SOUTH-MAN
DESIGN GROUP LTD
Unit 8 – 851 Lagimodiere Blvd.
Winnipeg, MB. R2J 3K4
www.southmandesign.ca 204-668-9652

March 13, 2026

Attention: Technical Review Committee

Re: Harbour Colony (TRC 12-120) – Public Comment Responses

In consultation with the proponent, we have prepared the following responses to the comments received through the public review process. As many of the concerns expressed are similar in nature, we have prepared a single document with the intent to cover all of the concerns expressed to the best of our ability.

Site Identification:
As is the case when most colonies begin to develop a new site, the initial permit applications and correspondence are initiated under the name of the mother colony (in this case Crystal Spring Colony) or a numbered company (in this case 7317434 Manitoba Ltd.) if the property was purchased in anticipation of the need to start a daughter colony somewhere in the future. Since the start of the development process, it has been decided that the name of the new colony will be Harbour Colony and as such any subsequent permit applications have utilized this official name. In the comments provided there has been reference to Boundary Colony. The origin of this name is unknown as it does not appear on any of the previous applications and would therefore not be considered applicable to this application.

Animal Inventory:
The original Letter of Intent submitted to the Fisher-Armstrong Planning District identified that the intention was to establish livestock enterprises on the site. No specific mention was made as to size and species at that time, as these decisions are typically established based on market conditions and the availability and cost of quota in supply management systems such as dairy, poultry and egg production. The Letter of Intent also went on to identify that the establishment of any livestock operations would be regulated through the Conditional Use and Provincial Technical Review Processes. This is the specific process that has been followed to date.

Within the Environment Act Proposal for the domestic lagoon, it was identified that the proposed abattoir would process 6000 chickens, 2000 ducks/turkeys, 500 hogs and 25 cattle. The intent was not to infer that these number of animals would be all that would be housed on site but rather used to establish the capacity of the abattoir and ensuing wastewater treatment needs. The proposed poultry inventory included in the Conditional Use constitutes the plans of the colony for a significant period of time into the future. If additional livestock species would want to be added, the Conditional Use and TRC processes will need to be reinitiated. Those animal species identified to be processed within the abattoir that are not within the current conditional use will be sourced either locally or from the mother colony and brought from off-site for processing.

Groundwater Resources:

Water usage for all development will be licensed through the Water Licensing Branch of Manitoba Environment and Climate Change based on the expected daily usage exceeding 25000L/day. As part of this licensing process the volume of use is taken into consideration and used to assess the impact on the aquifer and adjacent water uses. In situations where it is determined that the use will be a detriment to the aquifer or adjacent neighbours, limitations will be placed on the applicant, or they will be directed to consider alternative water sources such as surface water collection and/or increased efforts in water conservation.

Like the surrounding community, Harbour Colony will be dependant on the same groundwater resources for their daily domestic and agricultural needs. With the intent of occupying this site indefinitely, it is in the best interest of the colony to protect this water source for both them and the community for the future. The wells in the immediate area draw their water from the limestone aquifer approximately 120’ below the surface. This significant overburden will provide substantial protection against any surface activity. The wells developed on site are also situated approximately 2000 feet from the livestock facilities and in a location which would never receive any manure application, thereby affording the confidence that the livestock operation will have no impact on these wells and the groundwater resources that they draw on.

Surface Water Resources and Wetlands:

The proposed residential, agricultural and commercial develop situated on 28-18-3E has required several Class 3 (seasonal) wetland areas to be drained in order to facilitate structures and infrastructure. A licence to conduct the drainage that has occurred thus far has been obtained through Manitoba Environment and Climate Change. As part of this licencing process, compensation has been paid to Manitoba Habitat Heritage Corporation. The intent of this assign fee is to utilize these funds to reconstruct new wetland areas equal to or greater in area than the wetland area that had been removed. This similar process will be followed in the event that additional wetland area is required to be drained.

The utilization on confined livestock facilities and the absence of on-site manure storage facilities minimize the potential for any nutrient or manure runoff from the site and the potential for impact

to surface water sources. Site selection for field storage of manure will be very particular to protect against the potential for flooding and areas not prone to runoff. Minimum setbacks as stipulated within the Livestock Manure and Mortalities Management Regulation M.R. 42/98, will be met or exceeded. If conditions exist, that require additional protection, temporary earthen berms can be utilized to further protect any manure stockpiles from being impacted. Regulatory requirements also stipulated that field stored manure can not be stored in the same location and must be moved annually to prevent the accumulation and migration of nutrients deep within the soil profile and that a crop be established where the pile was located in the subsequent year to ensure that any deposited nutrients are utilized by that crop.

As with most solid manure sources, it is proposed that the manure from the proposed poultry operations will be field applied using solid manure spreaders and incorporated into the soil utilizing cultivation or deep tilling equipment that will incorporate the manure beneath the soil surface. The intention is to have this tillage performed within 48 hours of application to minimize nitrogen loses, reduce odour potential and tie up the manure within the soil profile to protect against runoff and erosion. Application within areas known to be subject to flooding and in close proximity to drains and ditches, will be avoided at all times. The manure will be applied at agronomic rates, where the nutrients are applied at rates consistent with the uptake and utilization potential of the crop to be grown the following year. Through this practice, the potential for excess nutrient accumulations and the potential for nutrient runoff is minimized. Riparian areas where present will be maintained and where thought to be beneficial will be established within fields to act as buffers and interceptors to capture and filter any runoff from spreading fields. In combination, all of these factors will maximize the protection to surface water.

Manure and Nutrient Management:

The Livestock Manure and Mortalities Management Regulation (M.R. 42/98) (LMMMR) was established by the provincial government to regulate all aspects of the manure and mortalities associated with livestock operations. The LMMMR ensures that livestock manure and mortalities are managed in a manner that protects the environment and includes such items as manure storage, field application of manure nutrients, mortality storage and disposal methods, and surface and groundwater protection. The regulation also has the provision for Manitoba Environment Officers to provide ongoing oversight to monitor compliance and investigate complaints and thereby ensure that a livestock producer is adhering to the regulation.

Based on the size of the proposed poultry facilities, it will be required that the colony submit an annual manure management plan to the province prior to field applying any manure. Through this process, the operation is monitored with respect to manure application methods and nutrient levels within the soil to ensure compliance with the LMMMR and long-term sustainability. The potential effects on the environment of nutrients within manure are no different than commercial fertilizers. However, there is a significant difference in the regulation of manure applied nutrients versus commercial fertilizers. The annual submission of a manure management plan and soil

nutrient test results is a means to control and monitor nutrient concentrations in the soil on an annual basis. This same monitoring and accountability does not exist with the application of commercial fertilizers.

The current regulatory requirements require a land base of approximately 1201 acres for the utilization of the P2O5 produced by the proposed poultry operations. Harbour Colony has 3481 acres of land available after the reduction for setback distances during manure application and areas of fields known to be prone to regular flooding or inundation. This excess of acres provides the flexibility to selectively store and apply the manure generated, in areas that are least likely to have any negative environmental impacts and minimal impact on surrounding residents. The desire and intent are to refrain from spreading manure in close proximity to residential developments within the RM of Gimli and major drainage ways that lead directly to the lake.

Odour Production and Control:

The proposed poultry barns will be totally enclosed housing, meaning the birds will not have access to the outside at any point in the production cycle. The environments within the barns will be mechanically controlled ensuring adequate air exchange to maintain good air quality and temperature controlled for optimum bird comfort. Manure removal will occur every several days from within the laying operation in order to ensure that the manure remains aerobic and the production of odour causing constituents such as ammonia and hydrogen sulphide are minimized. Manure from the broiler barn consist primarily of bedding material such as straw and is managed to remain dry to also ensure a suitable environment for the birds. This bedding/manure mixture will be removed at the end of each batch and is generally very dry and unoffensive. Adequate ventilation, frequent manure removal, and the absence of anaerobic manure will all contribute to minimizing odour production. With the proposed separation distance to neighbouring residences and presence of forested area, it is not anticipated that there will be any measurable odour impact. In fact, the colony residences would be the most likely to be impacted due to the proximity and high frequency of winds blowing from the south through to the westerly directions.

Odour production during field application, would also be considered generally inoffensive, when the manure has been properly composted during the storage period. This composting action is achieved typically by “turning” the piles several times throughout storage period between spring and fall. This composting process minimizes the ammonia and hydrogen sulphide attributing to the odour that would be most notable and offensive. A system by which bedding material from the broiler barn is introduced with the layer manure within the field, will aid in the overall composting process and significantly reduce the potential for odour production.

Mortality Management:
Composting of naturally occurring mortalities is generally the most widely used method of disposal for poultry producers. The colony propose to construct a permanent composting facility with a concrete foundation and enclosure to make management of the composting process more controllable and predictable, while also providing protection to the environment and predation from wildlife. When completely composted, the composted product will be field applied in a fashion similar to the manure. No increase in wildlife activity would be expected with the use of a secure composting facility.

Animal Welfare:
The laying hens will be housed in an aviary style housing system which affords the 5 freedoms. The 5 freedoms include, freedom:

1) From Hunger and thirst
2) From Discomfort
3) From Pain, Injury and disease
4) To express normal behaviour
5) From fear and distress

The proposed laying aviary system conforms to the Animal Welfare Act and is consistent with industry standards within Canada. The proposed systems for feed, water and air quality within both the layer and broiler barns would be considered the latest technology and affords the best conditions available for optimal animal comfort and health.

Several comments were received with respect to the occurrence of bird influenza and the impacts that the proposed poultry operations would have on wildlife species. It should be noted that the bird flu is a naturally occurring disease within wildlife foul, not a disease present within domestic foul that is transmitted to wildlife. The transmission of this disease from wildlife to the proposed domestic flock is of considerable concern to Harbour Colony, as an outbreak has significant economic implications. Tight biosecurity protocols will be maintained on site to minimize the potential for such an outbreak.

Acknowledgement of Support:

Members of Crystal Spring Colony and Harbour Colony would like to express appreciation to those that submitted letter to the TRC in support of their application. As was described in these letters, the desire of the colony is to actively participate in the community to make it better for everyone. Part of their belief system is to help others in need, and consequently they can often be found volunteering or providing in charitable ways. It is not uncommon for colonies to have their own fire fighting, and winter road clearing equipment, which through coordination with the Municipality have been utilized during times of need. Inevitably, the goal of the colony is to live harmoniously together with the surrounding community and provide a safe environment and financially sustainable future for many generations to come.

Respectfully Submitted;

South-Man Design Group Ltd.

Crystal Spring Colony

Harbour Colony