

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: City of Brandon
PROPOSAL NAME: Brandon Water Treatment Facility Upgrades
CLASS OF DEVELOPMENT: 3
TYPE OF DEVELOPMENT: Waste Treatment and Disposal
CLIENT FILE NO.: 6180.00

As part of the [environmental assessment and licensing process](#), the purpose of this document is to summarize comments received from the public and government's Technical Advisory Committee (TAC), and how they are addressed. It includes a recommendation to inform the Minister's licensing decision.

INTRODUCTION

City of Brandon submitted a proposal dated March 23, 2023, to upgrade its water treatment facility located at 108 26th Street North in Brandon, Manitoba. The upgrades include a new water intake on the Assiniboine River, two raw water storage cells, a dual train membrane treatment process to supplement the existing treatment process, and other related upgrades to the existing facilities. The expanded capacity of the water treatment plant would be 50.2 million litres per day and is sufficient to meet the City's maximum daily water demand until 2048.

The proposal was advertised in the Brandon Sun and Brandon Westman on April 15 and April 20, 2023, respectively. It was placed in the online Public Registry as follows: <https://www.gov.mb.ca/sd/eal/registries/6180/index.html>.

The proposal was distributed to Technical Advisory Committee (TAC) members on April 12, 2023.

The closing date for comments from members of the public and TAC members was May 15, 2023.

The original proposal was for a Class 1 Environment Act Licence. The department requested additional information to supplement the original proposal. These addendums, now available on the public registry, were necessary for a thorough review of the City's submission and contributed to delays in the processing timeline. The proposal was upgraded to a Class 3 Environment Act Licence as the City is diverting more than 10,000 dam³ of water per year from the Assiniboine River.

COMMENTS FROM THE PUBLIC

The department did not receive any public comments on the proposal during the comment period.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE

TAC responses are listed in Table 1 below. Substantive comments and their dispositions follow the table. TAC comments are provided in full in the department's online public registry at <https://www.gov.mb.ca/sd/eal/registries/6180/index.html>.

Table 1 Brandon Water Treatment Facility Upgrades
Technical Advisory Committee Comments

No	Technical Advisory Committee Member	Response Provided
1	Environment and Climate Change	
	Environmental Approvals Branch	
	• Air Quality Management	No response
	Environmental Compliance and Enforcement Branch	
	• Regional Office	April 17, 2023
	• Hazardous Waste Program	No response
	Office of Drinking Water	May 12, 2023
	Environmental Programs and Remediation Branch	No response
	Drainage and Water Rights Licensing Branch	
	• Water Use Licensing Section	June 28, 2023
	• Drainage and Water Rights Licensing Section	May 2, 2023
	Water Science and Watershed Management Branch	
	• Water Quality Management Section	June 1, 2023
	• Groundwater Management Section	No response
	Climate Change and Clean Technology	No response
	Parks Branch	No response
2	Economic Development, Investment, Trade and Natural Resources	
	Wildlife and Fisheries Branch (wildlife)	No response
	Wildlife and Fisheries Branch (fisheries)	No response
	Forestry and Peatlands Branch	April 17, 2023
	Lands and Planning	No response
	Crown Land Specialist	No response
	Mines Program	No response
	Petroleum Program	May 15, 2023
3	Sport, Culture, Heritage and Tourism - Historic Resources Branch	May 11, 2023
4	Municipal and Northern Relations	
	Community Planning Branch	No response
5	Transportation and Infrastructure - Environmental Services and Consultation Branch	May 15 & 26, 2023
6	Health, Seniors and Long-Term Care – Winnipeg Regional Health Authority	May 12, 2023

Office of Drinking Water

The Office of Drinking Water has the following requirements:

- Permit to Construct or Alter a Public Water System for the Office of Drinking Water will have to be submitted and issued under The Drinking Water Safety Act and related regulations.
- An Operating Licence Amendment application will have to be submitted and issued under The Drinking Water Safety Act and related regulations.
- The Compliance Plan submitted by the City of Brandon to the Office of Drinking Water in December 2022 provided timelines for this project, which included the implementation of corrosion control, and these timelines appear to have been revised in the Environment Act Proposal. The Office of Drinking Water will follow-up directly with the City of Brandon.

Recommendations:

- Design details for the raw water upgrades must be communicated to the Office of Drinking Water, and the zebra mussel protection should be incorporated into the design.

Disposition:

These comments were shared with the proponent for additional information and the Office of Drinking Water will be following up directly with the City of Brandon. The draft licence also includes a clause that requires the proponent to obtain the required approvals for altering the water system and to follow The Public Health Act, The Drinking Water Safety Act, and all operating requirements as recommended by Manitoba Environment and Climate Change.

Water Use Licensing Section

The Water Rights Licence for the Assiniboine River will need to be amended if the intake structure is moved or if any other parameters of the existing Water Rights Licence is changed, an application is required for the amendments.

Disposition:

These comments were shared with the proponent with the instruction to follow-up with the Water Use Licensing Section.

Drainage and Water Rights Licensing Branch

- There are no concerns at this time as there appears to be no water control works proposed.
- Please note the project appears to be within the City of Brandon therefore as per Section 5.1 (b) of the Water Rights Regulation 126/87, the proposed water control works fall within a designated urban area, and does not require a Water Rights License to Construct Water Control Works, provided those water control works do not drain class 3, 4 or 5 wetlands, or outlet onto areas outside of the urban area.

Disposition:

These comments were shared with the proponent as additional information.

Water Quality Management Section

It is recommended the proponent be required to conduct a discharge monitoring program at sampling stations effluent, upstream and downstream of discharge in the Assiniboine River of the following parameters:

- Total Chlorine
- Total Suspended Solids
- Total Dissolved Solids
- Turbidity
- Total Ammonia Nitrogen (NH₃-N)
- pH
- Temperature
- Total and dissolved, Magnesium
- Total and dissolved, Calcium
- Hardness
- Total Manganese
- Total Sodium
- Chloride
- Total Iron

The following effluent standards should be in place for Brandon Water Treatment Facility upgrade as per the Manitoba Water Quality Standards, Objectives and Guidelines Regulation (196/2011) for discharge events:

- TSS 25 mg/L
- Chlorine 0.019 mg/L

To further assess the proposed effluent discharge to the Assiniboine River, can the proponent please provide the expected chloride (mg/L), total calcium (mg/L), total magnesium (mg/L), and total sodium (mg/L) concentrations in the effluent stream.

The Water Quality Management Section is concerned with any discharges that have the potential to impact the aquatic environment and/or restrict present and future uses of the water. Therefore, it is recommended that the license require the proponent to actively participate in any future watershed based management study, plan/or nutrient reduction program, approved by the Director.

Disposition:

These comments were shared with the proponent and additional information was requested to address these comments. The draft licence includes a few clauses that addresses the water quality parameters from the effluent stream and the requirements to minimize the future impacts from this development.

Manitoba Sport, Culture, and Heritage, Historic Resources Branch

The project was assessed under Heritage permit A70-22, but there are still outstanding monitoring requirements for when ground disturbing activities start. In addition, there are a couple of revisions that should be addressed in this EAP. Please refer to the public registry for the full details.

- The Manitoba Historic Resources Branch (HRB) has examined the locations in conjunction with Branch records for areas of potential concern. Notably, the identified location is situated along the lower terrace of the Assiniboine River valley. The Assiniboine, and the tributaries that form its watershed, have a number of known archaeological sites along and near the margins, including large Precontact Indigenous campsites, Bison Kill sites, Fur Trade Posts, and Precontact and Historic burial locations. These factors, although not exclusive to the analysis and without the additional requested information, indicate a reason to believe that any future planned ground disturbance, activity, and/or development within the area has the potential to impact heritage resources, therefore, the Historic Resources Branch has concerns.

- Under Section 12(2) of The Heritage Resources Act (the Act), if there is reason to believe that heritage resources or human remains upon or within or beneath lands are likely to be damaged or destroyed by any work, activity, development or project, then the Minister may require a proponent to apply for a heritage permit and conduct at his/her own expense, a Heritage Resource Impact Assessment (HRIA) and mitigation, prior to the project's start.

HRIA Expectations

- An HRIA was conducted by Jacobs Consultancy Canada Inc. for this proposed development under Heritage Permit A70-22. A clearance letter was issued for the report, dated March 3rd, 2023, which outlined that the development may proceed as described, with the provisions that:
 - Heritage Resource Monitoring occurs during ground disturbing activities, and;
 - a Heritage Resource Protection Plan is prepared for this project and submitted to the HRB prior to construction
- The Branch will work with the proponent/land owners and its consultant to draw up terms of reference for this project.

Disposition:

The original comments and resources were shared with the proponent. The draft licence includes a clause that requires the proponent to comply with the requirements of The Heritage Resources Act, and suspend construction and immediately notify the Historic Resources Branch if heritage resources are encountered during the construction of the development.

Manitoba Transportation and Infrastructure, Environmental Services Branch

According to the Brandon and Area Planning District Development Plan By-Law No. 95/01/12, the location of the proposed Water Treatment Facility Upgrades is at flood risk from the Assiniboine River. The area was flooded during the 2014 and 2022 flood events. The flood risk should be taken into consideration when designing the upgrades and moving any vulnerable structures to a location not at risk of flooding should be considered.

Disposition:

These comments were shared with the proponent as additional information.

Manitoba Health – Winnipeg Regional Health Authority

- Of note, the timelines outlined in Table 2-5 “Proposed Schedule for Project Phases” differ from the timelines in the City’s Compliance Plan (the timelines have been extended in the EAP), including the timeline for implementation of corrosion control to address the lead exceedance in the drinking water.
- I recommend the City of Brandon check with the Office of Drinking Water regarding the timeline for implementation of corrosion control and the other timelines outlined in their proposed schedule for project phases.

Disposition:

These comments were shared with the proponent for information.

ADDITIONAL INFORMATION

The branch requested additional information on November 24, 2023, January 30, 2024, December 10, 2024, and April 11, 2025. The proponent submitted responses with additional information on December 4, 2023, April 3, 2024, August 1, 2024, August 9, 2024, October 2, 2024, January 23, 2025, and May 6, 2025. Responses were satisfactory. The department posted the additional information and associated responses on the department's public registry for this development.

PUBLIC HEARING

As no public comments were received, a public hearing is not recommended.

CROWN-INDIGENOUS CONSULTATION

The Government of Manitoba recognizes that it has a duty to consult in a meaningful way with Indigenous communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise of the Indigenous rights of that community.

The Initial Assessment conducted for this project has concluded that the licensing decision does not have the potential to adversely affect the exercise of an Aboriginal or Treaty right. Crown-Indigenous consultation will not be undertaken for Brandon water treatment facility upgrades licensing decision. The project is located on disturbed municipal property and is not expected to generate any negative effects to the local water supply or wildlife. Disruption to fish habitats will be reduced as the project will remove a maintenance activity that is currently impacting the local river.

RECOMMENDATION

Comments received have been addressed through the provision of information and licence conditions. I recommend that the development be licensed under The Environment Act subject to the specifications, limits, terms, and conditions as described on the attached draft Environment Act Licence. I also recommend assigning the administration of the licence to the Western Region of the Environmental Compliance and Enforcement Branch.

Prepared by:

Jay Mak, P. Eng.
Senior Environmental Engineer
Land Use, Waste Management and Energy Section
Environmental Approvals Branch

August 15, 2025

E-mail: Jay.Mak@gov.mb.ca || Telephone: 204-619-0709