

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPOSAL NAME: Riverdale Municipality
PROPOSAL NAME: Riverdale Municipality Water Treatment Plant Upgrade

CLASS OF DEVELOPMENT: One
TYPE OF DEVELOPMENT: Waste Disposal - Water Treatment Plants (Wastewater)

CLIENT FILE NO.: 5771.00

OVERVIEW

The Proposal was received on May 15, 2015. It was dated May 13, 2015. The advertisement of the proposal was as follows:

“A proposal has been received from the Manitoba Water Services Board on behalf of Riverdale Municipality for the upgrading of the Rivers water treatment plant. A new plant would be constructed adjacent to the existing plant. Raw water would continue to be obtained from Lake Wahtopanah. The new plant would use ultrafiltration and reverse osmosis treatment, followed by ultraviolet and chlorine disinfection. This would provide treatment capable of meeting current drinking water standards. Reject water from the treatment system would be discharged to the Little Saskatchewan River through an existing pipeline. The plant would have a treated water capacity of 16.8 litres per second, and would reject 7.2 litres per second back to the river. Construction of the upgraded plant is proposed for the fall of 2015, with completion in 2016.”

The Proposal was advertised in the Rivers Banner on Friday, May 29, 2015 and in the Brandon Sun on Saturday, May 30, 2015. It was placed in the online public registry, the Legislative Library and Millennium Public Library (Winnipeg) public registries. The Proposal was distributed to Technical Advisory Committee (TAC) members on May 28, 2015. The closing date for comments from members of the public and TAC members was June 29, 2015.

COMMENTS FROM THE PUBLIC

Matthew Bauche:

I am emailing my objection to town of Rivers upgrade to water treatment plant. I have no doubts that the town needs an upgrade. My objection is too the size, scope, cost and still using the lake to get our drinking water and the continued use of chlorine. The lake water isn't safe to swim in yet we are expected to drink it? I don't care if reverse osmosis

is used its still unsafe water. I didn't drink chlorine water in a pool yet expected to drink it daily as a resident? We are expected to pay 150-300+ a month just to find this project yet we can't even drink or cook with this water for at least 1.5-2 years. The mayor publicly stated its all a coincidence that this took place when water went bad. The mayor, town and council had this in writing back in 2007 that concerns about the plant and water. 2011 again told immediate action was needed, town, mayor and council wanted to wait for government funding instead of trying to save money. The water has been turbid for basically a year and a half already.

How is it a coincidence if the plant needed repairs/replacing and they weren't done that water was known to be getting worse? If no plant is built and water goes bad there is and can't be a coincidence when no plant had been built. In short this town, mayor and council decided a new hockey and curling rink took precedence over safe drinking water. We are paying over 2 million for 25 years on that now expected to take a huge (300% minimum increase) in water sewer, then to pay back another 2+ million over 20 years. Town also publicly stated that new subdivisions haven't strained or affected water. How could it not place undo stress? You added things to a failing structure. Rivers is at most 1200 residents and 99% are hard working low-mid level income earners. This is adding stress to our life, bottom line, and in the future harder to sell a house. Somebody needs to make a common sense decision and those in charge here have shown common sense isn't common.

Disposition:

Several of these comments concern cost issues that are beyond the scope of the environmental assessment of the project. With respect to environmental and human health issues, the selected treatment process reliably treats surface water sources to meet current drinking water standards. Similar treatment systems have been used successfully in numerous other Manitoba water supply and treatment systems using surface water. Primary disinfection within the water treatment plant will be by ultraviolet radiation; chlorine will be added to the treated water to provide residual disinfection in the distribution system as required by legislation and regulations. This information will be provided to the writer.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE

Manitoba Conservation and Water Stewardship – Lands Branch

No comment.

Manitoba Conservation and Water Stewardship – Parks and Protected Spaces Branch

No comments or concerns to offer as it does not affect any provincial parks, park reserves, ecological reserves, areas of special interest or proposed protected areas.

Manitoba Conservation and Water Stewardship – Wildlife and Fisheries Branch

The Wildlife and Fisheries Branch has reviewed Environment Act Proposal 5771.00 and would like to provide the following comment:

5.6 Species at Risk

“It is proposed that existing infrastructure be used for the discharge line from the new WTP to the Little Saskatchewan River which would eliminate the need for construction and would not disturb the natural habitat of the Barn Swallow. In the event that construction be required regarding the discharge line it will occur outside of the critical nesting period from April to August.”

The Manitoba Conservation Data Centre recommends a restricted activity period of May 15 to September 30 for disturbance near barn swallow nests. The critical nesting period for this species is longer than most other species due to their propensity to produce multiple broods during any given breeding season. **Should** new pipeline construction be required and **if** barn swallows are observed nesting in the area, we recommend that construction not occur within 100 metres of nest sites during this period, as per the CDCs recommended set-back distance for high levels of disturbance. This means that if pipeline construction is to occur, rare and endangered species surveys (including plants) should be conducted prior to its excavation and installation. These surveys should be added as a condition to the licence. The Wildlife and Fisheries Branch can provide recommended restricted activity periods and set-back distances for various rare and endangered bird species upon request.

Disposition:

These comments can be addressed as licence conditions.

Manitoba Conservation and Water Stewardship – Office of Drinking Water

I reviewed the above noted EAP and noted two points:

- The project will require a Permit to Construct or Alter a Public Water System under *The Drinking Water Safety Act*. The proponent should be reminded of this requirement.
- As noted in the EAP, the proposed point of return of the process wastewater is the Little Saskatchewan River, which empties into the Assiniboine River upstream of the City of Brandon WTP raw water intake. As such, the reject from the new rivers WTP will enter the stream into the Brandon WTP. Presumably the degree of dilution in the Little Saskatchewan and Assiniboine Rivers would be enough that the Brandon WTP treatment process will not be affected by the reject from the new Rivers plant, but comment on this issue should have been included in the EAP.
- Further to the above point, a provision should be included in the emergency response plan (ERP) for the new Rivers WTP that contact information for the Brandon WTP be included in the ERP stating that, should a major spill of

chemical from the new Rivers plant occur into the Little Saskatchewan River, the Brandon WTP be contacted immediately.

Apart from these points, Office of Drinking water has no other concerns with this EAP or the proposed development.

Disposition:

These comments were provided to the proponent's consultant for information.

Manitoba Conservation and Water Stewardship – Water Control Works and Drainage Licensing Section

Any water control works (drains, culverts, dykes, dams, etc.) associated with this project will require licensing under the Water Rights Act – an application is attached for the proponent's convenience. Any inquiries in this regard may be directed to the local Water Resource Officer. Their contact information can be found at http://www.gov.mb.ca/conservation/waterstewardship/licensing/pdf/areas_of_focus_jan_23_12.pdf

Disposition:

This information was provided to the proponent's consultant.

Manitoba Infrastructure and Transportation - Highway Planning and Design Branch, Environmental Services Section

MIT has reviewed the proposal under the Environment Act noted above and we offer the following comments:

- Under the Highways Protection Act, any new, modified or relocated access connection onto a Provincial Trunk Highway (PTH) will require a permit from Highway Traffic Board for PTH's. A permit may also be required for:
 - o Any construction (above or below ground level) within 38.1 m (125 ft);
 - o Any plantings within 15.2 m (50 ft) from the edge of the right of way of PTH 25; or
 - o Discharge of water or other liquid materials into the ditch on PTH 25.
- If any new or upgraded pipelines cross along or under PTH 25, an underground utility agreement will be required. An Agreement can be obtained at Manitoba Infrastructure & Transportation Office located in Brandon.

For information on permit applications and utility agreements, please contact Ashley Beck at (204)726-7000 or by email Ashley.Beck@gov.mb.ca.

Disposition:

This information was provided to the proponent's consultant.

Manitoba Municipal Government – Community and Regional Planning Branch

This office has reviewed the EAP for the above referenced project and wish to advise your office that we have no concerns with the proposed development or scope of services. This office does however offer the following comments for your review and consideration:

- **Executive Summary** (Paragraph 2 of page 1) states the existing water treatment plant serves 1189 persons in the community of Rivers while paragraph 2 of Section 1.1 (Background Information – page 3) says the plant serves 514 customers. For clarity, I recommend the reference to “customers” be deleted and be replaced with “dwellings” or households. Absent this change, a reader could assume more than half of the population of the community of Rivers obtain their drinking water from individual wells or by other means (trucked).
- **Population**, Section 1.1 (Table 1.1) on page 5 notes the proposed water treatment plant anticipates serving an additional 298 persons in rural areas of Riverdale Municipality over the next 20 years until 2034. No information is provided concerning the anticipated location this additional rural population. Riverdale Municipality adopted a new Development Plan on December 9, 2014. This new Development Plan provides a significant new area for seasonal recreation development (cottages and or permanent residences) on the west side of Lake Whatopannah. The former development plan had these same lands designated for agricultural development. The point here is that it is not clear whether the population projection used in the EAP factored in this new designated seasonal cottage area.
- **Section 2.0 Description of Proposed Development**, Section 2.1 Project Description (paragraph 1 of page 9) and Section 2.3 Existing and Adjacent Land Use (page 11) and Section 2.4 Land Use Designation and Zoning each contain references to the location of the proposed water treatment plant and adjacent land uses (north and east of the intersection of 1st Avenue and Edward Street). Please be advised the subject lands are designated “**COMMERCIAL AREA** in the Riverdale Development Plan and are zoned “**C3**” - **Highway Commercial Zone** in the Town of Rivers Zoning By-law currently in effect. Section 2.4 (page 11) of the EAP contains no Land Use Designation or Zoning Information. Note here too that according to the Town of Rivers Zoning By-law, “public buildings” are permitted by right in the “C3” Commercial Zone. The minimum site area for “public buildings” in the “C3” zone is 20,000 sq/ft with a minimum site width of 100 feet with buildings to be set back from the front property line by a minimum of 20 feet and 10 feet from side property lines. The proponent is advised to contact the municipality concerning the need to obtain a building/development permit or any other planning approvals that may be required as they relate to the location of development on or below the ground on the subject site (i.e. possible need for variations to deal with any required reliefs from minimum yard setbacks).

- **Section 3.0 Physical Environment**, **Section 3.6 Socioeconomic** (page 15) This section notes 526 dwellings in the community of Rivers in 2011 – This figure differs from the one provided in the **Executive Summary** (see my comments above).

For your information, please find attached (below) a copy of **Riverdale Development Plan Policy Maps 3 and 6** as well as a copy of the **Zoning Map for the Town of Rivers Zoning By-law**. Each map has been “marked up” to show the location of the proposed water treatment plant. (Note: due to the size of the three attached maps, the maps are not included in this project summary.)

Disposition:

This information was provided to the proponent’s consultant. With respect to clarity involving population and customers/dwellings/connections, these terms are commonly used in proposals of this nature. Population is generally based on census information, and customers or dwellings are generally known to the utility operator. Where only one number is known, a general relationship is often used to determine the other number – for example, an assumption of 3 residents per connection. Small differences in population estimates do not affect the accuracy of the report or the sizing of the treatment facility.

ADDITIONAL INFORMATION

No additional information was required to address comments on the proposal.

PUBLIC HEARING

As no public comments were received and no requests for a hearing were filed, a public hearing is not recommended.

CROWN-ABORIGINAL CONSULTATION

The Government of Manitoba recognizes it has a duty to consult in a meaningful way with First Nations, Métis communities and other Aboriginal communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise of a treaty or Aboriginal right of that First Nation, Métis community or other Aboriginal community.

The proposal involves the construction of a new water treatment plant adjacent to the existing plant, with the same water source being used and an improved water treatment process. Since resource use is not affected by the project, it is concluded that Crown-Aboriginal consultation is not required for the project.

RECOMMENDATION

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 Western Regional office of the Environmental Compliance and Enforcement Branch.

PREPARED BY:

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