

May 28, 2025

Anne Erickson Manager of Development Services Vulcan County Box 180, 102 Centre St Vulcan, AB TOL-2B0

Subject: Vulcan County Draft Municipal Development Plan

Dear Ms. Erickson,

On behalf of the Alberta Cattle Feeders' Association (ACFA), we are writing to express concerns with the draft Municipal Development Plan (MDP) currently under review in Vulcan County. ACFA represents cattle feeders across Alberta, which are committed to sustainable agricultural development and support sound land-use planning that balances municipal growth with the viability of the livestock sector. Alberta is home to 70% of all fed cattle in Canada and the cattle feeding sector is a strong economic driver for rural communities, particularly in the southern part of our province.

There are certain provisions within the proposed MDP which we feel could unintentionally hinder future agricultural development and may conflict with existing provincial legislation, specifically the Agricultural Operation Practices Act (AOPA). Our specific concerns include:

- Excessive Exclusion Zones: The proposed buffer zones around some communities significantly exceed the Minimum Distance Separation requirements established under AOPA. These extended zones reduce available land for Confined Feeding Operations, impacting the growth potential of local agriculture and in turn, the growth potential of rural communities.
- Scope of NRCB Considerations: The draft plan encourages the Natural Resources Conservation Board (NRCB) to take haul routes and infrastructure into account when reviewing applications. These factors are outside the NRCB's jurisdiction under AOPA and could lead to inconsistent regulatory expectations and enforcement challenges.
- Water Supply Requirements: The MDP proposes requiring proof of water availability for CFO applications. Water licensing falls under the jurisdiction of Alberta Environment and Protected Areas, not municipalities or the NRCB.
 This added requirement would introduce unnecessary complexity and delays and confusion during the application process.

Given these issues, we urge Vulcan County Council to revisit the draft MDP and ensure its alignment with AOPA to avoid unintended barriers and duplication of regulatory process, ensuring a clear, consistent regulatory framework for all stakeholders. We welcome the opportunity to discuss further, should that be of value.

Sincerely,

Janice Tranberg

President & CEO, Alberta Cattle Feeders' Association

