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March 19, 2026

Attention: Technical Review Committee

Re: Harbour Colony (TRC 12-120) – Response To RM of Gimli

We have prepared the following responses to the comments received through the public review process from the RM of Gimli. The responses have been provided in sequence, following the questions or concerns expressed.

Q1. What are the specific Agricultural Capability Ratings (CLI) for the designated spread fields? Are any classified as 4W, 5W, or 6W (poorly drained), which the Manitoba Nutrient Management Regulation typically restricts for nutrient application?

Response: The agricultural capability class and subclass are identified on the Manure Application Field Characteristic Table within the site assessment submission. Fields identified to receive manure application do contain areas with the classes identified. Having farmed the land to receive manure during the recent years of extreme rainfall events and snowmelt, Harbour Colony are aware of and have mapping of areas known to be subject to regular flooding or limitations in crop production and would not intend to apply manure within these zones. Sufficient land base is available to sustainably apply manure on this selective basis.

Q2. In the event of an unseasonable spring flood or a "one-in-fifty-year" rain event, what is the contingency plan if the fields are too saturated to incorporate manure within the required 48-hour window?

Response: Field application of manure will be scheduled at times when field and weather conditions are favourable for application and incorporation in the shortest period possible. With the proposed field storage, in the event that these favourable conditions are not available, application can be delayed until such time that desirable field and weather conditions are available. In the event that the manure has been spread and was unable to be incorporated,

measures will be taken to restrict or eliminate the potential for runoff from leaving the property. This can be accomplished through temporary dykes or blocking of culverts in extreme situations.

Q3. The proposal mentions removing a Class 3 wetland (0.12 acres). Class 3 wetlands (seasonal ponds) are highly effective at trapping phosphorus during the spring melt. How will the loss of this natural "nutrient sink" be offset to prevent an increase in the net phosphorus export to the nearby Willow Creek and/or Lake Winnipeg?

Response: The proposed development 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 is that the Manitoba Government will 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.

Q4. Poultry manure has a significantly higher concentration of phosphorus than other livestock waste. Has a Phosphorus Index (P-Index) been calculated for the specific topography of the Husavik Road site and the locations for land application of poultry manure? This would account for the risk of Phosphorous transport based on slope and proximity to surface water, rather than just soil test levels.

Response: Field application of phosphorus for crop production, regardless of source, has similar potential for escaping the property if applied incorrectly or in excess. Testing of manure samples will determine the phosphorus and nitrogen content, and application rates will be adjusted based on these levels. Responsible nutrient application, including application rate and method of application will ensure that the risk of loss is minimized.

Q5. What are the current baseline Phosphorous soil test levels for the proposed application fields? If levels already exceed the limit, will the colony commit to a "Phosphorous-removal" application rate (matching crop uptake) rather than a nitrogen-based rate?

Response: The soil test results for the parcels identified for manure application have the current phosphorous levels identified. None of the parcels identified have phosphorus levels in excess of allowable levels. Should the circumstance occur where the phosphorus levels are approaching or exceeding the maximum levels, manure application rates will be adjusted to reduce nutrient application levels, or ceased to rapidly decrease nutrient levels.

Q6. The application states manure will be "plowed in" within 48 hours. Is there a requirement for immediate incorporation (e.g., within 24 hours) during high-risk periods to prevent volatilization and surface runoff?

Response: It is intended to incorporate the manure applied as quickly as possible following application. Due to the dry nature of poultry manure, it is expected that the manure will be incorporated almost immediately following application. In many cases this will be the same day or at least the following day.

Q7. The plan involves "field storage" of dry manure. How will these temporary piles be protected from snowmelt runoff? Will they be placed on high ground with a minimum setback from Order 1 or 2 drains that lead directly to the lake?

Response: Field stored manure will be piled in areas known to be outside of areas subject to flooding, which in most cases would constitute the highest point within a field. Minimum setback distances as established by MB Environment and Climate Change from surface and groundwater sources will be adhered to. If necessary, temporary dykes can be constructed around stockpiles to protect against runoff from snow melt or excessive rain.

Q8. Will the colony maintain permanent vegetative buffers (grass strips) between the spread fields and the road ditches or creeks? Research shows that permanent vegetation is significantly more effective at trapping phosphorus than the standard 3-meter setback required by law.

Response: Existing riparian and vegetative buffers will be maintained as an additional protective measure against nutrient runoff. In areas known to be subject to regular runoff, the establishment of a riparian area will be considered on fields where manure application is to occur.

Q9. How does the nutrient load from the 140,000-bird poultry operation interact with the proposed wastewater lagoon and abattoir for the 250-person colony? What is the total combined nutrient output for the entire property at full build-out?

Response: The Farm Excretion table within the Site Assessment submission provides an estimate of the anticipated nutrient production levels. Nutrients generated from the proposed abattoir and colony members has previously been determined in the Environment Act Proposal for the domestic lagoon.

Q10. Will the proponent install downstream monitoring wells or surface water sampling stations at the edge of the property to verify that nitrogen and phosphorus are not leaching into the local

aquifer or drainage network? The Harbour Colony proposal (TRC 12-120) indicates that manure will be transported to fields in the Rural Municipality of Gimli ("Gimli"), including areas near the Gimli Airport, Husavik Road, and Siglavik, MB.

Response: The absence of a manure storage or manure stockpile on the proposed development site does not warrant the installation of monitoring wells or surface sampling stations. It is therefore not intended to install any of these features at this time.

Q11. Has a formal traffic impact study been conducted for the transport of 140,000 birds' worth of poultry litter annually? How many tandem or semi-truck trips will occur on Gimli's municipal roads (like Seagram or Husavik Rd) during the fall spreading window?

Response: A traffic study has not been conducted as intense road usage is not proposed and the need for intensive manure hauling during the spring or fall application windows does not exist. Field stored manure will be hauled from the barns to the receiving spread field intermittently during the production cycle thereby eliminating intense road usage. During manure application all traffic will be contained to the field and not require any significant road traffic other than mobilizing and demobilizing equipment from site.

Q12. Will the proponent enter into a Road Use Agreement with the Gimli to cover the cost of accelerated road degradation caused by heavy hauling, even though the farm's tax base is in Armstrong?

Response: At this time there is no intent to enter into a Road Use Agreement with the RM of Gimli. Property taxes are paid within the Gimli municipality and much of the construction traffic is based on products coming from suppliers within the Rm of Gimli. If construction activities lead to deterioration of local roads, open conversation can be had to consider some form of restitution.

Q13. Poultry litter is a dry, dusty product. What is the operational plan for dust suppression on gravel roads in Gimli when hauling through residential or airport zones?

Response: Dust production from the manure products being conveyed to field storage is minimal to non-existent. Manure from the layer and pullet barns is not dry enough to generate dust, and manure and bedding from the broiler barn will be hauled in gravel trailers. Tarps typical of gravel trailers will be utilized to cover this product more so to eliminate any losses but at the same time will accomplish any required dust control.

Q14. Since the land slopes toward Lake Winnipeg (through Gimli), any drainage improvements made on the Armstrong site (to protect the barns from flooding) will increase the volume and velocity of water entering Gimli's culverts. Will the proponent pay a Drainage Levy to Gimli to upgrade downstream culverts?

Response: Drainage improvement to date have been coordinated with the local RM and the Manitoba Government. Where necessary Harbour Colony will make financial contribution to these works.

Q15. The operation will draw significant groundwater (140,000 birds + 250 residents). Has a hydrogeological study confirmed that this draw won't interfere with the water table of neighboring residential wells in Gimli?

Response: A hydrogeological study was conducted by Friesen Drillers. This report has previously been submitted to government officials. This report determined that there would be no anticipated impacts on surrounding residences.

Q16. If residents in Siglavik, MB or Miklavik, MB report odor or illegal spreading during a flood, the By-law Enforcement or environmental reporting burden often falls on the local municipality (i.e Gimli) . Will the colony fund an independent thirdparty monitoring program for water quality in Willow Creek to remove the cost burden from the Gimli?

Response: Any such complaints should be filed with either MB Environment or MB Agriculture. These complaints are investigated by the corresponding department at no known cost to the municipality. In a case such as this, if the proponent is found to be accountable for the complaint, the investigating department can enforce compliance or correction of the infringement.

I trust these responses will be sufficient to address the concerns expressed, however should further questions or concern exist please reach out to myself or the proponent.

Respectfully Submitted;

South-Man Design Group Ltd.

Crystal Spring Colony

Harbour Colony