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Don Malinowski

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Senior Planner
Community & Regional Planning Branch
Technical Review Section
604-800 Portage Ave.
Winnipeg MB
R3G 0N4

Re:

Waldheim Colony

Technical Review - Response to Questions and Public Concerns

Dear Mr. Malinowski;

In response to questions and concerns expressed by the public and members of the Technical Review Committee we have prepared this letter in consultation with the proponent in order to address the concerns expressed.

Item #1 - Comments of Manitoba Environmental Compliance and Enforcement Branch

The proposed composting site is only intended for mortalities which occur during the production process. Spent hens will typically be butchered for consumption by the colony membership and therefore not require disposal by means such as composting or rendering. It is not intended to utilize any significant amount of manure in the composting process as manure produced by the proposed operation will be handled as a liquid. Straw, wood shavings and organic garden waste are the most likely medium to be used during the composting process and will therefore not require a permit to construct a manure treatment facility.

It is intended to handle the manure produced by the proposed facility as a liquid and introduce this into the existing earthen manure storage. Sufficient capacity exists to accommodate 400 days of storage for the existing hog operation and proposed layer facility. As there will be an additional influent line required to facilitate the new barn, a permit application will be required to be filed with Sustainable Development. This permit application will incorporate details of the influent line and erosion protection that will intend to be installed.

Subsequent evaluation and monitoring of the earthen manure storage currently utilized to store the manure from the existing hog operation was conducted between 2010 and 2012. Monitoring well results

from 2012 and just most recently 2017 have revealed very little variation in the constituents tested for. This information along with the clay sampling has indicated that the clay soils from which the storage was constructed are suitable to provide the necessary environmental protection. However, the presence of topsoil in several locations beneath the berms has indicated the need for some remedial work in order to isolate these materials. Additional erosion protection at the influent line was also determined to be required to ensure slope stability. As it will be intended to apply for a permit from Sustainable Development to install the lift station, influent line and erosion protection for the proposed layer operation and interconnect with the existing EMS, it is intended to address the other remedial work at the same time and undertake the work under the same permit in order to ensure compliance with current storage requirements.

Item #2 – Florent Legault and Debbie Troche

Waldheim Colony will consist of 20 to 25 families at its peak and as such must support these same families with the agricultural and manufacturing enterprises that they participate in. In the absence of any significant commercial enterprise, the colony is dependant primarily on its agricultural activities to provide the necessary income to sustain themselves and provide for the opportunity to start a new colony in the future as the population of the colony expands over time. As with any other family farm, where the children also wish to farm, it is inventible that the operation must grow in order to be able to sustain the families operating it. Also take note of the fact that an existing 80 cow dairy herd (108 AU) was dispersed of and is proposed to be replaced by the layer and pullet operations which only represent 86 AU.

To put this into context, if Waldheim Colony was operated by the 20 individual families independent of one another, each family would operate approximately 300 acres of cropland, 1000 laying hens, 200 boilers and 30 sows farrow to finish. In today's economic environment, this size of operation would not be viable as a sole source of income.

As defined by the provincial regulation 120 laying hens is equivalent to 1 AU and similarly 303 pullets is equivalent to 1 AU. The calculation of animal units has been summarized in the table provided in the Site Assessment.

Due to the size and scope of the livestock operations currently in place and proposed by Waldheim Colony, they are required to comply with the Livestock Manure and Mortalities Management Regulation which is a provincial regulation that regulates the storage and application of livestock manure. A manure management plan must be submitted by the colony to the provincial government on an annual basis which includes soil test results on land to receive manure and the proposed application rates, in order to ensure that nutrient accumulations in the soil are not excessive and threatening to the environment. In the event that these same livestock operations were operated by 20 individual families, this same requirement would not exist as the animal units would be below 300 per family. Hence, in answer to your question, there are systems and regulations in place by the province to monitor the industry and protect the

environment established by the scale of the operations. These same requirements and monitoring would otherwise not exist if the proposed size of operations was operated by 20 individuals.

It is not possible to comment on the economic conditions that currently exist which are driving the agricultural sector. Each individual's situation is unique and each person has their own quality of life which they would like to maintain. Waldheim Colony has chosen to operate as a small community instead of individuals which has afforded them the opportunity to reap some of the reward of economies of scale which would otherwise not be possible and thereby maintain profitability.

I trust this response will adequately address the concern and questions expressed. Please feel free to contact me if you have any additional questions or concerns.

Respectfully Submitted

South-Man Engineering

Per

Peter Grieger, P. Eng