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Community Planning

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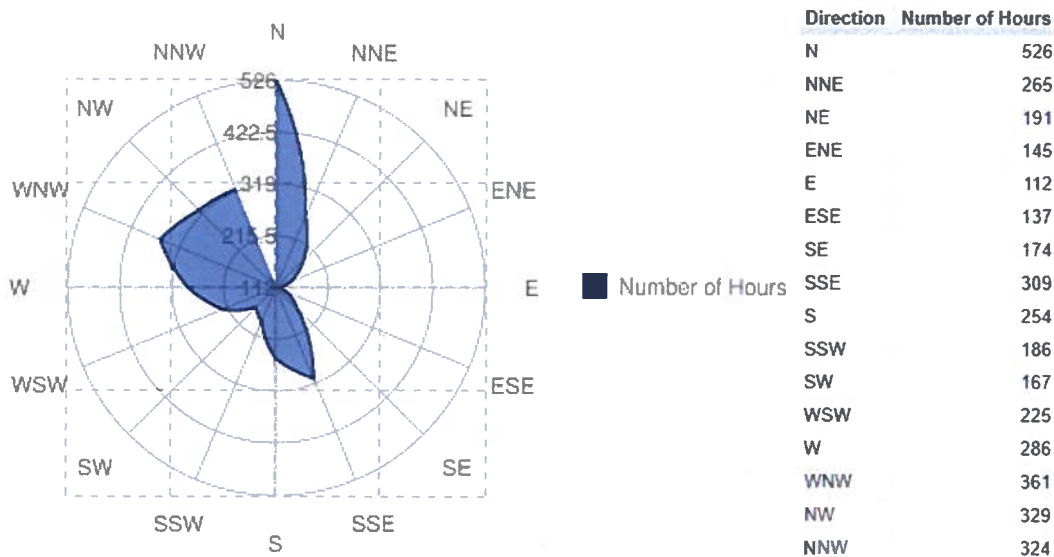
**Re: Rose Valley Colony Site Assessment
Response to Public Comments and Concerns**

Comment #1: Darren Bergen (residence location: NW 12-6-6W)

Although this residence is outside the 3 km radius (about 3.3 km from the proposed EMS location), it is conceivable that this resident would experience odour when the wind is blowing from the northwest. During normal daily operation the odour intensity would not be expected to be enough to cause any great disruption. During periods when the manure storage is being cleaned out and field applied, the odour intensity is expected to intensify and at that time may become more of a nuisance. The proposed modifications will provide sufficient manure storage to accommodate for once per year manure application, thereby reducing the frequency of such incidences. Through management practices the colony can also mitigate these impacts by field applying manure on parcels of land not in direct line with specific neighbours depending on the prevailing wind directions predicted during that period. Similarly field storage of soild manure can be situated with these same considerations taken into account.

Comment #2: Joe Schilling (residence: north of the project site)

Mr. Schilling has expressed that he is not opposed to the expansion however has concerns with regards to odour particularly when there is a south wind. The prevailing winds directly from the south are relatively infrequent, however some impact is likely. As indicated in Comment #1 it is intended to provide sufficient manure storage to facilitate only once per year manure application thus eliminating the need for multiple intense odour activities such as field application and manure storage agitation. Upon completion of the development it is also intended to establish shelter belts around the manure storages as the colony residences experience a similar odour of greater intensity than you would due to their proximity when the wind direction is in line. The addition of shelter belts on the south and east sides of the manure storage will aid in reducing wind from carrying odours a significant distance by reducing the wind speed over the surface.



Wind direction distribution at Carman station

https://carman.weatherstats.ca/charts/wind_direction-quarterly.html

Comment #3: John and Shawn Jones (residence: may be SE 28-6-6W)

The location of the residence of John and Shawn is not mentioned in the letter though their comments suggest that the residence is likely on SE 28-6-6W.

Concern #1: Given the proximity of this expansion and the existing operation to several residential sites (including our own) and the Village of Graysville, we propose that the manure storage requirements for the expanded operation should be satisfied by a covered concrete or steel tank. We believe that this proposed condition is reasonable given the size of the proposed expansion and its location at least partially within the Restricted Agricultural Policy area.

Response: The siting and mutual separation distances of the proposed expansion from the features are based on the amended zoning bylaw (Bylaw # 12/2019) of Carman-Dufferin Planning District. The proposed site satisfies the required separation distance from the residential site mentioned in the comment. However, application for a variance order has already been submitted to the RM for the separation distance from the Village of Graysville. Since the prevailing wind from the south and SSE are relatively infrequent, we expect that impacts of odor from the proposed expansion on these residential sites and the Village of Graysville will not change significantly from what has existed in the past.

Concern #2: We are concerned with the effectiveness of the current and proposed Mortalities (Dead Animal) Disposal set out at paragraph 10.3, particularly given the size of the proposed expansion. Remains of mortalities (pigs) have made their way regularly onto our property. We believe it would be appropriate to have conditions which would address the integrity of the mortality disposal sites to prevent this from happening.

Response: Siting of the proposed mortalities compost site meets the requirements of the RM's zoning bylaw. The design and management of the composting facility shall prevent the entry of predators and domestic animals into the facility and eliminate the removal of carcasses as you have suggested. Similarly, these carcasses are to be adequately covered with compost medium to discourage burrowing and unearthing of the carcasses from the compost bed. Additional management practices and the incorporation of an appropriate fence will be provided to avoid any further events such as this from occurring.

Concern #3: We are also concerned about the increased heavy truck traffic, along with the associated dust and noise that would be the inevitable result of the proposed expansion. Safety is also a concern given the blind corners near the highway.

Response: With exception of during the construction phase it is not anticipated that vehicle traffic will increase significantly with the proposed expansion. During construction periods it would be suggested that dust control be placed on the portion of the municipal road that is in close proximity to your residence and the blind corners that are also in close proximity. A cost sharing agreement between yourselves, Rose Valley Colony and Kroeker Farms would be a reasonable solution as all parties are directly impacted.

With regards to safety, it is reasonable that the municipality can install speed restriction and warning signs associated to the blind curves that are present. Members of the colony would be familiar with the safety concerns, however, others from outside of the colony may not possess this same knowledge and it would be advisable to alert them to the dangers.

Comment #4: Ethel Hook (residence: may be east of the site on SE 23-6-6W)

The Site Assessment proposal states that the existing 'earthen manure storage' (EMS) facility is closer to the east property line than is permitted: Despite this, the proposal states that the expanded EMS facility will be located adjacent to the existing site, and an application will be made for a Variance to the zoning bylaw: It further states that the future expanded EMS facility will not have a 'manure storage cover'.

Concern #1: What is the basis for regulations regarding minimal distances for manure storage facilities from residences/dwellings and non-agriculture designated areas?

[Site Application document: #8.3 Separation Distances (zoning bylaw); and #10.4 (Proposed Setback Distances from Water and Property Lines)]

Response: Both the separation distances (Site Assessment # 8.3) and setback distances (Site Assessment # 10.4) are based on the zoning bylaw (Bylaw # 04/2014) of Carman-Dufferin Planning District and requirements of MB Sustainable Development. These distances have been determined from research conducted by the Manitoba government and other jurisdictions that have significant livestock development. The intent was to establish and determine distances that would minimize the potential for nuisance complaints as well as provide a reasonable level of environmental protection.

Concern #2: Why is the proposed expanded manure storage facility to be located in an area that does not currently meet said minimal requirements? Why would this be allowed?

Response: The proposed location was selected to further remove the earthen manure storage from the surface water located west of the storage site in order to minimize the risk of pollution of surface water resources. The setback distance of the manure storage from the east property line meets the minimum setback distance required by the RM and MB Sustainable Development (100 m). As a consequence of meeting the required setback distances for environmental protection it is required to apply for a variance from the RM to vary the separation distance of the manure storage from the residence east of the site.

Concern #3: What are the risks of sewage leakage/contamination to the land and the nearby Boyne River because of this non-adherence to minimal requirements? How will a Variance order mitigate the risks?

Response: The minimum setback distance from the nearest surface water course as required by the zoning bylaw and MB Sustainable Development was adhered to while selecting the proposed site for the manure storage. The separation distance coupled with ongoing monitoring of the manure storage performance is intended to protect surface water resources in the area.

Concern #4: Given that the Boyne River runs through my property, what could be the potential negative impact on my property from greatly increased manure storage needs, and what guarantee is there that such damage will not occur?

Response: Response to concern #3 above is similar in nature.

The Site Assessment proposal also states that the "... first and immediate phase is to be construction of a new barn to accommodate 1200 grower/finisher pigs which are currently housed off-site in a rented barn" [17.0 (Additional Information)]. Despite this influx of animals, there is no reference to any expansion of manure management at this stage.

Response: Sufficient land base has been identified in the rural municipalities of Dufferin and Thompson for utilization of the manure nutrients to ensure long-term environmental sustainability. Moreover, filing of an annual manure management plan based on *Livestock Manure and Mortalities Management Regulation* will ensure monitoring of the sustainability.

Concern #5: What will be the impact of the 1200 additional animals on the capacity and capability of the existing concrete manure tank and manure storage facility?

Response: The existing concrete tank is capable of storing manure production from 1100 sows: f-f, 10,000 pullets and 5 dairy cows for 254 days thereby eliminating the need for winter application of manure as required by MB Sustainable Development. The proposed earthen manure storage will not be constructed until the next phase when the hog inventory is further increase. There is a desire to by the proponent to reduce the frequency of manure application to once per year which may also precipitate the construction of the earthen storage in advance of any further animal number increases.

Comment #5: Beverly Stow

Based on the information provided it appears that Ms. Stow is situated approximately 5 miles to the southeast of the proposed site. Although it does not appear that all of the concerns of Ms. Stow were received due to scanning or faxing issues during transmission it was possible to ascertain many of the environmental issues of concern. Issues such as water supply, surface water runoff, nutrient runoff, accumulation of nutrients in the soil and social issues were the most prominent.

With exception of the social issues to which we cannot comment the remaining concerns are legitimate and of importance in all respects of agricultural production. The concerns expressed have been the focus of regulatory policy development for many years to ensure that these concerns are addressed and monitored on an on-going basis for operations such as that proposed by Rose Valley Colony. Any operation in excess of 300 AU are legislated to file annual manure management plans which outline the manure nutrients to be applied and at what rates to specific fields. Soil tests for these same fields serve to provide a history for the nutrient applications in the past to ensure nutrient accumulations are not occurring and resulting in an increased potential for nutrients impacting surface and groundwater resources.

Water licencing requirements are intended to monitor and establish the viability of water resources within a known aquifer to ensure sufficient supply for all users. Licencing becomes mandatory where daily usage exceeds 25,000 L as in the case of Rose Valley Colony. With the increased usage anticipated with the increase in animal inventory, the colony will be required to file for an amended water rights licence and undergo the review and approval process.

As indicated in the response for John and Shawn Jones in regards to safety, it is reasonable that the municipality can install speed restriction and warning signs associated with the blind curves that are present just south of Hwy 245 on Rd 33W.

To keep things in perspective we must bring to your attention that Rose Valley Colony consists of 18 families that are supported by agricultural activities. Based on the proposed 1860 AU, this would represent 103 AU per family, the equivalent to a 50 cow dairy herd, 82 sows F-F or 82 cow-calf pairs. As a result of choosing to live as a community the livestock associated with each family is considered as one entity and therefore endures much more scrutiny and regulation than would otherwise be imparted as a individual. From this perspective alone, the impacts of this one operation are anticipated to be much lesser than 18 individual smaller operations.

Respectfully Submitted,

South-Man Engineering

Per, 

Peter Grieger, P. Eng.