



TECHNICAL REVIEW COMMITTEE

**A TECHNICAL REVIEW REPORT
PREPARED FOR THE**

MUNICIPALITY OF RHINELAND

HORIZON COLONY FARMS LTD.

N ½ of Section 35-3-2 WPM

TRC 12-108

February 3, 2025

A. INTRODUCTION – THE TEAM

The Technical Review Committee (TRC) is supported by the following department personnel:

Agriculture (AGR)

- Agri-Resource Engineer
- Business Development Specialists
- Veterinarians
- Agri-Ecosystem Specialists

Natural Resources and Indigenous Futures (NRIF)

- Crown Lands Manager
- Fish Habitat Specialist
- Habitat Mitigation Biologist

Environment and Climate Change (ECC)

- Environmental Engineer
- Environment Officer
- Water Rights Licensing Technologist
- Land-Water Specialist
- Groundwater Specialist

Manitoba Transportation and Infrastructure (MTI)

- Senior Development Review Technologist
- Senior Flood Protection Planning Officer

Municipal and Northern Relations (MNR)

- Community Planners

And any other specialist or department that may have an interest or is consulted during the TRC process.

THE TECHNICAL REVIEW COMMITTEE (TRC) REPORT

Purpose of TRC Reports

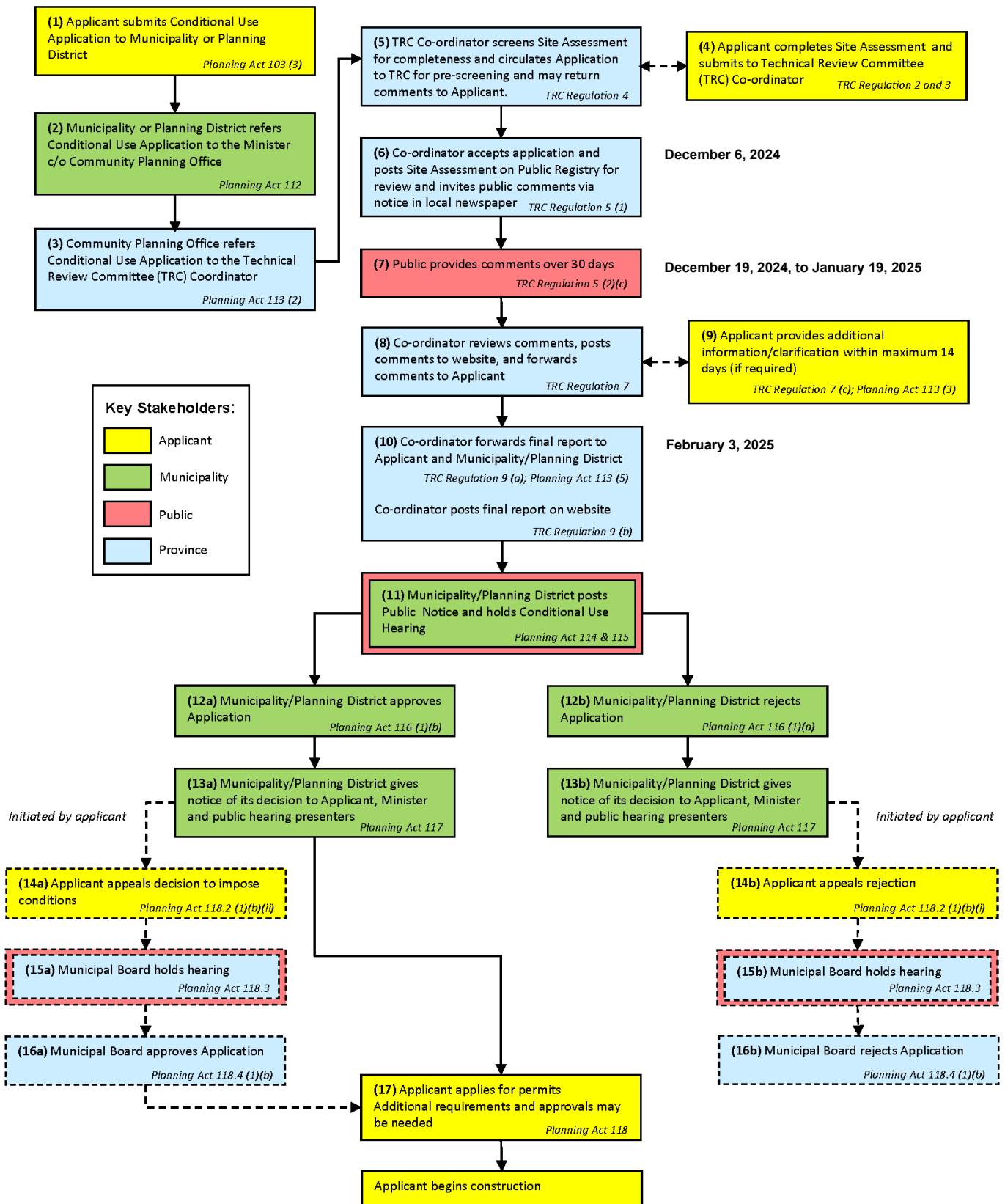
To provide objective, credible, technically-based assessments that:

- a) Enable municipal councils or planning district boards to make informed decisions regarding Conditional Use applications;
- b) Create common stakeholder understanding regarding livestock proposals, their potential impacts, and related regulatory requirements and safeguards;
- c) Provide a vehicle/forum that enables the sharing of public concerns and proponent responses;
- d) Offer recommendations to both councils/boards and proponents; and
- e) Represent the fulfillment of the TRC's role, as per 116(1)(b)(i) of The Planning Act – to determine, based on available information, that the proposed operation will not create a risk to health, safety or the environment, or that any risk can be minimized through the use of appropriate practices, measure and safeguards.

Should a municipal council or planning district board provide conditional approval of a proposal, the project proponent may be required to obtain various permits and licenses from the Province to address in greater detail environmental aspects of the proposal. As of November 1, 2019, a proponent may appeal a council/board's rejection of their application or appeal a condition imposed on the approval of a council/board to the Municipal Board.

Livestock Technical Review Process

(June 19, 2024)



B. DESCRIPTION OF PROPOSED LIVESTOCK OPERATION

Further information may be found at https://www.gov.mb.ca/mr/livestock/public_registries.html

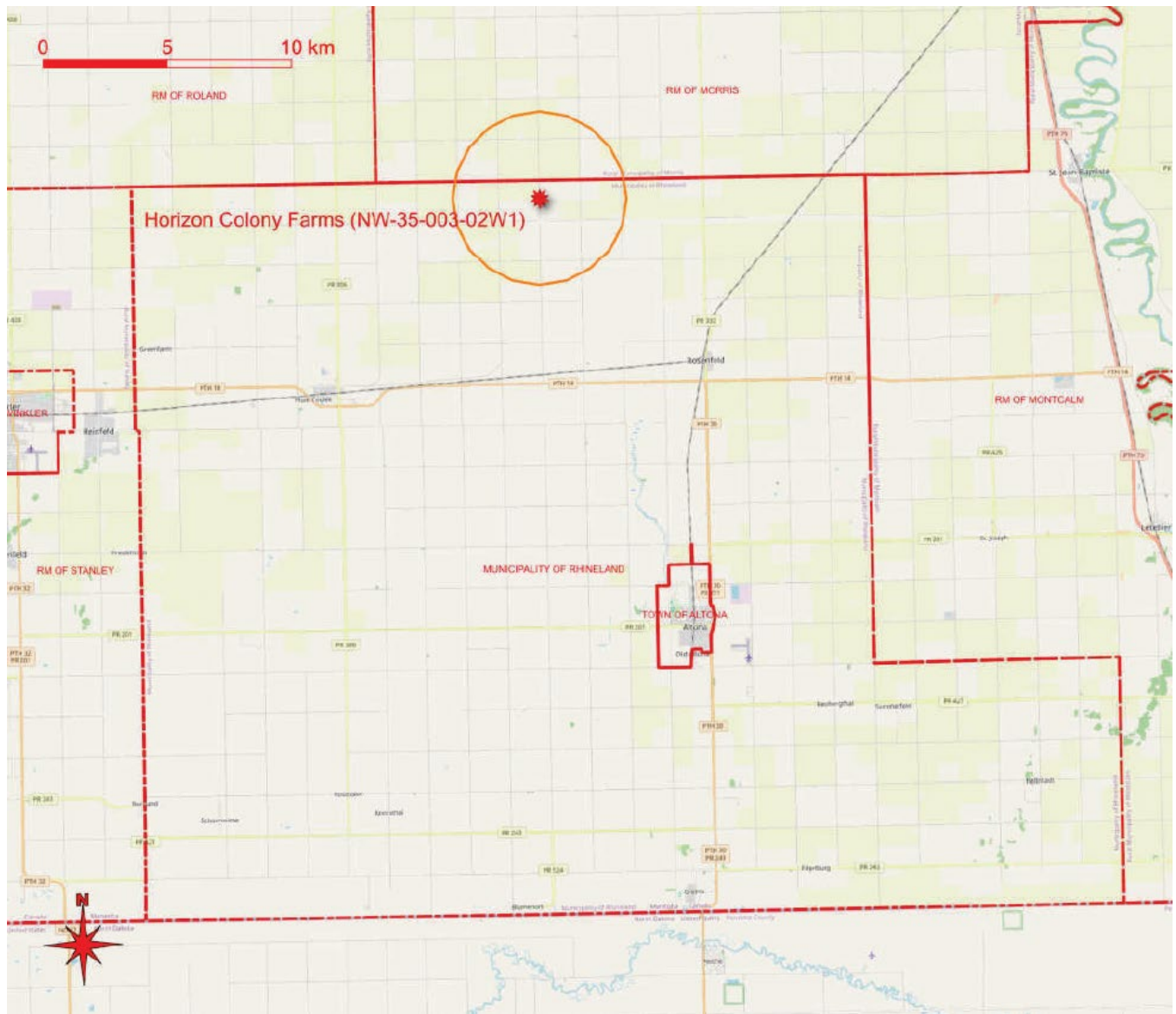
Applicant: Horizon Colony Farms Ltd.

Site Location: N ½ of Section 35-3-2 WPM (Refer to map below)

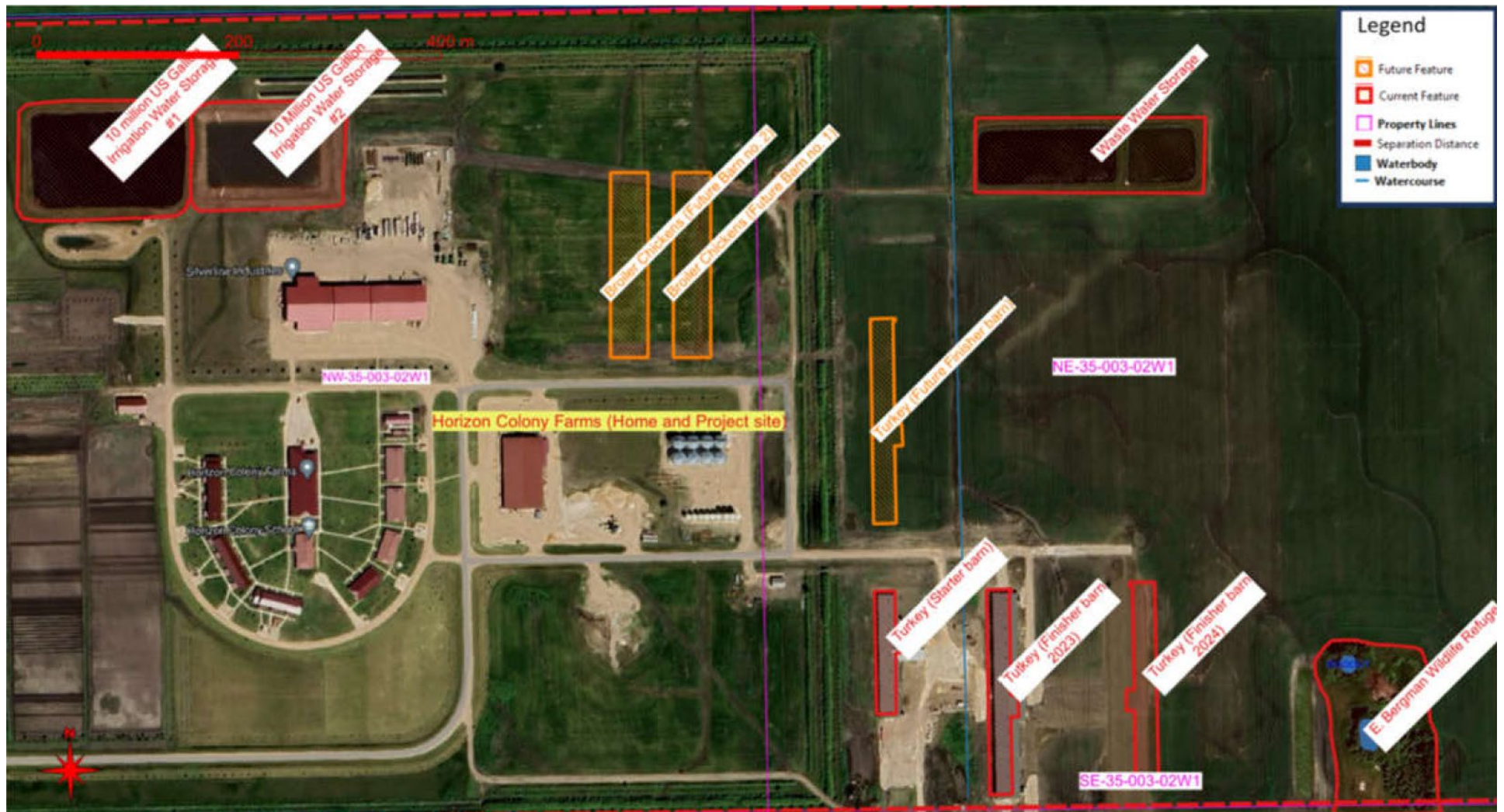
Proposal: The applicant proposes to expand an existing livestock operation. The proposal involves adding 66,000 broiler chickens and 72,000 heavy hens (turkeys), representing an increase from 270 to 1,320 animal units.

This will involve the following:

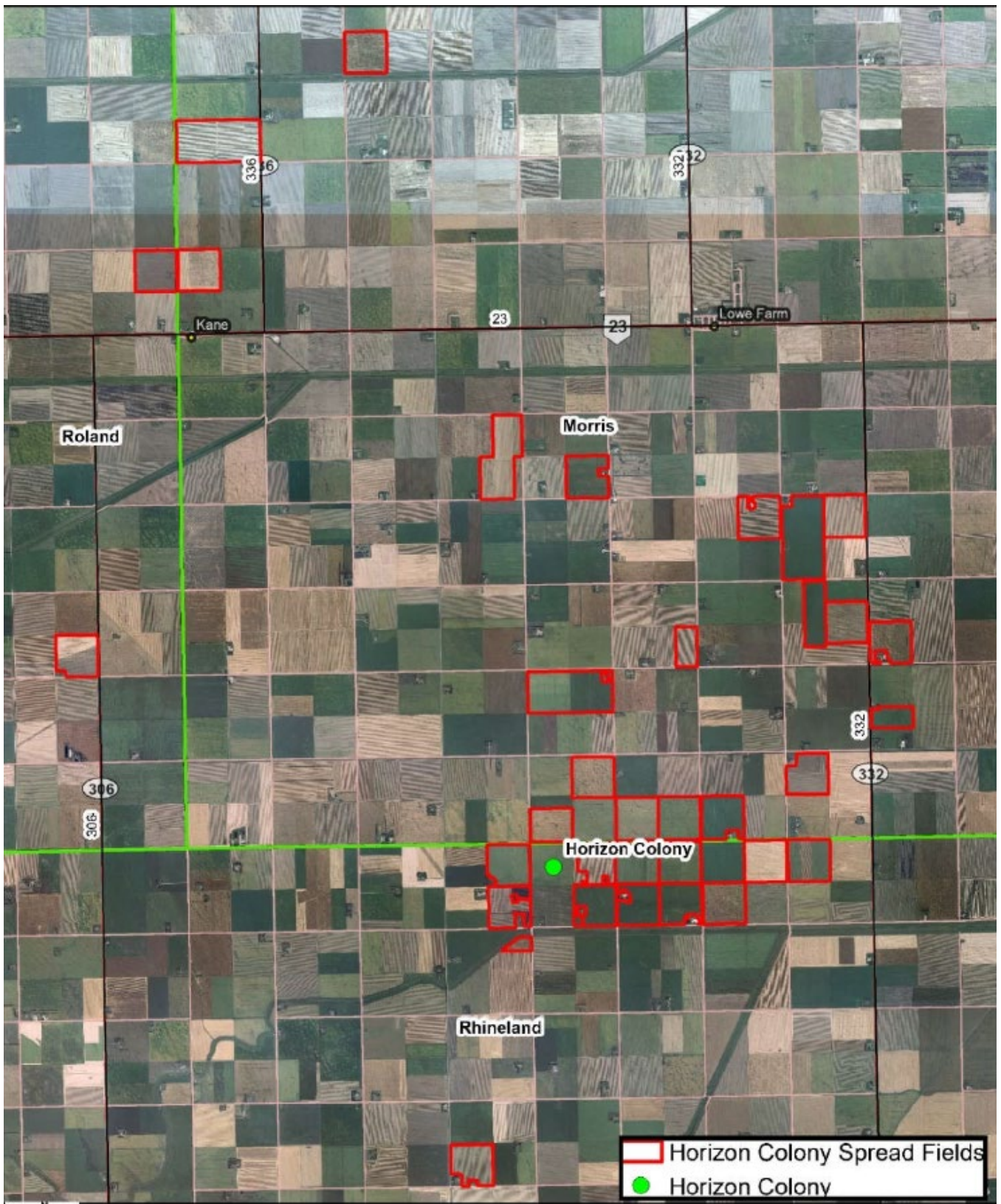
- Use of turkey starter and finisher barns without alteration, construction of new turkey finisher barn and two new broiler barns,
- Field storage of manure,
- Estimated daily water use of 40,194 imperial gallons from a dugout or reservoir (for all operations),
- Composting of mortalities, and
- Truck haul routes as shown in map below.
- There will be no change to the applicant's existing pig operations, which are not located on the project site.



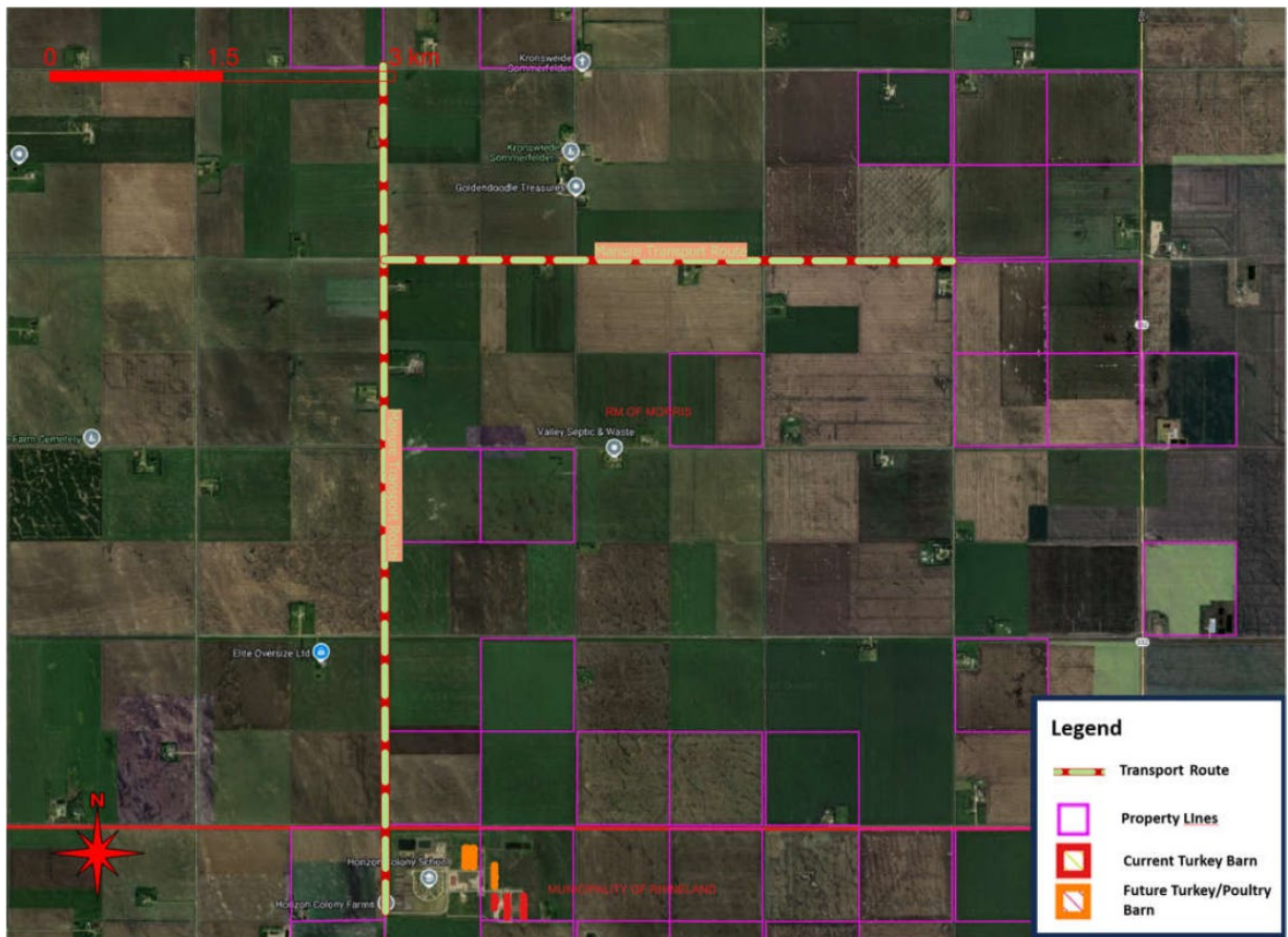
Location Map



Site Map



Spread Field Maps



Truck Haul Route Map

C. SITE ASSESSMENT OVERVIEW

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
1	Description of Operation and Nature of Project	<p>The Horizon Colony Farms Ltd. proposes to expand their turkey production facilities to increase the capacity from 270 Animal Units (AU) to 990 AU and add broiler chicken production facilities for 330 AU.</p> <p>The growth will require the construction of three new facilities – a ±50,250 ft² turkey finisher barn and two 72,000 ft² barns for broiler chickens.</p> <p>This conditional use application applies only to poultry operations on the project site at N ½ of Section 35-03-02 WPM.</p> <p>These proposed changes will result in a total maximum of 1320 AU on the N ½ of Section 35-03-02 WPM.</p>	MNR
2	Type and Size of Operation	<p>Horizon Colony Farms Ltd. is seeking conditional use approval from the Municipality of Rhineland to expand their turkey operation to 99,000 turkeys (equivalent to 990 Animal Units (AU)) and add 66,000 broiler chickens (330 AU) for a total of 1,320 AU on the project site at N ½ of Section 35-03-02 WPM.</p> <p>Horizon Colony Farms Ltd also operates separate, conditionally approved pig operations on S ½ of Section 36-03-02 WPM in the Municipality of Rhineland and SW ¼ 16-04-01 WPM in the RM of Morris, totalling 960 AU.</p> <p>These pig operations are not part of this conditional use application but have been included in the site assessment because the land base is shared between all of the operations. As such, the manure nutrients from the pig operation in the RM of Morris must be taken into consideration in the land assessment.</p>	AGR
3	Animal Confinement Facilities	<p>Construction of three new facilities is proposed with the expansion of the livestock operation. A 50,250 ft² turkey finishing barn, and two 72,000 broiler chicken barns are to be constructed.</p> <p>As all three additions exceed 6,458 ft² (600 m), building permits must first be issued by MSTW, as required by the Inspection and Technical Services Branch, Department of Labour and Immigration, under Manitoba Building Code Regulation M.R. 78/2023. Please contact MSTW at (204) 822-6223 or check their website at MSTW Planning District Permits.</p> <p>For more information, see the Inspection and Technical Services Branch website: https://www.gov.mb.ca/labour/its/bldg_codes/permits_and_inspections.html</p>	MNR
4	Confined Livestock Areas	The proposed facility is not considered a Confined Livestock Area and is not regulated under the Livestock Manure and Mortalities Management Regulation.	ECC
5	Project Sites Unsuitable for Development	The project site is not located within Nutrient Management Zone N4 or any Nutrient Buffer Zone.	ECC
6	<p>Water Source:</p> <p>Dugout or reservoir</p> <p>Water Requirements of 40,194 imperial gallons per day</p>	<p>Based on the water consumption information provided, this proponent is required to apply for a Water Use Rights Licence under The Water Rights Act. An application(s) can be submitted via our online portal – https://web22.gov.mb.ca/Sso/Account/LogOn</p> <p>Once the Water Rights application is submitted, a hydrology assessment will be done for volume availability and risk-level for the allocation. Please note, water availability has not yet been determined.</p>	ECC

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
7	Development Plan	<p>The Planning Act requires that development plans include a livestock operation policy that guides zoning by-laws dealing with livestock operations.</p> <p>The Planning Act requires that municipalities issue a development permit before any development takes place on a site. All development must comply with the Zoning By-law and Development Plan. Any proposed development that does not comply with required separation distances or setbacks must obtain Council approval following public hearing to vary those requirements.</p> <p>Development Plan Designation</p> <p>The site of the proposed livestock operation, located in the N ½ of Section 35-3-2 WPM in the Municipality of Rhineland, is designated General Agriculture (RPGA Development Plan By-law No. 3-2011). The proposal generally complies with Development Policies 2.3.9 to 2.3.21 (Livestock Policies).</p>	MNR
8	Zoning By-Law	<p>Zoning</p> <p>The site of the proposed operation is zoned “AG” Agriculture General (Municipality of Rhineland Zoning By-law No. 2021-06) with a minimum site area requirement of 40 acres and a minimum site width requirement of 200 ft.</p> <p>The proposed operation complies with the Zoning By-law.</p>	MNR
9	Separation Distances	The proposed building setbacks appear to comply with the Municipality of Rhineland Zoning By-law No. 2021-06.	MNR
10	Abandoned Wells	<p>The proposal states that water for the proposed livestock operation will be sourced from a dugout or reservoir and indicates no abandoned wells on the site or spread fields. However, both the provincial database and the proposal reference a well in the northeast corner of SW ¼ 16-04-01 WPM.</p> <p>It appears that this well may be abandoned. Any abandoned wells should be properly sealed if not in use and a sealed well report must be filed with the Groundwater Management Section of MB Environment and Climate Change. For information on well sealing and submission of reports, contact MB Environment and Climate Change (204-945-6959) or: https://www.gov.mb.ca/water/groundwater/wells_groundwater/index.html.</p> <p>A well drilling professional should seal all but the most basic wells. A list of currently licensed well drilling professionals can also be accessed from the above web page.</p> <p>During manure spreading, the setback distances to all groundwater features as prescribed under the Environment Act Livestock Manure and Mortalities Management Regulation should be considered as a minimum distance.</p>	ECC
11	Water Control Works	<p>No new water control works are proposed. If water control works are proposed, an authorization under The Water Rights Act is required.</p> <p>The proposed operation does not intend to fill or drain any regulated wetlands (Classes 3, 4 or 5).</p>	ECC

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
12	Manure Type and Storage: Solid/Field Storage	<p>The applicant will store solid manure as field storage. Under the Livestock Manure and Mortalities Management Regulation, the applicant must:</p> <ul style="list-style-type: none"> • Locate the manure at least 100 m from any surface watercourse, sinkhole, spring, or well. • Ensure the manure does not pollute surface water, groundwater, or soil. • Land-apply the stored manure the following year. 	ECC
13	Mortalities disposal methods identified: Composting	<p>The applicant will compost mortalities. Under the Livestock Manure and Mortalities Management Regulation, the applicant must:</p> <ul style="list-style-type: none"> • Ensure the composting does not pollute surface water, groundwater, or soil. • Locate the composting site at least 100 m from any surface watercourse, well, or the operation's boundaries. • Ensure the composting facilities and process are acceptable to the director. 	ECC
14	Setback Distances from Manure, Livestock, and Mortalities to Water and Operation Boundaries	The applicant has indicated that all setback distances meet minimum requirements set out in the Livestock Manure and Mortalities Management Regulation.	ECC
15	Building in Designated Flood Areas	This property is not within a Designated Flood Area.	MTI
16	Odour control measures (project site)	<p>Horizon Colony Farms Ltd. has indicated that shelterbelts will be established and that the poultry manure will be managed in the poultry housing as a manure pack and then temporarily stored in the field until it is land applied.</p> <p>Should odour become a problem for neighbouring residents, there is a complaints process under The Farm Practices Protection Act. A person who is disturbed by any odour, noise, dust, smoke or other disturbance resulting from an agricultural operation may make a complaint, in writing, to the Manitoba Farm Industry Board.</p> <p>The Act is intended to provide for a quicker, less expensive and more effective way than lawsuits to resolve nuisance complaints about farm practices. It may create an understanding of the nature and circumstances of an agricultural operation, as well as bring about changes to the mutual benefit of all concerned, without the confrontation and the expense of the courts.</p>	AGR
		<p>Section 116(1) of The Planning Act allows municipal councils to require a manure storage cover and the planting of a shelterbelt as a condition of approval.</p> <p>The applicant has indicated that trees will be planted to form a shelterbelt to limit air and odour movement.</p>	MNR

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
17	Land Available for Manure Application	<p>Since the manure from the pig operations will also be applied to the land available for the poultry manure, the land assessment includes the manure nutrients (nitrogen and phosphorus) from the entire livestock inventory (pigs and poultry).</p> <p>The estimated land requirement for Horizon Colony Farms Ltd. is 3,202 acres for the phosphorus excreted by all of the pigs and poultry owned by the colony, or 3,016 acres for the nitrogen, whichever is higher. Horizon Colony Farms Ltd. has exceeded the land requirement by demonstrating that they have access to 5,435 suitable acres. Additional details can be found in the appendix.</p>	AGR
		<p>The spread field locations are located across three municipalities (RMs of Roland and Morris and Municipality of Rhineland [RPGA]). All locations are designated General Agriculture or Restricted Agriculture and comply with their respective Livestock Policies (RM of Roland By-law 5-2001, Policy 4.3.2; RM of Morris By-law 1712/15, Policies 3.3.4-14; RPGA By-law 3-2011, Policies 2.3.9-21.2).</p> <p>The proposed spread field locations are zoned "AG" General Agricultural or "AR" Restricted Agricultural Zone (RM of Roland Zoning By-law 6-2001; RM of Morris Zoning By-law No.1713/2015; Municipality of Rhineland Zoning By-law 2021-6) and support existing agricultural activity.</p>	MNR
18	Setbacks for Manure Application	Under the Livestock Manure and Mortalities Management Regulation, manure spreading must meet setback distances to all surface watercourse and groundwater features.	ECC
19	Manure Transportation and Application	<p>Please be advised that any structures placed within the controlled area of PR 306, PR 332, and PR 336 (125 feet from the edge of the right-of-way) requires a permit from our office. For permit information, please contact Juanita Mowbray at 204-583-2433 or by email at Juanita.Mowbray@gov.mb.ca. Permit information can also be found at https://forms.gov.mb.ca/highway-permits-application/index.html.</p> <p>The placements of temporary drag lines or any other temporary machinery/equipment for manure application within the right-of-way of any Provincial Trunk Highway (PTH) or Provincial Road (PR) requires permission from Manitoba Transportation and Infrastructure's Steinbach Office. Please contact the Regional Planning Technologist, Robert Fender, at (204) 346-6266 or Robert.Fender@gov.mb.ca. In addition, please notify the Regional Planning Technologist for the placement of temporary draglines or other temporary equipment for manure application within the controlled area of PR 306, PR 332, and PR 336 (125 feet from the edge of the right-of-way).</p>	MTI
		<p>Under the Livestock Manure and Mortalities Management Regulation, the applicant must:</p> <ul style="list-style-type: none"> Operate with an annual manure management plan which includes: <ul style="list-style-type: none"> Manure type, volume, and nutrient values Spread field location and soil class Soil tests showing nitrogen and phosphorus levels Crops to be grown Manure application rate Ensure manure does not pollute groundwater, soil or escape the operation's boundaries. [cont'd] 	ECC

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
		Follow requirements for the land application of manure, including nitrogen limits and phosphorus thresholds.	
20	Manure Application on Lands Subject to Frequent Flooding or Inundation	The applicant has indicated that some spread fields are located within a regularly inundated area. Under the Livestock Manure and Mortalities Management Regulation, manure applied there between September 10 and November 10 must be injected or incorporated within 48 hours. This does not apply where perennial forages are established, or the soil is not disturbed except for seed planting or commercial fertilizer application and has adequate crop residue to control erosion.	ECC
21	Projected Truck Haul Routes and Access Points	The proposed truck haul route uses existing municipal roads and we have no concerns.	MTI
		The proposed site is accessed by Municipal Road 8W. As per Section 116(2) of The Planning Act, municipalities as a condition of approval may require proponent to enter into a development agreement regarding the condition and upkeep of local roads used as truck haul routes.	MNR
22	Conservation Data Centre Report	<p>Provincial Requirements</p> <p>Known rare species will not be impacted on the site/lands</p> <p>Related Provincial Safeguards</p> <p>The information provided in the assessment suggest that there will not be any conflicts with species protected under the Endangered Species and Ecosystems Act and/or Species at Risk Act or designated as rare or uncommon by the Manitoba Conservation Data Centre (MBCDC).</p> <p>NRIF's review is based on existing data known to the MBCDC of the Wildlife Branch at the time of the review. These data are dependent on the research and observations of our scientists and reflects our current state of knowledge. An absence of data does not confirm the absence of any rare or endangered species.</p> <p>Many areas of the province have never been thoroughly surveyed, however, and the absence of data in any particular geographic area does not necessarily mean that species or ecological communities of concern are not present. The information should, therefore, not be regarded as a final statement on the occurrence of any species of concern. All future observations of rare or endangered species made by the proponent should be reported to the MBCDC for further review.</p>	NRIF

Provincial Departments: Agriculture (AGR); Environment and Climate Change (ECC); Transportation and Infrastructure (MTI); Municipal and Northern Relations (MNR); Natural Resources and Indigenous Futures (NRIF)

D. PUBLIC COMMENTS AND DISPOSITIONS

Public Comment Summary	
Gerald & Patricia Wiebe Near Altona	Concerns regarding: <ul style="list-style-type: none">• Commenting on proposed livestock operations
Conrad Driedger <3 km NW of Proposed Operation	Concerns regarding: <ul style="list-style-type: none">• Local roads

A full copy of the public comments as well as the proponent's response may be viewed on the public registry at: https://www.gov.mb.ca/mr/livestock/public_registries.html

See Appendix B for the proponent's response to the public comments.

E. CONCLUSIONS AND RECOMMENDATIONS

Conclusion

The information contained in the Site Assessment submitted by the proponent generally meets provincial requirements. In addition, based on available information it has been determined that the proposed operation will not create a risk to health, safety or the environment, or that any risk can be minimized through the use of appropriate practices, measures and safeguards.

Recommended Actions to Council

1. As per Section 114(2) of The Planning Act, at least 14 days before the date of the hearing, Council must:
 - a) send notice of the hearing to
 - i. the applicant,
 - ii. the Minister (c/o the Morden Community Planning Office),
 - iii. all adjacent planning districts and municipalities, and
 - iv. every owner of property located within three kilometres of the site of the proposed livestock operation, even if the property is located outside the boundaries of the planning district or municipality; and
 - b) publish the notice of hearing in one issue of a newspaper with a general circulation in the planning district or municipality or, when there is no newspaper with a general circulation in the area, post the notice in the office of the planning district or municipality and at least two other public places in the district or municipality; and
 - c) post a copy of the notice of hearing on the affected property in accordance with the Posting Requirements outlined in Section 170 of The Planning Act.
2. Council should specify the type(s) of operation, legal land location, number of animals in each livestock category, total animal units, and expiration date (as per Planning Act section 110(1)) in its Conditional Use Order.
3. As per Section 117 of The Planning Act, Council must send a copy of its Conditional Use Order to
 - a) the applicant,
 - b) the Minister (c/o the Morden Community Planning Office), and
 - c) every person who made representation at the hearing.
4. Council may impose on the approval of this application a condition requiring the owner of the project site to enter into a development agreement under Section 107(1)(c) of The Planning Act. Such a development agreement may address matters including the construction or maintenance of roads or shelterbelts, at the owner's expense or partly at the owner's expense.
5. Council is requested to include in their resolution and/or Conditional Use Order notification that, as per Section 118.2(1) of The Planning Act, an applicant may appeal the following decisions of a board or council to the Municipal Board:
 - b) for an application for approval of a conditional use made in respect of a large-scale livestock operation,
 - (i) a decision to reject the application,
 - (ii) a decision to impose conditions.

6. As per Section 118, no development or expansion of a livestock operation that is the subject of an application under Part 7, Division 2 of The Planning Act may take place until
 - (a) the application is approved and the applicant complies, or agrees to comply, with any condition imposed on the approval under this Division; and
 - (b) the applicant obtains every approval, including any permit or licence, required under an Act, regulation or by-law in respect of the proposed operation or expansion, and complies with, or agrees to comply with, any condition attached to the approval.
7. Council is welcome to contact Manitoba Environment and Climate Change, Environmental Approvals Branch or Regional Environmental Compliance and Enforcement staff with respect to the Livestock Manure and Mortalities Management Regulation (M.R. 42/98) including compliance and enforcement issues.

Recommended Actions to Proponent

1. That any additional measures identified through subsequent provincial licencing or permitting in order to minimize any identified risks to health, safety and the environment be undertaken.
2. That as per Section 118.2(2)(b), an applicant may appeal the following decisions of a board or council to the Municipal Board respecting an application for approval of a conditional use:
 - i. a decision to reject the application,
 - ii. a decision to impose conditions.

F. TECHNICAL REVIEW COMMITTEE MEMBERS

Name	Department	Title Branch	Contact
Inonge Aliaga	Municipal and Northern Relations	Senior Planner <i>Community Planning Branch</i>	431-276-9741 inonge.aliaga@gov.mb.ca
Petra Loro	Agriculture	Livestock Environment Specialist <i>Sustainable Agriculture Branch</i>	204-918-0325 petra.loro@gov.mb.ca
Julie Froese	Environment and Climate Change	Environmental Livestock Coordinator <i>Environmental Approvals Branch</i>	204-945-7104 julie.froese@gov.mb.ca
Colin Murray	Natural Resource and Indigenous Futures	Information Manager- Manitoba Conservation Data Centre <i>Fish and Wildlife Branch</i>	204-945-7760 colin.murray@gov.mb.ca
Jeff DiNella	Transportation and Infrastructure	Senior Development Review Technologist <i>Highway Planning and Design Branch</i>	204-430-7176

Appendix A

Manitoba Agriculture – Sustainable Agriculture Branch – Land Assessment Details

Since the manure from the pig operations will also be applied to the land available for the poultry manure, the land assessment includes the manure nutrients (nitrogen and phosphorus) from the entire livestock inventory (pigs and poultry).

In areas of lower livestock intensity, such as the Municipality of Rhineland and the RMs of Morris and Roland, it is currently the Province of Manitoba's policy to require sufficient suitable land for all of the nitrogen and half of the phosphorus generated by the livestock. This policy assumes that more land is available in areas of lower livestock intensity to balance manure phosphorus with crop phosphorus removal, should it be necessary in the future.

Typical modern feeding practices for poultry and pigs were used to estimate nutrient excretion by the livestock at Horizon Colony Farms Ltd. Realistic long-term 10-year crop yields from the Manitoba Agricultural Services Corporation (MASC) for the Municipality of Rhineland and the RMs of Morris and Roland were used to estimate crop nitrogen uptake and phosphorus removal rates for the crop rotation specified in the proposal.

Land suitability is determined using soil testing for phosphorus and soil survey to establish the agriculture capability. Soils must be below 60 ppm Olsen P to be considered suitable. Detailed and reconnaissance soil survey is available in the area to determine the agriculture capability of the land. The soil survey indicates the land is predominantly Classes 2 and 3. The most significant limitations in the area are wetness (W) and salinity (N).

The estimated land requirement for Horizon Colony Farms Ltd. is 3202 acres for the phosphorus excreted by all of the pigs and poultry owned by the colony or 3016 acres for the nitrogen, whichever is higher. Horizon Colony Farms Ltd. has exceeded the land requirement by demonstrating that they have access to 5435 suitable acres. Additional details can be found in the appendix.

Manitoba Natural Resources and Indigenous Futures – Lands Branch

A review of the information provided suggests there is no impact to Crown land administered under The Crown Lands Act. This review is based on information known to the Lands and Planning Branch as documented in the Crown Lands Registry System.

Manitoba Environment and Climate Change – Water Science and Watershed Management Branch

Proper nutrient management applications that avoid excess loss of nutrients to surface waters are needed on lands receiving manure in southern Manitoba because long-term trend analysis of total phosphorus and total nitrogen has shown significant increases in these nutrients in the Assiniboine and Red rivers (Jones and Armstrong 2001).

The proponent is planning to apply solid manure in fall, broadcast and incorporated within 48 hours. Broadcast with incorporation will reduce the risk to surface water when compared to broadcast only application methods.

For most crops, manure contains an excess of phosphorus (P) compared to nitrogen (N) and, as a result, application at N-based rates causes a buildup of soil P. Practices which reduce N losses from the manure improve the N:P ratio in the manure and help slow P buildup when manure is applied at N-based rates. Incorporation is a practice which reduces N loss when compared to broadcast only application method.

The proponent has acknowledged the setback areas for all water features have been observed and excluded from land base calculations. Setbacks should be clearly communicated to and observed by those involved in manure application to minimize the risk of nutrients entering surface and groundwater.

Manitoba has included phosphorus (P) as a nutrient by which fertilizer application through manure, synthetic fertilizer, and municipal waste sludge to agricultural lands may be limited. Many agricultural soils in Manitoba, especially areas with low livestock intensity, are considered P-deficient and, therefore, manure is an ideal fertilizer to support crop production. However, manure application can increase soil P over time and other spread fields may need to be added to prevent excessive soil P build up. As excess P levels build up in soils, greater losses occur to surface and ground water. It should be noted that Olsen soil-test P levels of 60 ppm are well above P needs for most crops (over 20 ppm is usually considered agronomically very high). In areas of lower livestock intensity, such as the RM of Rhineland, it is currently the Province of Manitoba's policy to require sufficient suitable land for all of the nitrogen (N) and half of the P generated by the livestock. This policy assumes that more land is available in the region to balance manure P with crop P removal, should it be necessary in the future for long-term sustainability. To remain environmentally sustainable over a long-term planning horizon of 25 years or more, the proponent acknowledges that 6404 acres may be required for the operation. The proponent has identified 5435 acres with suitable soil test results for manure application at this time. Application to meet crop N requirements is estimated to use 3016 acres. Application at 2 times the crop removal of P is estimated to use 3202 acres (6404 acres is estimated to achieve P balance [P removal equal to P application] with current crop choices and yield potential). As P levels build up in soils, the concentration of P in runoff to surface waters increases. It is important to rotate manure application across all spread fields and whenever possible focus manure applications on fields with low Olsen-P soil test levels so as to prevent excessive P buildup when applying manure at rates above P balance (P removal by harvested crops).

During manure spreading, setback distances to all groundwater features as prescribed under the Livestock Manure and Mortalities Management Regulation should be considered as a minimum distance.

Appendix B



12 Aviation Boulevard
St. Andrews MB R1A 3N5
Canada
T: 204-334-8846
F: 204-334-6965
dgh@dghengineering.com

January 28th, 2025

Environmental Livestock Coordinator
Manitoba Environment and Climate Change
Environmental Approvals Branch
Transmitted by email: trc@gov.mb.ca

Dear Coordinator:

Re: Response to Public Concerns, Horizon Colony Farms Ltd (TRC 12-108).

On behalf of Horizon Colony Farms Ltd., I am responding to the public concerns raised to file TRC 12-108, and specifically the comments from Conrad Driedger submitted by email on January 14, 2025.

Horizon Colony Farms Ltd. is conscious of the road conditions surrounding the colony, and especially the vulnerability of the dirt roads to the north, west, and east of the colony. It is in the colony's own interest to ensure the efficiency of its operations that the impacts from these vulnerabilities be mitigated. With respect to the current hog operations, a drag line system is used to transport manure to fields for injection. This greatly reduces road traffic that can adversely impact the condition of roads. With respect to the transport of poultry manure for application to farm fields, again the colony is conscious of the potential impacts to dirt roads and can adjust routing and timing of these operations to mitigate these impacts.

If you have any questions or need any further information, please contact the undersigned. Otherwise, we appreciate the livestock technical review committee's work conducted to date in advancing the interests of Horizon Colony Farms and look forward to completing the remainder of the process.

Respectfully submitted,

DGH Engineering Ltd.

per:

Keith Duhaime, P.Ag.

cc: David Wurtz, djwhorizon@outlook.com