SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Neepawa Golf and Country Club Inc.
PROPOSAL NAME: Neepawa Golf and Country Club Inc. Nine

Nine Hole Expansion

CLASS OF DEVELOPMENT: 2

TYPE OF DEVELOPMENT: Recreation CLIENT FILE NO.: 4468.00

OVERVIEW:

The Proposal was dated August 10, 1999 and was received on August 24, 1999. The advertisement of the Proposal read as follows:

"A Proposal filed by Neepawa Golf and Country Club to construct a nine hole expansion to their existing nine hole golf course. The nine hole expansion is located to the east and south of the present facility. A Conceptual Plan for the development has been prepared by Grant Golf on behalf of the Neepawa Golf and Country Club Inc. Construction is scheduled to begin in the Fall of 1999 with opening targeted for the spring of 2001."

The Proposal was advertised in the Neepawa Press during the week of September 6, 1999. Copies of the Proposal were placed in the Main Registry, the Manitoba Eco-Network, the Centennial Public Library, and the Town of Neepawa Municipal Office. It was also distributed to the "Recreation" TAC members for comment. All comments were requested by October 1, 1999.

COMMENTS FROM THE PUBLIC:

No public responses were received.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Manitoba Natural Resources - Recommend that a natural undisturbed buffer a minimum of 10 meters in width be maintained along each bank of the Whitemud River to assist in filtering out residual herbicides/fertilizers used on the golf course. The Whitemud River Conservation District should be consulted /involved in the site selection, design and implementation of any bank stabilization work along this reach of the Whitemud River. Plantings in disturbed areas and along the fairways should be done with native species or their cultivars. The proponent should contact the MNR Water Resources Branch to obtain a Water Rights Act Licence to withdraw water from the Whitemud River for irrigation. Recommend that the proponent consider using wastewater treatment effluent from the lagoon to supplement irrigation water and maintain the river's ability to sustain the existing aquatic diversity and meet surface water quality objectives.

<u>Disposition</u>: In follow-up to DNR's comments, the proponent provided Approvals Branch with a concept drawing of the golf course which identifies areas designated as preserved natural areas, areas proposed for re-establishment of native vegetation and maintained areas within 20 meters of the riverbank. The drawing indicates that the majority of

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riverbank will have a buffer greater than 20 meters with the exception of several areas where a buffer of 10 to 15 meters will be provided. The proponent has had preliminary discussions with local DNR staff concerning the development, and plans to continue to work with the appropriate departments and agencies during the construction phase to identify suitable methods, materials and timing for the restoration work of both the upland and riverbank areas. To accommodate DNR's comments, the Licence will stipulate that in addition to DNR involvement, the proponent will also involve the Whitemud River Conservation District in the site selection, design and implementation of any bank stabilization work and instream enhancement within the development area. In addition, the Licence will stipulate that only native species or their cultivars be used as plantings on disturbed areas with the development site. The Environment Act Licence will require that the proponent obtain a Water Rights Act Licence for any irrigation withdrawals from the Whitemud River. However, the Water Rights Act Licence itself is the appropriate Provincial approval mechanism to ensure that water withdrawals are licenced with appropriate terms and conditions to sustain existing aquatic diversity, water quality and protect downstream users. Should a licenced water withdrawal from the Whitemud River not be sufficient to meet the requirement for the golf course, the proponent would be responsible to examine alternatives to supplement supply such as on-site retention and/or using wastewater treatment lagoon effluent.

<u>Manitoba Rural Development</u> - No land use concerns with regard to the proposed expansion. Suggest that Water Resources determine if the Whitemud River can supply the water for irrigation and that a Water Rights Act licence be required as a condition of approval. Suggest that a buffer area be left along the river to filter any chemical pollutants originating from the golf course.

Disposition: Comments can be accommodated as conditions of the Licence.

<u>Historic Resources</u> - No concerns with regard to the project's potential to impact heritage resources.

Mines Branch - No concerns.

<u>Health</u> - Waste disposal and gasoline should be handled as existing environment regulations. Note that the proponent is investigating the possibility of recycling water from Neepawa's sewage lagoon for irrigation on the golf course. Recommend that the

method irrigation proposed be described in order to quantify risk to the public and golf course workers.

<u>Disposition</u>: Comments regarding regulatory requirements can be accommodated in the Licence. The Town of Neepawa sewage lagoon is operating under Environment Act Licence No. 762 VO. The Town of Neepawa would be responsible to ensure that they apply for an amendment to their lagoon Licence so that appropriate terms and conditions are specified approving the use of the Town's wastewater for golf course irrigation. This requirement can be included as a condition of the golf course Licence.

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<u>Environment (Park-West Region)</u> - Note that the nine hole expansion is proposed in proximity to the Assiniboine Delta Aquifer and along the Whitemud River which has been identified as a groundwater pollution hazard area by Water Resources. Specific concerns which should be addressed in the Environment Act Licence include:

- 1) A sufficient undisturbed buffer area along the Whitemud River should be provided during construction to prevent sediment from entering the river during heavy rainfall events and during spring run-off.
- 2) The development should be given a deadline for seeding to minimize erosion.
- 3) The development should ensure there is a safe storage for herbicide and fertilizer.
- 4) Riverbank stabilization projects should have approval through Manitoba Environment to ensure that impacts to fish during construction are minimal.
- 5) The application rate of herbicides and fertilizers should be identified as a loading rate such as lb/acre or kg/hectare.

<u>Disposition</u>: Items 1 through 4 can be accommodated as conditions of the Licence. With regard to Item 5 golf courses are required to file pre and post seasonal reports on pesticide use through Environment's Pesticide Use Permitting process.

RECOMMENDATION

As no responses were filed by the public in response to the Environment Act advertisement of the Proposal, a public hearing is not recommended. It is recommended that the Proposal be licenced pursuant to the Manitoba Environment Act in accordance with the terms and conditions described in the attached draft Environment Act Licence. It is further recommended that the enforcement of the Licence be assigned to the Park-West Region.

PREPARED BY:

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