in northern Alberta include:

- Pen Calculated Animal Number = Pen Area (ft<sup>2</sup>) ÷ 200 ft<sup>2</sup>/animal
- Bunk Space Full Feed Calculated Animal Number = Bunk Length (ft) ÷ 0.8 ft/animal
- Bunk Space Limited Feed Calculated Animal Number = Bunk Length (ft) ÷ 2.0 ft/animal

I used Google Earth aerial imagery from 2024 to determine the approximate area of the seven pens at this site. The total calculated pen area was approximately 341,754 ft<sup>2</sup> (Appendix H). I used the same aerial imagery to determine the approximate length of the feed bunks. The total bunk length for these seven pens is approximately 1,595 feet.

Therefore, by using the calculated pen areas and bunk lengths for this site (Appendix H), Agdex 096-81 suggests that for this site, the pen footprint space would allow a total capacity of 1,709 beef feeders. The full feed bunk space would allow a total capacity of 1,994 beef feeders and the limited feed bunk space would allow a total capacity of 798 beef feeders.

Based on this analysis, the claimed capacity of the feedlot (2,000 beef feeders) is close to the Agdex 096-81 calculated capacity range of approximately 798 to 1,994 beef feeders. Therefore, the capacity of this CFO is 2,000 beef feeders and this is within a reasonable range of the physical capacity of the CFO on January 1, 2002, as calculated above.

#### **4.5 Was the CFO above AOPA threshold on January 1, 2002?**

The AOPA threshold number for an approval for beef feeders is 500+ animals. Given the analysis above, I find that this CFO had capacity for 2,000 beef feeders, which is above the threshold. Accordingly, the CFO's livestock capacity was above threshold on January 1, 2002 and it has a deemed permit.

As discussed in section 4.1 the NRCB has developed a more streamlined approach to the grandfathering process.

## **5.0 Affected persons and directly affected parties**

Section 11(5) of the Administrative Procedures Regulation under AOPA requires that an inspector's decision report on a grandfathered (deemed) permit determination include reasons on whether affected persons who made a submission are directly affected parties.

Directly affected parties may have their response considered in a grandfathering determination and may submit a request to the NRCB's Board for a review of a grandfathering determination. If not directly affected, they may not have these options.

Affected persons in this determination were the municipality in which the operation is located (the County of St. Paul), any municipalities within the 1.0 mile notification distance (M.D. of Bonnyville), and all neighbours who own or occupy land within the 1.0 mile notification distance. By proxy through section 19 of AOPA, these are determined by section 5 of the Part 2 Matters Regulation.

"Directly affected parties" are typically a subset of "affected persons." Under section 19(6) of AOPA, the applicant for an approval and municipalities that are "affected persons" are automatically directly affected parties. As such, DB Farms Ltd., Daniel Brousseau, the County of St. Paul and the M.D. of Bonnyville are directly affected parties.

In deciding who else would be considered a directly affected party, I referred to the NRCB's Approvals policy section 7.2.1 paragraph 2 which states "*The NRCB presumes that persons who reside on or own land within the notification distance also qualify for directly affected party status, if they provide written response to the notice within the posted response deadline.*"

In this case, no neighbouring landowners within the notification distance submitted a written response, therefore there are no additional directly affected parties.

## **6.0 Status of deemed permit today**

### **6.1 Abandonment**

While a grandfathering determination is limited to a point in time – January 1, 2002 – the NRCB also takes this opportunity to assess the validity or status of a deemed permit, today. In other words, for a permit that is deemed under AOPA, does that same permit exist with the same terms in 2025? This assessment may be useful to provide certainty to prospective buyers, sellers or lenders, municipalities, regulators (such as the NRCB), and the owner and operator of the CFO.

In a decision concerning a grandfathered (deemed) permit determination (RFR 2020-04 *Stant Enterprises Ltd.* at pg. 4), the NRCB Board implied that where 18 years have passed since the time window used in a grandfathering, it may be appropriate to evaluate a question of abandonment. If a facility were abandoned, that might invalidate its deemed permit today.

The NRCB's Operational Policy, *2016-3 Abandonment and Permit Cancellations (updated April 23, 2018)* guides how to assess whether an operation or facility is abandoned. The policy also directs the approval officer (or inspector) to consider:

- the CFO's current use, if any
- the CFO's current condition
- what, if any, steps are being taken to keep the CFO's facilities in condition such that they could resume being used for livestock management without major upgrades or renovations
- when the CFO stopped being used, and the owner's reason for stoppage
- whether the operation changed ownership during the period of disuse
- the owner's reason for ceasing or postponing use and owner's intent with respect to future use of the CFO
- the value of CFO facilities (independent of their permitted status) and the cost of reconstructing them if reconstruction is needed.

From my observations, information obtained during my site inspection, I was able to assess the status of the site.

- The CFO facilities stopped being used to confine livestock within the last three years.
- There was no indication of any intent not to operate as a CFO in the future.
- The CFO has not changed ownership during the last three years of disuse.
- During my site inspection on June 6, 2025, I observed permanent infrastructure consisting of permanent pens constructed which included wind walls, automatic waterers, and fence line feeding panels with concrete aprons.
- Most of the CFO facilities are in good condition. Some wooden fences throughout the CFO will require some maintenance. The CFO facilities have not reached the end of their useful life.
- Based on my observations of the conditions of the site, the CFO can continue being used without any significant upgrades or renovations.

Having considered the evidence and issues that relate to assessing abandonment, I am of the opinion that the CFO at SE-20-60-09-W4 is not abandoned.

## 6.2 Disturbed liner

The *Grandfathering (Deemed Permit)* Policy states that facilities that are deemed to have an AOPA permit retain that deemed status only as long as the essential conditions of those facilities remain as they were on January 1, 2002.

If an operator substantially changes the liner of a grandfathered manure storage facility or collection area, then the policy objective behind grandfathering that liner is erased. In addition, as a general rule, if a deemed facility is changed in a way that constitutes "construction" under AOPA, including the NRCB's interpretation, then that facility will lose its deemed status. This rule applies even where the "construction" does not alter the existing liner (e.g. but where capacity of manure storage or collection increases). Further explanation of what constitutes "construction" is provided in NRCB Operational Policy 2012-1: Unauthorized Construction, and Livestock Pen Floor Repair and Maintenance Fact Sheet.

In this case, there is no information that any liners or protective layers for the CFO facilities were disturbed in a way that would constitute "construction" and would invalidate the deemed permit.

## 7.0 Conclusion

Having reviewed all the evidence listed above, I have determined that on January 1, 2002, the CFO at SE-20-60-09-W4, currently owned by Daniel Brousseau,

1. likely existed on January 1, 2002
2. was likely above AOPA permitting thresholds for beef feeders on January 1, 2002
3. has the same footprint (for confining beef animals) today as it did on January 1, 2002
4. has the same structures (for confining beef animals) today as it did on January 1, 2002
5. did not have a development permit issued prior to January 1, 2002 from the County of St. Paul
6. had enclosures with the physical capacity to confine 2,000 beef feeders on January 1, 2002
7. claimed capacity of 2,000 beef feeders is within reasonable range of the physical capacity of beef feeders on January 1, 2002.

Therefore, under section 18.1 of AOPA, the owner or operator of the CFO has a deemed approval with the capacity for 2,000 beef feeders.

I have determined that the CFO has not been abandoned, has not had any of its liners disturbed, and the deemed NRCB permit under AOPA is still valid today. Please see Deemed (Grandfathered) Permit PB24006.

Furthermore, I conclude that the only directly affected parties of this decision are: Daniel Brousseau, DB Farms Ltd., the County of St. Paul and the M.D. of Bonnyville.

September 12, 2025

(Original signed)

Cathryn Thompson  
Inspector

## **8.0 Appendices**

- A. Grandfathering Determination Request to NRCB (September 3, 2024)
- B. Appendix from property sales package (no date but it was from approximately 2004 or 2005) (supplied by Brittany and Daniel Brousseau)
- C. February 1, 2005 County of St. Paul Letter (supplied by Brittany and Daniel Brousseau)
- D. 2002 Aerial Imagery (supplied by the County of St. Paul on October 16, 2025)
- E. Response from the County of St. Paul, July 2, 2025
- F. Response from M.D. of Bonnyville, July 4, 2025
- G. Alberta Environment and Protected Areas Response, June 23, 2025
- H. Livestock Capacity Calculations (per Agdex 096-81)
- I. May 2024 Google Earth Aerial Imagery (labelling done by Cathryn Thompson)

## Grandfathering Determination Request

Request under the *Agricultural Operation Practices Act* (AOPA) for a grandfathering determination for a confined feeding operation (CFO), manure collection area (MCA), or manure storage facility (MSF)

<b>NRCB USE ONLY</b>	NRCB Grandfathering Number <b>PB24006</b>	Date Stamp <b>NRCB APPLICATION SEP 03 2024 RECEIVED</b>
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### CONTACT/OWNER INFORMATION

Name of owner: <b>Daniel Brousseau</b>	Corporate Name (if applicable): <b>DB FARMS LTD.</b>	
Name of person making request: <b>Brittany Brousseau</b>		
Address: (Street/P.O. Box) <b>PO Box 853</b>		
City/Town: <b>ELK POINT</b>	Province: <b>AB</b>	Postal Code: <b>T0A 1A0</b>

### LOCATION FOR WHICH GRANDFATHERING DETERMINATION IS REQUESTED

Legal Land Description: <b>SE-20-100-R9-W4</b>	(Qtr-Sec-Twp-Rg-W Mer)
County/Municipal District: <b>COUNTY OF ST PAUL #19</b>	
Is the person making the request the registered landowner? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If no, please attach letter of consent signed by all landowners)	
Does this legal land location have an existing permit(s) for CFO facilities? (e.g. municipal development permit.): <input type="checkbox"/> Yes (if yes please provide a copy) <input checked="" type="checkbox"/> No Permit(s) #:	

### Claimed Grandfathered Livestock Capacity (Capacity of the enclosures On January 1, 2002)

Livestock category and type	Claimed grandfathered livestock capacity
BEEF CATTLE	FEEDERS 2000 <del>-backgrounding</del>

### Claimed Grandfathered Facilities (On January 1, 2002)

Facility Name	Dimensions Length x width (x depth as applicable) (m)	Description of management of the facility (Seasonal use, movement of livestock, type of livestock etc.)
Feedlot	280m x 240m	seasonal.



# Grandfathering Determination Request



**Information to support grandfathering determination request:** (Provide all relevant information to support the grandfathering claim. This can include, permits issued prior to January 1, 2002, records supporting the claimed capacity, photographs, details of facilities used to confine livestock, site layout plan, etc. Attach pages as required.)

Types of Records for Years 2000-2004	Yes	No	Comments
Aerial imagery ( <i>old farm photos</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Photographs ( <i>personal photos taken of animals/facilities</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Livestock Purchase Records ( <i>auction market receipts</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Livestock Sales Records ( <i>auction market receipts</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Financial Records ( <i>Taxes</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Feed, Straw, Mineral Purchase Records	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Government Support Program Records ( <i>GRIP, NISA</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Premises Identification Registration Records	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Quota Records	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Veterinary Records	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Manifests	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Calving/Farrowing/Lambing etc. Records	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Livestock Health Records ( <i>records of livestock treatments/vaccinations</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Purchases of Livestock Holding/Handling Equipment ( <i>poultry cages, dairy cow beds/stalls, farrowing crates</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Testimonies from Employees or Family Members ( <i>that worked on the operation in 2002-2004 and could be contacted now</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Building and Construction Records ( <i>concrete bunks, buildings, sheds, slab fences, barns, waterers, etc.</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Any Diaries, Journals or Daily Logs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

PURCHASED MARCH 2005. From  
the bank as a foreclosure.  
Financed thru AFSC - ST. PAUL, AB.

# Grandfathering Determination Request



## REQUEST DISCLOSURE

I acknowledge that this information is collected under the authority of the *Agricultural Operation Practices Act*, is subject to the provisions of the *Freedom of Information and Protection of Privacy Act*, and shall be deemed public unless the NRCB grants a written request that certain sections remain private.

I, the owner, or agent of the owner, have read and understand the statements herein and acknowledge that the information provided in this application is true to the best of my knowledge.

AUG 29/24  
Date of signing

[Redacted Signature]  
Signature

DB FARMS LTD  
Corporate name (if applicable)

Brittany Brousseau  
Print name

**This contact information is only for NRCB, municipal, and referral agency use, and is not for public disclosure.**

### Owner Contact Information

Name: <u>Daniel Brousseau</u>		Corporate Name (if applicable): <u>DB FARMS LTD</u>	
Contact Numbers	Business:	Cell: <u>[Redacted]</u>	Home:
Email: <u>[Redacted]</u>			

### Person (Other than Owner) Requesting the Determination Contact Information (if applicable)

Name: <u>Brittany Brousseau</u>		Relationship to Owner: <u>spouse / partner</u>	
Contact Numbers	Home:	Cell: <u>[Redacted]</u>	
Email: <u>[Redacted]</u>			



ADDENDA

ADDENDUM A: Photocopy of the Certificates of Title.

ADDENDUM B: Photographs of the Subject Property, November 9, 2004.  
(Inspection Date).

ADDENDUM C: Canada Land Inventory - Soil Classes.

ADDENDUM D: Assessment Information.

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improvements. Some economic obsolescence is necessary due to a reduced buyer demand for such a developed agricultural property that provides for a reasonable value residence. Residential improvement is of basic design and assumed to be reasonably well maintained and requires little, if any, repair. A higher level of depreciation would be a necessity of the buildings and site improvements that relate to the livestock operation, feedlot facility that is currently vacant and unoccupied. Limited market demand for that type of livestock facility must be noted and considered with respect to a contributory value. Applied depreciation level of [REDACTED] and greater is made for most of the out buildings and the site improvements. These levels of depreciation will vary somewhat for the indicated buildings and site improvements contained on the Subject. Writer has applied an estimated depreciated value for some of the specific outbuildings with services and amenities.

Subject Parcel A - S.E. 1/4 Section 20-60-9-W4

<u>Buildings and Site Improvements Description</u>	<u>Reproduction/ Replacement Cost New</u>	<u>Estimated Depreciated Value</u>
1) Partial Two Storey Residence:		
Main Level - 1,200 sq.ft. @ [REDACTED]		
Upper Level - 792 sq.ft. [REDACTED]		
Basement Development - 672 sq.ft. [REDACTED]		
Attached Garage - 528 sq.ft. @ [REDACTED]		
Sunroom - 240 sq.ft. [REDACTED]		
Attached Deck/Concrete Patio = [REDACTED]		
Total:	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]
2) Garage/Storage Shed:		
1,215 sq.ft. [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]
3) Shop/Shed:		
1,025 sq.ft. [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]
4) Storage Sheds and Other Outbuildings =	[REDACTED]	[REDACTED]
5) Cattle Processing Building With Specialized Equipment =	[REDACTED]	[REDACTED]
6) Grain Bins (Three); Hopper Bottom Bins and Grinding Unit =	[REDACTED]	[REDACTED]
7) Site Improvements (Livestock Corral, Services and Amenities) =	[REDACTED]	\$ [REDACTED]
8) Site Improvements and Services =	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]

## SALIENT PROPERTY INFORMATION AND CONCLUSION:

Land Description:	<p>Parcel A - S.E. 1/4 Section 20-60-9-W4 containing 160 acres (64.7 hectares), more or less in the Certificate of Title No. 862 042 808 A, dated February 27, 1986. Excepting thereout all Mines and Minerals.</p> <p>Parcel B - S.W. 1/4 Section 21-60-9-W4 containing 161 acres (65.2 hectares), more or less in the Certificate of Title No. 862 042 808, dated February 27, 1986. Excepting thereout all Mines and Minerals.</p>
Registered Owners:	<p>Joffre Alphonse Dargis and Denise Laurette Dargis (Joint Tenants).</p>
Encumbrances:	<p>Parcel A - Certificate of Title each contains two encumbrances, an Utility Right of Way (Registration No. 792 085 118 ) by ICG Utilities (Plains-Western) Ltd. for natural gas service to the Subject Property and building site with an effect upon the market value; a Mortgage (Registration No. 012 059 011) by Alberta Treasury Branches for financial related matters with no effect upon the market value.</p> <p>Parcel B - Certificate of Title contains one encumbrance, a Mortgage as indicated previously in Subject Parcel A.</p> <p>See a photocopy of both Certificates of Title at Addendum A hereto.</p>
Purpose of Appraisal:	<p>Purpose of the appraisal is to estimate the "market value", or most probable selling price of the fee simple interest in the cited parcel of land, excepting thereout all Mines and Minerals, hereinafter referred to as the "Subject Property" at the effective date.</p> <p>Term "market value" has many connotations and for the purpose of the valuation herein, is considered synonymous with "most probable selling price". An estimate of most probable selling price of a property is based upon the prediction of <u>future</u> benefits likely to accrue from that property. It is the price at which the property would most probably sell if exposed to the market for such property for a reasonable period of time, under market conditions prevailing at the date of valuation.</p> <p>Valuation Report has been completed according to the requirements of the Appraisal Institute of Canada with reference to the Canadian Standards (CUSPAP) effective January 1, 2004, as revised. Marketing time period, is as stated, 6 months to 1 year (or greater for agricultural property). Sale is basis financing as cash or the equivalent of cash to a mortgage, say between 50 and</p>

75 percent of the appraised value or the purchase price, whichever is lower. Property is to be valued as varied improved property for a specialized agricultural use with extensive buildings and site improvements.

**Highest and Best Use:**

Highest and Best Use is defined in Real Estate Appraisal Terminology (1981 Printing, Page 126) which states Highest and Best Use as: "that reasonable and probable use that would support the highest present value, as defined, as of the effective date of the appraisal. Alternatively, that use, from among reasonably probable and legally alternative uses, found to be physically possible, appropriately supported, financially feasible and which results in highest land value."

Subject Parcels A and B are located in an area where there is extensive agricultural use for properties, while there are some properties that contain quality building improvements for both residential and intensive agricultural use. Subject Property is located in an area where land parcels are varied as to the cultivatable land area to be used for agricultural production. Some parcels have buildings and site improvements for a residence and outbuildings for an agricultural use. Land parcels with predominant native tree cover are desirable for recreational use or perhaps as country residential type of property with minimal agricultural productivity.

Subject Property has good land base for an intensive agricultural use complete with buildings and site improvements contained thereon. A diversified agricultural use is indicated for Subject Parcel A as improved with buildings and site improvements for a specialized agricultural use and Subject Parcel B as vacant land.

Highest and Best Use for the Subject Property would be for a continued agricultural use, while buildings and site improvements on Subject Parcels A and B relate to both residential use and a specialized agricultural use (Subject Parcel A) for livestock as a feedlot production facility.

**Land Use:**

Agricultural District.

**Municipal Authority:**

Parcel A - County of St. Paul;  
Parcel B - Municipal District of Bonnyville.

**2004 Assessment:**

Parcel A:

Land, Buildings and Site Improvements - [REDACTED] (Taxable - [REDACTED])



Parcel B:

Land - [REDACTED]

2004 Mill Rate:

14.8269 mills (County of St. Paul Farmland Rate);

9.8585 mills (Municipal District of Bonnyville Farmland Rate).

2004 Property Taxes (As Calculated):

Parcel A - \$

Parcel B - \$

Total: - \$

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

## APPENDIX II: DESCRIPTION OF SUBJECT PROPERTY

### Subject Parcel A - S.E. 1/4 Section 20-60-9-W4

#### i) Land Description

Subject Property is contained within the County of St. Paul located approximately 3 miles southeast of Mallard being northwest of St. Vincent and within close proximity to Secondary Highway No. 881 as shown in Figure 2 previously. Reference is made to the Subject Property as shown in the Aerial Photograph, Figure 4 following which shows the location of the property and road access provided at the east boundary. Topography is gently undulating with adequate drainage for the land to permit for an intensive agricultural use.

Subject soil classification according to the Canada Land Inventory is Soil Class No. 3 "c" being a Dark Grey Wooded Soil group of diversified agricultural productivity. Reference is made to the ARDA Map, Figure 4 previously with additional soil classification and assessment information as it would relate to the Subject land noted at Addendum D hereto.

Aerial photograph, Figure 5 following shows a portion of the land as open and cultivatable, an estimated 150 to 155 acres, while the southeast central portion has some tree cover for the existing building site. Estimated acres of cultivatable land can be utilized for cereal grain and forage production in a crop rotation program as it relates to the intensive use by the registered owner. Assessment information shows there is a varied level of productivity rating, overall between 49.8 and 54.9 percent for the cultivatable land area according to the assessment information. Land component is a Grey Wooded Soil group and has a Clay Loam to a Silty Loam texture for top and subsoil profiles with reasonably good drainage. It would have a desirable productivity rating, very comparable to land of a Grey Wooded Soil group for forage and cereal grain production in a crop rotation program. Writer submits the Subject land is utilized for cereal grain production as of the current effective date.

#### ii) Buildings and Site Improvements Description

There is a building site located in the southeast central portion of the quarter section parcel with access provided by the Municipal road at the east boundary. Writer observed all the buildings and site improvements from both the interior and exterior as required. Additional information was provided from the registered owner as necessary.

##### 1) Partial Two Storey Residence

Building improvement constructed in 1987, an actual age of 17 years, has an estimated effective age of 10 years and a remaining 65 year life being typical for a 75 year total life for that type of wood-frame structure. Building improvement is a partial two storey design with the main level of 1,200 square feet and the upper level of 792 square feet, a total living area of 1,992 square feet inclusive of the two developed levels. There is an attached two car garage of 528 square feet.

Building improvement has vinyl exterior finish complete with some brick accents on the front portion with peripheral double glazed metal and wood-frame window units. Appropriate access doors are provided to the residence and it has reasonably good quality exterior appeal.

Floor plan as to the main level consists of a front foyer for access to a large living room area with carpet floor covering, painted drywall walls and ceiling finish. There is also a main access from the attached garage, a 3

piece bathroom with similar vinyl floor, painted drywall walls and ceiling finish; a large kitchen and eating area with vinyl floor covering, painted drywall walls and ceiling finish with extensive oak wood kitchen cabinets as original of good quality design. A dining room of similar carpet floor, wall finish and an oak wood bar finish area. French doors provide access from the kitchen area to an enclosed sunroom at the west portion of the building improvement. A reasonably good floor plan, functional design and average finish quality throughout.

Upper level is developed with three bedrooms of similar carpet floor covering, painted drywall walls and ceiling finish. There is a 4 piece main bathroom with good quality fixtures. Adequate room size exists and a very functional floor plan.

Basement is developed with a large rec room, carpet floor covering, painted drywall walls and ceiling finish in addition to two bedrooms of similar finish quality. There is a 3 piece bathroom with a jacuzzi tub in addition to quality fixtures. There are two levels to the basement. One level is developed, while the lower level provides for utility services with a natural gas boiler as the hot water heating system as to floor heat, a natural gas forced air furnace and a hot water heater. A water pressure system and a water filter and iron removal unit in this area. Storage area, power panel and a built-in vacuum system is located in this level.

Good overall floor plan exists as to the developed area and reasonably well maintained, albeit primarily original quality finish exists throughout.

Attached sunroom measures 10 by 24 feet is of wood-frame construction with a vinyl floor, plywood peripheral walls and a metal ceiling, while the exterior is of similar vinyl siding and insulated, however, no supplemental heat. There is an attached wood deck that provides access from the enclosed sunroom.

Full services are provided to the building improvement and the immediate yard site area is landscaped.

## 2) Garage/Storage Shed

This wood-frame structure is located nearby the residence measuring 30 by 40.5 feet on a concrete foundation and a concrete floor ongrade throughout. It has a metal exterior finish with a metal clad gable roof. Interior is plywood lined and insulated and heat is provided by a natural gas forced air furnace and electrical service is also provided. There is a 10 foot ceiling height being desirable for storage and shop use.

## 3) Shop

This structure measures 50 by 20.5 feet has a metal exterior finish with a metal clad roof, all placed upon a concrete foundation and a concrete floor ongrade throughout. It would was utilized previously for swine production barn. Interior is plywood lined and insulated with some interior wood-frame divider walls for a portion as it relates for storage use. There is also a manure pit within the floor structure and an adjacent liquid manure holding tank as previously utilized for that purpose. Electrical service is provided, however, no supplemental heat.

## 4) Additional Building Improvements

There are additional structures used for storage of varied size, wood-frame construction and metal clad exterior. One structure measures 8 by 24 feet has a wood floor placed upon block with an asphalt roof and a plywood exterior finish being in poor condition utilized for storage. A second smaller building measures 11 by 12 feet is wood-frame, metal exterior and a metal roof with a plywood lined interior. A storage shed of 16 feet square has a metal exterior and a metal roof placed upon wood skids utilized for storage purpose.



#### 5) Livestock Processing Building

This wood-frame structure measures 14 by 20 feet is on a concrete foundation and a concrete floor ongrade throughout. It has colour coordinated metal siding and a metal clad gable roof. There is a small office area of 8 by 14 feet as plywood lined and insulated with a concrete floor and supplemental heat is provided. Remainder is open with a concrete floor and houses the livestock processing area complete with a headgate and the required amenities for that specialized use. Direct access is provided to the corral and holding area for livestock access.

#### 6) Grain Bins

There are three Westeel Rosco design metal bins contained on a concrete base with an estimated capacity of 5,000 to 5,500 bushels utilized for grain storage. Additional bins consist of two Westeel hopper bottom bins of 2,500 to 3,000 bushel capacity and a Taylor Industries hopper bottom bin of similar capacity, all placed upon a concrete pad. They provide for additional supplemental grain storage in addition to processed feed rations. Two smaller hopper bottom bins of older design provide for feed storage, if necessary.

Located nearby some of the hopper bottom bins would be a grain grinder unit, Farmking design powered by a 7.5 horsepower motor. It is contained within a wood-frame structure measuring 8 feet square that has a concrete floor. Electrical service is provided for that grain processing purpose.

#### 7) Site Improvements - Feedlot Facility

Feedlot area as established years previously shows varied size pens. Most pens have pressure treated posts and plank construction with some metal pipe in addition to an alleyway for access and a feedbunk area. Water bowl service is provided to the varied size pens complete with gates for ease of movement. Direct access is provided to the livestock processing area in addition to the scale for animal weighing purpose. Scale of an 80,000 pound capacity is a Pacific industrial scale placed upon a structure 11 feet wide by 30 feet in length, a concrete base with a metal structure and appropriate load cells for accurate weight of animals. It has a read out monitor with accessories contained in the nearby auxiliary building improvement.

Information provided to the writer indicates the varied size pens provide for a total livestock capacity of 1,000 to 1,500 head, depending upon the animal size. Good overall access is provided to the pens in addition to the feedbunk area. Services are utilized for that purpose. All pens are clean of manure and can be used at this time.

#### 8) Site Improvements and Services

Subject site has services that consist of natural gas, power and telephone to the residence and auxiliary building improvements. Water source is by means of two registered wells considered of adequate quality and quantity necessary for the feedlot operation. Sanitary sewer service basis a septic tank with field system to the residential building improvement. Electrical service is provided to the various improvements required for that use. Landscaped building site area exists with a gravel base driveway for access in addition to a second driveway to the feedlot being of adequate quality for livestock delivery trucks in addition to accessibility to the feedlot pen area. There is some fenced area for livestock within the immediate building site area.

Subject Parcel B - S.W. 1/4 Section 21-60-9-W4

i) Land Description

Land is located to the east of Subject Parcel A and good access is provided by the Municipal road at the west boundary. Land area is 161 acres (65.2 hectares), more or less. Land is open and extensively cultivated being flat to gently undulating topography. Similar soil classification is noted to Subject Parcel A in addition to the soil group with quality land as to desirable top and subsoil profiles. Good productivity rating of between 55 and 65 percent for the cultivatable land area.

ii) Buildings and Site Improvements Description

There are no building improvements contained on the property. There is provision for a current silage pit that is partially below grade with earth walls that permit for storage of silage product. Writer was not provided any information as to the volume of silage product contained therein nor any value associated with that improvement for that special purpose use.

Photographs of the Subject Property, taken [REDACTED] appear at Addendum B hereto.



## Appendix C

*County of St. Paul No. 19*

February 1, 2005

Daniel Brousseau  
Box 162  
St. Vincent, AB T0A 3B0

Dear Mr. Brousseau

VIA FAX: (780) 635-4938

**RE: Confined Feeding Operation**  
**SE 20-60-9-W4**

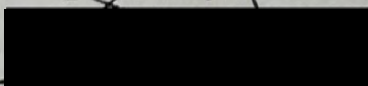
---

In researching this particular CFO, our records indicate that there were no permits issued for this site.

However, the Agricultural Operations Act (AOPA), states that all operations in existence prior to Jan. 1, 2002, that do not hold a permit with a municipality, are considered to have an approval under AOPA.

Any changes to the facilities capacity or future expansion will require approval from the Natural Resources Conservation Board as well as the County of St. Paul. Should you require any further information, please give me a call @ (780) 645-3301.

Thank-you,  
Yours truly,

  
Glenn Zayac  
Development Authority, County of St. Paul

GZ/lj

cc: Guy Laberge Via Fax (780) 645-2848  
Loans Officer







# Appendix E

## COUNTY OF ST. PAUL

5015 – 49 Avenue, St. Paul, Alberta, T0A 3A4  
www.county.stpaul.ab.ca



*Our Mission - To create desirable rural experiences*



July 2, 2025

Cathryn Thompson  
201 10008 107 Street  
MORINVILLE, Alberta, T8R 1L3

NRCB File: PB24006

### **RE: DB Farms Ltd. SE 20 60 9 4, County of St. Paul, Grandfathered Request**

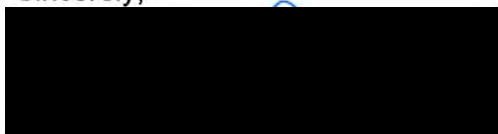
Thank you for your letter of June 10, 2025 regarding the captioned subject.

The County has reviewed the application. The land in question is zoned 'Agricultural', under the County's Land Use Bylaw. The Agricultural District provides for a range of extensive and intensive agricultural uses. Assessment records show that there is one dwelling on the property along with a large shop, grain storage, shelter belt, and several accessory buildings. The land around the farmyard, approximately 15 hectares in area, is fenced into a number of corals, while the balance of the quarter is in cultivation. Access to the property is from Range Road 94. The property is immediately adjacent to the Municipal District of Bonnyville.

The County has no objection to the NRCB approving the request that SE 20 60 9 4 is a Grandfathered site.

Please call, email, or visit the undersigned if you have any questions on the County's position or if you require additional information.

Sincerely,



Gary Buchanan, RPP  
Planning & Development Director  
780 645 3301  
gbuchanan@county.stpaul.ab.ca



County of St Paul

County of St Paul

Date Created: 7/2/2025



# Appendix F

**From:** [Kristy Poirier](#)  
**To:** [Carolyn Taylor](#)  
**Cc:** [Cathryn Thompson](#)  
**Subject:** RE: NRCB Application PB25006 by DB Farms Ltd. - Grandfathering Determination Request  
**Date:** Friday, July 4, 2025 3:13:04 PM  
**Attachments:** [image001.png](#)

---

This sender is trusted.

Hi Carolyn,

The M.D. of Bonnyville has no concerns with this application.

Regards,

---

**Kristy Poirier** | Development Officer II  
[Municipal District of Bonnyville No. 87](#)  
E: [KPoirier@md.bonnyville.ab.ca](mailto:KPoirier@md.bonnyville.ab.ca)  
P: 780-826-3171 Ext 2038  
Follow us on [Facebook](#) or [Twitter](#)

---

**From:** Carolyn Taylor <Carolyn.Taylor@nrcb.ca>  
**Sent:** July 4, 2025 11:21 AM  
**To:** Kristy Poirier <KPoirier@md.bonnyville.ab.ca>  
**Cc:** Cathryn Thompson <Cathryn.Thompson@nrcb.ca>; Carolyn Taylor <Carolyn.Taylor@nrcb.ca>  
**Subject:** NRCB Application PB25006 by DB Farms Ltd. - Grandfathering Determination Request  
**Importance:** High

**CAUTION:** This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Kristy,

I left you a voicemail letting you know that this Grandfathering Determination Request should have also been sent to M.D. of Bonnyville. My apologies for the oversight.

The CFO is located in St. Paul County however it borders right between St. Paul County and the M.D. of Bonnyville.

After reviewing the attached documents, we kindly request your written comments if possible by **July 18, 2025.**

If you have any questions, please contact Cathryn Thompson at 780-305-4751 or by email at [cathryn.thompson@nrcb.ca](mailto:cathryn.thompson@nrcb.ca).

Sincerely,

*Carolyn M Taylor*

Field Office Administrator; Northern & Peace Region

Natural Resources Conservation Board

Room 201, Provincial Bldg, 10008 - 107 Street

Morinville AB T8R 1L3

Main: 780-939-1212

E-mail: [carolyn.taylor@nrcb.ca](mailto:carolyn.taylor@nrcb.ca)

Website: [www.nrcb.ca](http://www.nrcb.ca)



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Classification: Protected A

---

**From:** Carolyn Taylor <[Carolyn.Taylor@nrcb.ca](mailto:Carolyn.Taylor@nrcb.ca)>

**Sent:** June 10, 2025 9:20 AM

**To:** [devpermits@county.stpaul.ab.ca](mailto:devpermits@county.stpaul.ab.ca); Yiren Liu <[yliu@county.stpaul.ab.ca](mailto:yliu@county.stpaul.ab.ca)>

**Cc:** Cathryn Thompson <[Cathryn.Thompson@nrcb.ca](mailto:Cathryn.Thompson@nrcb.ca)>; Carolyn Taylor <[Carolyn.Taylor@nrcb.ca](mailto:Carolyn.Taylor@nrcb.ca)>

**Subject:** NRCB Application PB25006 by DB Farms Ltd. - Grandfathering Determination Request

**Importance:** High

Good morning,

NRCB Application PB25006 for a grandfathering determination request has been determined to be complete for processing today, **June 10, 2025**.

Please find attached the following 3 pdf documents:

- Grandfathering Notification Letter to County
- Grandfathering Determination Request
- Grandfathering Notification Letter to Landowners

After reviewing the attached document, we kindly request your written comments by **July 9, 2025**.

If you have any questions, please contact Cathryn Thompson at 780-305-4751 or by email at [cathryn.thompson@nrcb.ca](mailto:cathryn.thompson@nrcb.ca).

Sincerely,

*Carolyn M Taylor*



Field Office Administrator; Northern & Peace Region  
Natural Resources Conservation Board  
Room 201, Provincial Bldg, 10008 - 107 Street  
Morinville AB T8R 1L3  
Main: 780-939-1212  
E-mail: [carolyn.taylor@nrcb.ca](mailto:carolyn.taylor@nrcb.ca)  
Website: [www.nrcb.ca](http://www.nrcb.ca)



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Classification: Protected A

# Appendix G

**From:** [Allysa Weatherall](#)  
**To:** [Carolyn Taylor](#)  
**Subject:** RE: NRCB Application PB25006 by DB Farms Ltd. - Grandfathering Determination Request - EPA Response  
**Date:** Monday, June 23, 2025 8:35:46 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)

---

This sender is trusted.

Good day Carolyn,

Thank you for reaching out to our department. EPA Compliance has reviewed the letters, relevant legislation and conducted a search for reported environmental concerns/contraventions related to DB Farms Ltd.

EPA does not have concerns under our legislation related to the farms activity.

Respectfully,

**Allysa Weatherall, B.Sc.**

Compliance Manager

Capital, Regulatory Assurance Division North

Alberta Environment and Protected Areas

Government of Alberta

111 Twin Atria Building  
4999 98 Avenue,  
Edmonton, AB T6B 2X3

Cell 587 990 3950

[Allysa.Weatherall@gov.ab.ca](mailto:Allysa.Weatherall@gov.ab.ca)

Environmental Emergencies 1 800 222 6514



Classification: Protected A

Classification: Protected A

---

**From:** Carolyn Taylor <Carolyn.Taylor@nrcb.ca>

**Sent:** June 10, 2025 9:26 AM

**To:** EPA Water Act Capital Region <EPA.wacapitalregion@gov.ab.ca>; Allysa Weatherall <Allysa.Weatherall@gov.ab.ca>; Third Party Requests <thirdpartyrequests@apexutilities.ca>

**Cc:** Cathryn Thompson <Cathryn.Thompson@nrcb.ca>; Carolyn Taylor <Carolyn.Taylor@nrcb.ca>

**Subject:** NRCB Application PB25006 by DB Farms Ltd. - Grandfathering Determination Request

**Importance:** High

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**CAUTION:** This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Good morning,

NRCB Application PB25006 for a grandfathering determination request has been determined to be complete for processing today, **June 10, 2025**.

Please find attached the following 3 pdf documents:

- Grandfathering Notification Letter to Agencies
- Grandfathering Determination Request
- Grandfathering Notification Letter to Landowners

After reviewing the attached document, we kindly request your written comments by **July 9, 2025**.

If you have any questions, please contact Cathryn Thompson at 780-305-4751 or by email at [cathryn.thompson@nrcb.ca](mailto:cathryn.thompson@nrcb.ca).

Sincerely,

*Carolyn M Taylor*

*Field Office Administrator; Northern & Peace Region*

*Natural Resources Conservation Board*

*Room 201, Provincial Bldg, 10008 - 107 Street*

*Morinville AB T8R 1L3*

*Main: 780-939-1212*

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Classification: Protected A

# Appendix H

## Livestock Capacity Determination based on Table 1 in Technical Guideline Agdex 096-81: Calculator for Determining Livestock Capacity of Operations as They Existed on January 1, 2002.

Table 1. Beef<sup>1</sup> animal number calculations

Type of Livestock	Space Allocation (ft <sup>2</sup> /animal)	Bunk Space Full Feed (ft/animal)	Bunk Space Limited Feed (ft/animal)	Enter Pen Area (ft <sup>2</sup> )	Enter Bunk Length (ft)	Pen Calculated Animal #	Bunk Space Full Feed Calculated Animal #	Bunk Space Limited Feed Calculated Animal #
Calculation	A	B	C	D	E	D ÷ A	E ÷ B	E ÷ C
Cows/finishers (900+ lbs) northern AB	250	1.0	2.5					
Cows/finishers (900+ lbs) southern AB	200	1.0	2.5					
Feeders (450-900 lbs) northern AB	200	0.8	2.0	<b>341,754</b>	<b>1,595</b>	<b>1,709</b>	<b>1,994</b>	<b>798</b>
Feeders (450-900 lbs) southern AB	175	0.8	2.0					
Feeder calves (<550 lbs) northern AB	175	N/A	1.3				N/A	
Feeder calves (<550 lbs) southern AB	150	N/A	1.3				N/A	

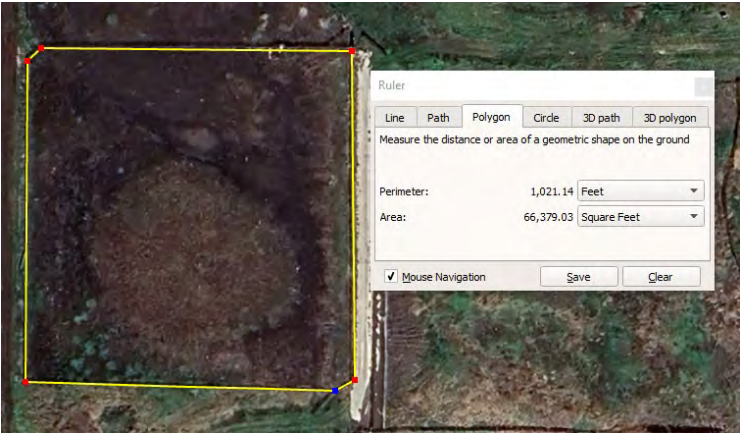
May 2024 Aerial Imagery (Google Earth) was used to measure pen areas and bunk length.



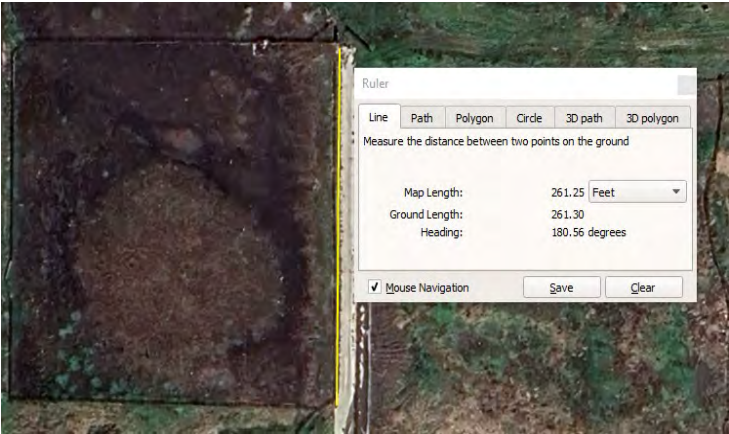
PEN NUMBER	PEN AREA (FT <sup>2</sup> )	BUNK SPACE (FT)
PEN 1	66,379	261
PEN 2	75,773	266
PEN 3	65,900	266
PEN 4	18,594	160
PEN 5	40,149	230
PEN 6	49,997	279
PEN 7	24,962	133
<b>TOTAL</b>	<b>341,754 ft<sup>2</sup></b>	<b>1,595 ft</b>



Pen 1

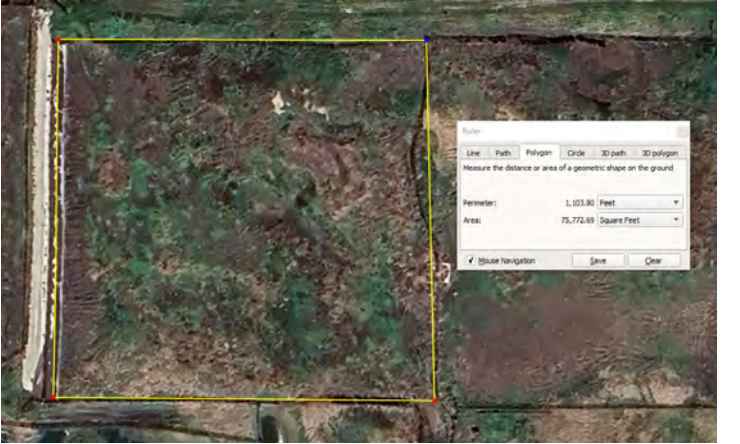


Pen 1 Area: 66,379 ft<sup>2</sup>

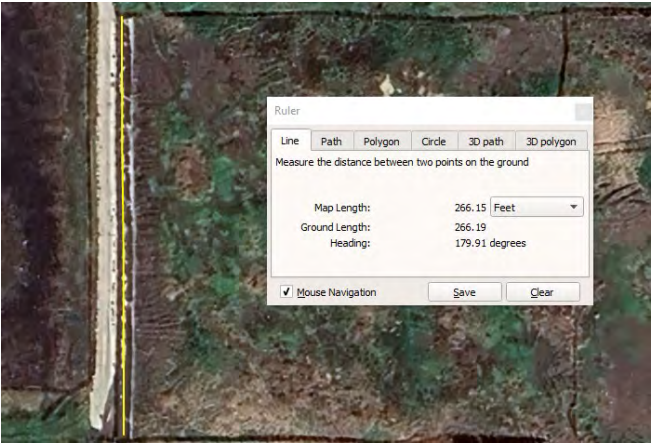


Pen 1 Bunk Length: 261 feet

Pen 2

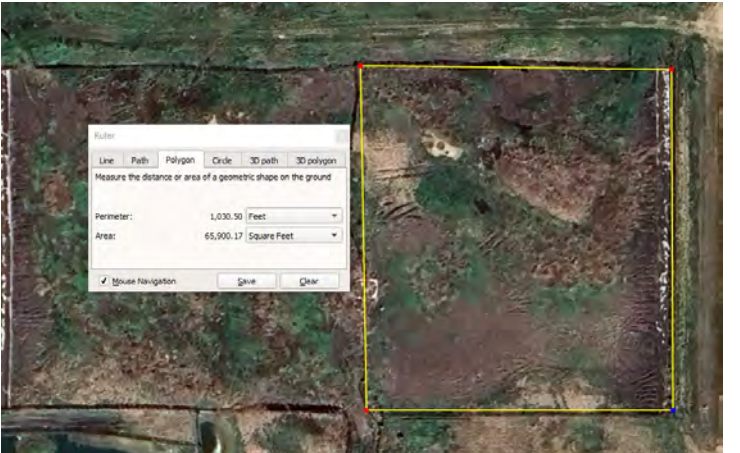


Pen 2 Area: 75,773 ft<sup>2</sup>

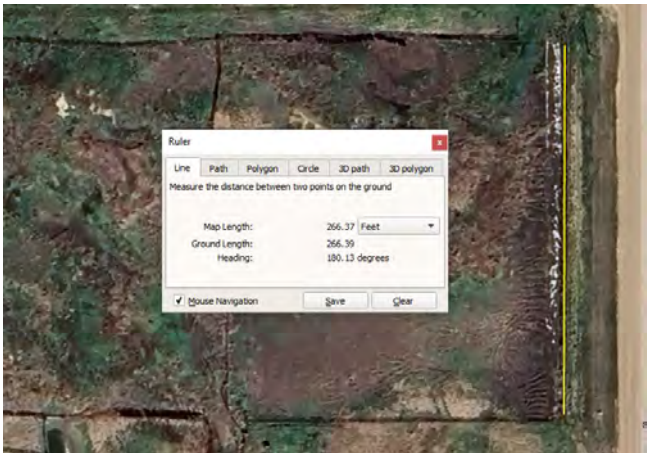


Pen 2 Bunk Length: 266 feet

Pen 3



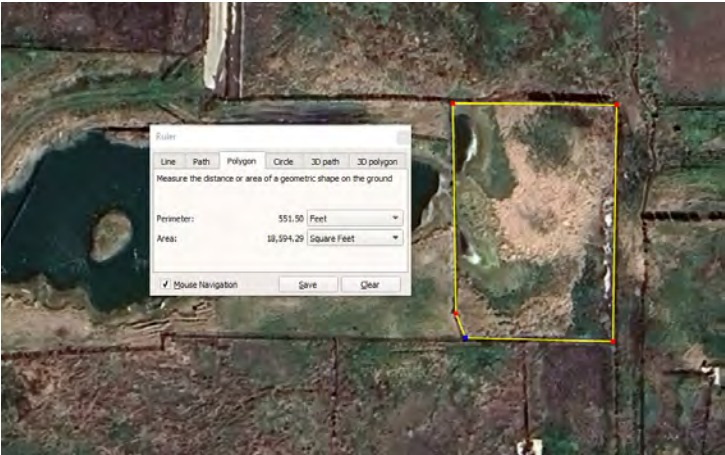
Pen 3 Area: 65,900 ft<sup>2</sup>



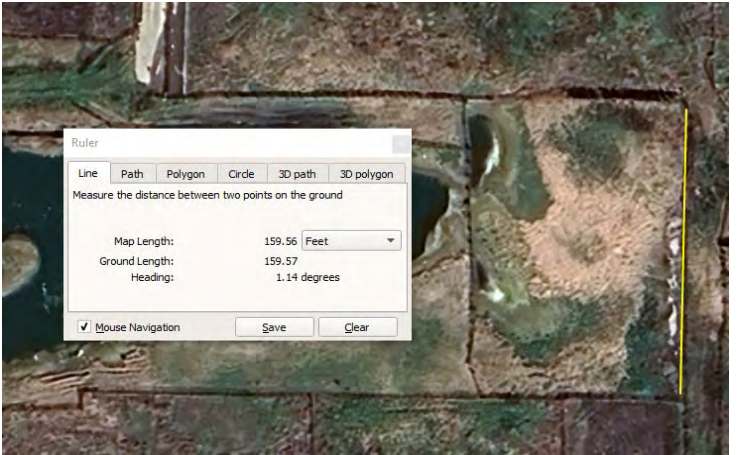
Pen 3 Bunk Length: 266 feet



Pen 4

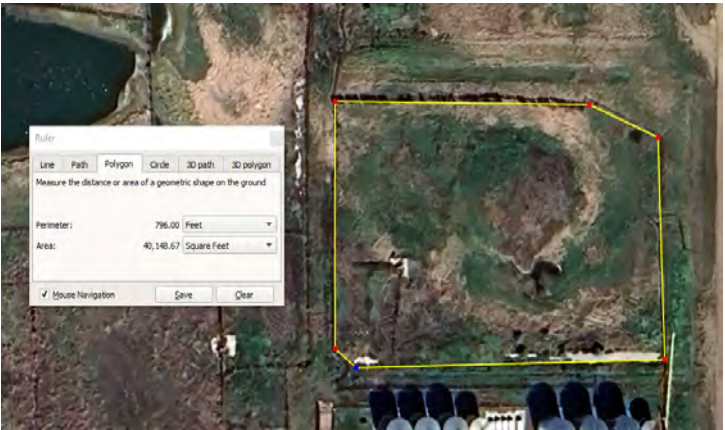


Pen 4 Area: 18,594 ft<sup>2</sup>

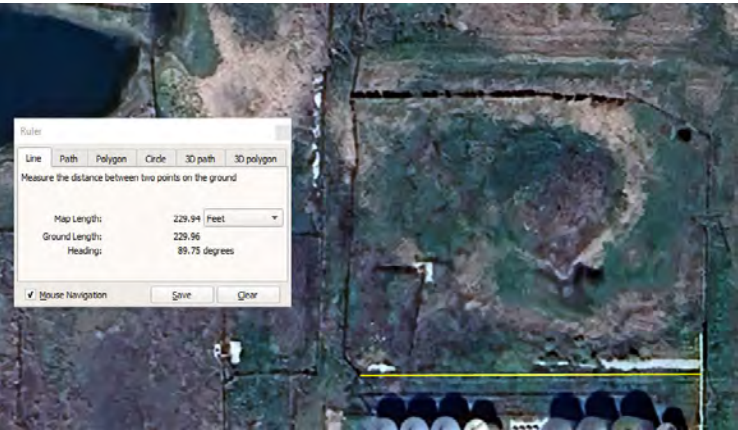


Pen 4 Bunk Length: 160 feet

Pen 5

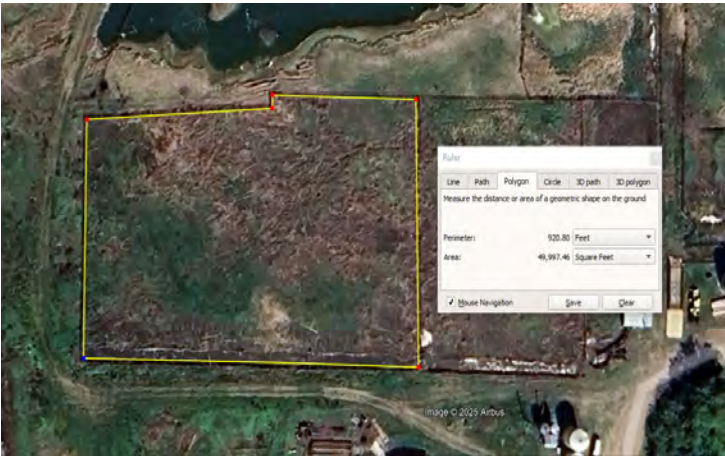


Pen 5 Area: 40,149 ft<sup>2</sup>



Pen 5 Bunk Length: 230 feet

Pen 6

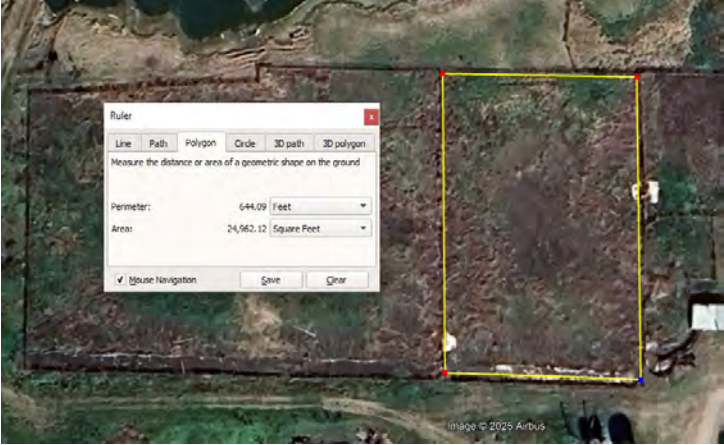


Pen 6 Area: 49,997 ft<sup>2</sup>

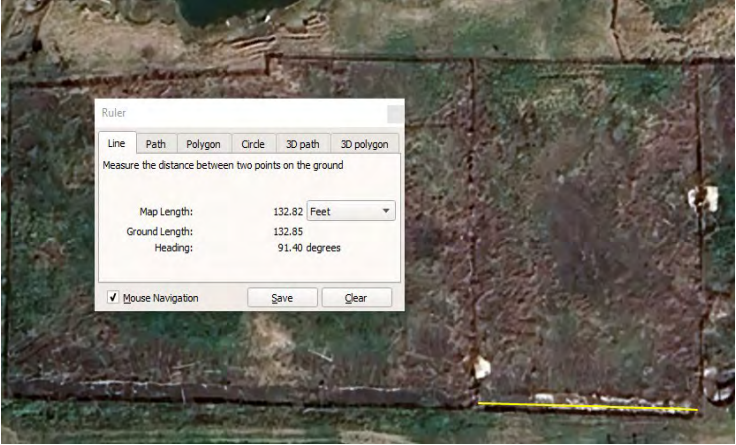


Pen 6 Bunk Length: 279 feet

Pen 7



Pen 7 Area: 24,962 ft<sup>2</sup>



Pen 7 Bunk Length: 133 feet



# Appendix I

May 2024 Google Maps Aerial Imagery. Labelled by Cathryn Thompson.

