

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Rural Municipality of East St. Paul

PROPOSAL NAME: Rural Municipality of East St. Paul
Groundwater Supply System

CLASS OF DEVELOPMENT: Two

TYPE OF DEVELOPMENT: Water Development and Control

CLIENT FILE NO.: 5378.00

OVERVIEW:

The Proposal was received on December 12, 2008. It was dated September 22, 2008. The advertisement of the Proposal was as follows:

“A Proposal has been filed by the Rural Municipality of East St. Paul for the operation of the municipality’s groundwater supply system. The system consists of four wells in an overburden sand and gravel deposit near Oasis Road immediately east of the Red River Floodway and south of the Springhill Ski area, a well in the Carbonate Aquifer in the same location, a well in the Carbonate Aquifer near Wenzel Street south of PTH 59, a water treatment plant and reservoir at the same location as the Wenzel Street well, a raw water pipeline connecting the Oasis Road and Wenzel Street facilities, and a distribution system providing treated water to portions of the Birds Hill community, including residents near Hoddinott Road and Pritchard Farm Road. The water treatment plant provides chlorination only for the system. The system currently serves about 25% of the residences in the municipality, with an average demand of 8.2 litres/second. Over the next ten years, it is anticipated that demand could be doubled to an average of 16.4 litres per second. The increased demand would be met primarily through additional use of the existing facilities. Additional groundwater supplies could be required later in the ten year planning period to accommodate peak demands and backup needs.”

The Proposal was advertised in the Winnipeg Free Press on Saturday, December 20, 2008. It was placed in the Main, Millennium Public Library (Winnipeg), and Manitoba Eco-Network public registries. It was distributed to TAC members on December 16, 2008. The closing date for comments from members of the public and TAC members was January 28, 2008.

COMMENTS FROM THE PUBLIC:

No public comments were received.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Manitoba Conservation – Sustainable Resource and Policy Management Management Branch No concerns.

Manitoba Conservation - Parks and Natural Areas Branch No comments

Manitoba Water Stewardship – Planning and Coordination Branch

- The Water Rights Act indicates that no person shall control water or construct, establish or maintain any “water control works” unless he or she holds a valid licence to do so. “Water control works” are defined as any dyke, dam, surface or subsurface drain, drainage, improved natural waterway, canal, tunnel, bridge, culvert borehole or contrivance for carrying or conducting water, that temporarily or permanently alters or may alter the flow or level of water, including but not limited to water in a water body, by any means, including drainage, OR changes or may change the location or direction of flow of water, including but not limited to water in a water body, by any means, including drainage. If a proposal advocates any of the aforementioned activities, an application for a Water Rights Licence to Construct Water Control Works is required. Application forms are available from any office of Manitoba Water Stewardship.
- The proponent needs to be informed that if the proposal in question advocates any construction activities, erosion and sediment control measures should be implemented until all of the sites have stabilized.
- The report mentioned hydrocarbon contamination had happened to the water supply in the Village of Birds Hill (section 2.5.1 on page 4). Where is the location of hydrocarbon contamination and how far it is from PW7? Is there any potential for this contamination to impact PW7?
- It is indicated that the Oasis Road wells are 50 to 100 m west of the pond in the former pits at Oasis Road (section 3.4 on page 19). Although no GUDI (Groundwater Under Direct Influence of Surface water) analysis was conducted, the Turbidity and Bacteria were monitored on the raw water entering the treatment plant (section 2.6.8 on page 13). What was the worst Turbidity and Bacteria recorded? Which kind of surface runoff conditions were occurring when elevated Turbidity and Bacteria were measured? Is there a need to do the GUDI study?
- What is the overburden thickness and material underneath the pit ponds at Oasis Road and at Birds Hill Village? Two bedrock wells PW7 and PW8 are very close to the two pit ponds respectively, do we need to do the GUDI study for the two bedrock wells?

- Figure 3 shows the drawdown of well PW7 and Figure 8 illustrates the drawdown of well PW8. What is the cumulative drawdown if PW7 and PW8 operate at the same time? During a drought cycle (lowest groundwater level), what would the impact of this cumulative drawdown be on the nearby domestic users and RW4? Would there be a need for pumps to be lowered in some wells?
- There are several existing monitoring wells shown on Figure 3. What is the frequency of water level and quality measurement? Do these monitoring wells form a comprehensive monitoring system or is there a need to add additional observation wells?
- In table 1, “Wells PW1, 2, 5 AND 6” (row3 and column2) should be “Wells PW1, 4, 5 AND 6”.
- If vegetation is removed during construction, the proponent should revegetate exposed areas along banks of surface drains/rivers.
- Should the wells be defined as GUDI, provisions should be taken to ensure the inactivation of Giardia lamblia and Cryptosporidium by means of ultraviolet (UV) disinfection.
- It appears that the existing water supply system will undergo significant changes and modifications. Manitoba Water Stewardship’s Office of Drinking Water should be provided with drawings and specifications prior to any such changes being made. A Permit to Alter/Construct may be required pursuant to The Drinking Water Safety Act and related regulations.

Disposition:

These comments were provided to the proponent’s consultant for information. Additional information was requested to address several comments. With respect to hydrocarbon contamination, Manitoba Conservation’s Central Region staff provided informal comments indicating that the project should not have any impact on groundwater contamination from hydrocarbons.

Historic Resources Branch No concerns. If at any time however, significant heritage resources are recorded in association with these lands during development, the Historic Resources Branch may require that an acceptable heritage resource management strategy be implemented by the developer to mitigate the affects of development on the heritage resources.

Mines Branch No concerns.

Manitoba Infrastructure and Transportation, Highway Planning Branch No concern.

Canadian Environmental Assessment Agency We have no interest at present in the project as proposed. Since the project consists only of licensing existing infrastructure, with no federal decisions attached, we have no environmental assessment interest in this project under the Canadian Environmental Assessment Act. Further, I understand that any additional wells or other infrastructure related to this project will require a separate proposal under the provincial legislation, and we will have the opportunity to review the project at that time for issues of federal interest.

ADDITIONAL INFORMATION:

Additional information was requested from the Proponent's consultant on February 2, 2009 to address several TAC comments. An e-mailed response dated February 12, 2009 was received. The request and response follow:

Information Requested:

1. Is there any evidence from existing monitoring to suggest that any of the wells of the East St. Paul system are affected by surface water, particularly by the gravel pits adjacent to Oasis Road? Is a Groundwater Under the Direct Influence of Surface Water (GUDI) analysis needed for any of these wells?
2. Is there a cumulative impact from the operation of both of wells PW7 and PW8 that would affect any other wells?
3. Are any additional monitoring wells needed for the existing water supply system?

Response:

1. There is not evidence from existing monitoring to suggest that any of the wells of the East St. Paul system are affected by surface water, however there is limited data available to review. The existing data would not be sufficient to be able to reach the conclusion that the wells were not GUDI.
2. The cumulative impact from the operation of PW7 and PW8 is not anticipated to adversely affect other wells. This issue will be addressed in the water rights licensing process.
3. No, additional monitoring wells are not needed, however there are presently no requirements for ESP to take samples or groundwater levels from monitoring wells. Two monitoring wells owned by ESP and numerous wells owned by the Floodway authority or the Province are available for monitoring should it be required.

Remaining comments identified by the TAC can be addressed either through Environment Act licence conditions, or through conditions provided through approvals through Manitoba Water Stewardship with respect to the Water Rights Act and the Drinking Water Safety Act.

PUBLIC HEARING:

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

RECOMMENDATION:

All comments received on the Proposal have been addressed through additional information, provided to the proponent's consultant for information or can be addressed as licence conditions in an Environment Act Licence or other provincial approval. 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 Central Region.

PREPARED BY:

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