#### SUMMARY OF COMMENTS/RECOMMENDATIONS

**PROPONENT:** Central Manitoba Resource Management

Limited

PROPOSAL NAME: Jackson Brothers and Jackson/Delf

**Irrigation Projects** 

CLASS OF DEVELOPMENT: Two

TYPE OF DEVELOPMENT: Water Development and Control

**CLIENT FILE NO.:** 4959.00

# **OVERVIEW:**

The Proposal was received on June 24, 2003. It was dated March 31, 2003. The advertisement of the proposal was as follows:

"A Proposal has been filed by Central Manitoba Resource Management Ltd. (a holding company formed by Central Manitoba Irrigators Association Inc.) to irrigate up to 473 ha (1170 acres) annually in rotation on a land base of 1373 ha (3392 acres). The Jackson Brothers project is located northwest of Treherne between PTH 2 and the Assiniboine River. The Jackson/Delf project is located south of the Assiniboine River and east of PR 242. Approximately 840 dam<sup>3</sup> (680 acre-feet) of water would be applied annually, using water obtained mainly from the Assiniboine River. Some water would be obtained from an existing reservoir in NE 16-8-10W. Construction on the project would begin in the summer of 2003, and continue in stages through 2005 and beyond. Operation each year would generally be between mid June and early September."

The Proposal was advertised in the Treherne Times on Monday, July 14, 2003. It was placed in the Main, Centennial, Eco-Network and Portage la Prairie City Library public registries, as well as in the office of the R. M. of South Norfolk as a registry location. It was distributed to TAC members on July 7, 2003. The closing date for comments from members of the public and TAC members was August 11, 2003.

#### **COMMENTS FROM THE PUBLIC:**

<u>La Salle Redboine Conservation District</u> Our main concern with this project are those stemming to responsible management of light soils.

Potato production is a low residue crop and with many producers removing shelterbelts and tree lines in favour of irrigation pivots, soil becomes readily transportable. Please

consider the significant impact that soil erosion can have on our landscape, when implementing your environmental management plan.

We are also concerned with the potential destabilization that may result from removing vegetation along the Assiniboine River, these soils are also very light and readily eroded leading to sedimentation problems, property loss and declining water quality. Perhaps a river bank management plan to minimize negative impacts should be considered as part of this process. (i.e. revegetation, rip-rap placement etc.)

# Disposition:

Erosion prevention has been addressed in the planning of the project through the preparation of soil management plans for each land parcel and crop. Riparian protection can be addressed through licence conditions.

# **COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:**

Manitoba Conservation – Sustainable Resource Management

Practices should be adopted to conserve water and improve crop response to water applied. Best Management Practices should also be developed to avoid runoff of sediments and nutrients to adjacent surface water. Any future monitoring programs and costs associated with this should be the responsibility of the proponent. The proponent should provide a nutrient management plan and a pesticide and insecticide management plan. The proponent should supply construction drawings and specifications for the installation of the pipelines.

## Disposition:

Nutrient and pesticide management are addressed in the Proposal. Other comments can be addressed as licence conditions.

**Historic Resources Branch** No concerns.

Mines Branch No concerns.

**Highway Planning and Design** No concerns.

<u>Soils and Crops Branch</u> On behalf of Manitoba Agriculture and Food, I have reviewed the above Environment Act Proposal. Previously I had reviewed the document referred to in the proposal – "Jackson Brothers Land-Use and Agronomic Assessment, March 2002" and provided comments to the author, Tone Ag Consulting. These comments are referenced in Appendix C of the proposal with the Tone Ag Consulting responses to these comments in Appendix D.

I would like to provide the following comments on the proposal:

- <u>1. Section 8. References</u> It should be noted that "The Best Management Practices Manual" Draft referred to here and elsewhere is merely a DRAFT, which, from MAF's perspectives, still requires considerable refinement.
- 2. Section 4.1.3 Salinity and Section 5.1.2 Soil Monitoring In the report, saline phases of two soil series have been identified on two separate fields. Field 5 contains approximately 30% Neuhorst Saline Phase and Field 12 contains a small area of Prodan Saline Phase. The risks associated with irrigation of saline soils have been identified and, it is these fields at a minimum that should have further investigation on the extent and severity of salinity and, if significant and feasible, these areas should be avoided for irrigated production or, at the very least be areas identified for ongoing monitoring.
- 3. Section 6-Recommendations for Further Study It has been noted that Fields 10 and 33 "are marginal for potato production" and Field 5 "is a concern due to salinity". I concur. This was previously identified in the Tone Ag Consulting "Land –Use and Agronomic Assessment" Report.

As noted in Appendix C, I provided comments on these fields as follows:

"Field 5 contains about 30% of a soil with a salinity concern."

"Field 10 is predominated by soils with a General Irrigation Rating of Fair and Poor and a Suitability for Irrigated Potato Production rating of 5" (98%).

"Field 33 has a significant area (70%) of soils with a General Irrigation Rating of Fair and Poor and with 37% rated 5 in terms of Suitability for Irrigated Potato Production"

In conclusion I stated: "these fields or *portions of them* should not be considered for irrigation". Subject to my comments in the previous section re: salinity in Field 5, and, recognizing that Tone Ag Consulting provided a response to these concerns (Appendix D), this conclusion still holds.

## Disposition:

These comments can be addressed as licence conditions. The area to be irrigated can be limited for fields 5 and 33. Field 10 can be excluded from irrigation.

Manitoba Health - Assiniboine and Brandon Regional Health Authorities – Medical Officer of Health 
Monitoring of groundwater and surface water is addressed in Section 5 the document. Monitoring of domestic wells should be included in the proposal as well.

## Disposition:

Domestic well monitoring is not necessary for every irrigation project. This issue can be addressed separately in the future if necessary.

Canadian Environmental Assessment Agency DFO and the Canadian Coast Guard have notified us that additional information is required prior to determining whether an environmental assessment under the Canadian Environmental Assessment Act will be required with respect to the project. Documentation is attached from DFO which outlines the information required. In accordance with the Canada-Manitoba Agreement on Environmental Assessment Cooperation, please contact the DFO and CCG representatives noted on the attached responses as soon as possible to coordinate the collection of this information. In the interim, please ensure coordination of the assessment activities with DFO and CCG, until a firm determination can be made. DFO, CCG, and Environment Canada would be able to offer specialist information. DFO and CCG would like to participate in the provincial review.

# **ADDITIONAL INFORMATION:**

CCG information requirements were provided to the Proponent through CEAA. DFO and CCG regulatory approvals can be addressed through licence conditions. No additional information is required to address provincial TAC comments.

#### **PUBLIC HEARING:**

No requests were received for a public hearing. Accordingly, a public hearing is not recommended.

## **RECOMMENDATION:**

All comments received on the Proposal can be addressed as licence conditions. Therefore, it is recommended that the Development be licensed under The Environment Act subject to the limits, terms and conditions as described on the attached Draft Environment Act Licence. It is further recommended that enforcement of the Licence be assigned to the Red River Region.

#### PREPARED BY:

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Environmental Approvals - Environmental Land Use Approvals

September 25, 2003

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