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July 2, 2013

RM of Ritchot  
352 Main Street  
St. Adolphe, MB  
R5A 1B9

**Re: Red River Pullet Farms Ltd.  
Conditional Use**

Dear Council Members;

In light of the concerns expressed at the Conditional Use Hearing conducted on May 7<sup>th</sup>, 2013, and the exchange of information with council since this hearing, the owners of Red River Pullet Farms Ltd. have decided to re-apply for the conditional use. As part of the application, several amendments have been made to the proposal in order to address the concerns expressed by council and nearby residents in a manner that is still financially viable for the operation. Below is an outline of the measures to be incorporated in the new proposal and the anticipated impacts on the community.

**1) Animal Welfare:**

- a) To address concerns over animal welfare as it relates to confinement cages, it is proposed to construct one of the two barn facilities proposed as an aviary system. This provides the pullets with the opportunity to free range within the barn facility and is not dependant on cages for confinement. The reason both barns are not being configured for the aviary system is that not all of the laying operations that are receiving pullets from the proposed operation are not configured with the aviary system and pullets raised on the aviary system do not adapt well to cages at maturity. In the future, if the demand warrants it, the other barn will be converted to aviary system as well.

**2) Concerns over odour production:**

- a) Unlike other livestock operations in the area which have exposed surface earthen manure storages which are subject to odours being emitted and carried to adjacent neighbours depending on the wind direction, the operation proposed by Red River Pullets Ltd. will produce a solid manure which will be stored long term in a totally enclosed building. Due to the manure collection and ventilation equipment to be incorporated into the production facility, the manure will be handled and stored as a solid. As is common with most pullet operations

handling solid manure, the moisture content of the material will enable the manure to compost and heat, thereby killing off many of the pathogens and bacteria which cause the odours associated with manure.

- b) The absence of any long term manure storage within the barn, such is the case with most hog operations, will eliminate the manure from starting to anaerobically decompose within the barn and prevent the production of offensive odours such as hydrogen sulfide which then become air borne when the manure is transferred from the barn to the long term manure storage. Normal practice within a pullet barn is to remove the manure from the barn to long term storage every 3 to 4 days. This allows sufficient time to have the manure dry down, yet short enough to prevent the manure from beginning to decompose. Within the long term storage building this fresh manure deposited on the pile will continue to dry and encapsulates the pile reducing the odour production.
- c) Location of the proposed facility is such that the minimum separation distances between the nearest residences and residential development as outline in the Development By-Law have been met. Location of the facility is such that prevailing winds from the north, south and west will minimize any associated odour concerns within the nearest developments of St. Adolphe, Ile Des Chenes and Niverville. In all cases, there already exist other livestock operations that would have a significantly higher odour impact due to their earthen manure storages and liquid manure handling practices.
- d) It is proposed to plant a shelter belt around the operation to shield the operation and prevent odours from the operation being readily carried toward adjacent landowners. Rapidly growing species will be incorporated into the shelter belt in order to get this screen established as quickly as possible.

### **3) Water Consumption:**

- a) Concern was expressed over the effects of the operation on the local aquifer. Average daily water consumption by the operation is estimated to be 5200 imperial gallons per day. This is equivalent to the water consumption/waste stream produced by 95 individuals in a domestic application. Although the daily consumption does not warrant a Water Rights License through Manitoba Conservation and Water Stewardship, it is intended to obtain such a license if approved. Through this licensing procedure the effects of the consumption on the localized aquifer are evaluated by the Water Stewardship branch and any concerns are expressed at that time.

### **4) Spreading Land Base for Long Term Sustainability:**

- a) A major portion of the Technical Review conducted by the province on the proposed operation involved the sustainability of the operation with respect to being able to spread the manure produced by the operation in an environmentally sustainable manner such that nutrient accumulations in the soils will not occur and the threat to nutrient runoff into waterways is minimized. For the original proposal sufficient land base was identified to meet the current requirement for 2X the annual phosphorus uptake of the crops to be grown. For this proposal additional land owned by a principle of Red River Pullet Farms Ltd. has been identified for manure application when it becomes available in August 2013 from a manure spreading agreement in place with another livestock operation in the area. By reducing the dependency on land available for spreading by agreement, it can be assured that the operation will have sufficient land base available long term. With this additional land base, there are 1278 available acres, 22 acres short of the requirement for long term sustainability

as determined using the Technical Review acreage calculator. Additional land is available, however was not included due to the absence of available soil nutrient tests. Variations in cropping rotations and the species grown will also have an impact on the required number of acres and can be adjusted to achieve long term sustainability as well, at 1X the annual crop phosphorus uptake.

**5) Cleanliness on Surrounding Road Ways:**

- a) As expressed by local residents, significant concern was expressed regarding the occurrence of mud from fields being tracked onto municipal roads from the Niverville Farms and Puralean sites in the past. Mr. Doerksen would like to reiterate that this was out of his control as he is the barn manager at these facilities only and was responsible for the on-goings in the barn facilities only. Manure management and application were the responsibility Pure Organics who was responsible for the mess that was created. With the new partnership formed with the Ottens, Mr. Doerksen will have control over the manure management and field application of the manure from these facilities and will in all likelihood be performing the field application and will therefore dictate when the manure will be applied so as to avoid this type of situation in the future.
- b) Access to the proposed site in this new proposal has been modified to be from Nanka Road instead of Gauthier Road in order to address concerns expressed by Tri-Venture Farms Ltd. over sharing a common roadway. As all manure hauling will be to the section of land on which the operation is located and to the north of the proposed site, it is not anticipated that the roadway servicing Tri-Venture Farms Ltd. will need to be used for manure hauling. The section of Gauthier Road west of Nanka Road is expected to be un-used by Red River Pullet Farms Ltd. Other than for crop seeding and harvesting operations.

**6) Separation to Tri-Venture Farms:**

- a) By reconfiguring the facility layout to run east-west instead of north-south as originally proposed, it has been possible to increase the separation distance from Tri-Venture Farms Ltd. With the new configuration, the separation distance now becomes approximately a quarter mile, further reducing the already small bio-security impacts that were present in the original application.
- b) As indicated at the original hearing, by situating the facility directly north of Tri-Venture, we are able to minimize the times at which prevailing winds would be directed toward them. By eliminating the shared site access a degree of separation between traffic frequenting each of the facilities will also be afforded.

**7) Discussion with Neighbours:**

- a) At the recommendation of council, those neighbours which attended the original meeting and spoke out toward the proposed project were visited and consulted with to discuss the project and their concerns. The Enn's family and Allan Pauls of Tri-Venture Farms Ltd. were receptive to this interaction and were more receptive to the proposal with the understanding that their concerns would be addressed in a manner which was practical for the operation. The additional odour control measures, re-orientation of the facility layout to increase the separation distances and the new access from Nanka Road to provide isolation for Tri-Venture Farms have addressed many of their concerns. Denise Laurencelle and Earl Wiebe would not acknowledge Mr. Doerksen's attempt to discuss the situation any further by citing that no additional information would change their mind. Letters from the Enn's and Mr. Pauls

acknowledging their more favourable outlook upon the proposed operation since the original hearing are in the process of being obtained by the proponent.

**8) Willingness to Participate:**

- a) The proponent, Red River Pullet Farms Ltd., have expressed a desire and willingness to work with the municipality and council to address the concerns of neighbours and the community as a whole. Within the limits of financial constraints which would otherwise not make the operation viable, the proponent is willing to enter into an agreement with the municipality to either address or find means of resolving those aspects of the proposed operation which council find to be issues hindering the acceptance by the community.

Respectfully Submitted;

South-Man Engineering

Per,



Peter Grieger, P. Eng.

Jacob & Marina Doerksen