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February 23, 2018

**Re: Canada Sheep & Lamb Farms Ltd. (CSL) – Rockwood
Technical Review – Response to Public Comments**

Dear Mr. Malinowski;

In response to concerns expressed by the public we have prepared this letter in consultation with the proponent in order to address the concerns expressed.

Item #1 – Bob and Linda Byle

The support of the community as expressed by Bob and Linda Byle is greatly appreciated. As it is intended to occupy the facility for the foreseeable future all measures possible will be implemented to maintain good environmental standing and sustainability. As with other sites operated by CSL the site will be managed and groomed to maintain a presentable development within the community.

Item #2 – Cheryl Deprez

- **Water quality and waste handling:** Manitoba Sustainable Development has regulations in place to ensure that livestock operations cannot negatively impact water sources be it groundwater or surface water without there being consequences. The animal housing facilities under roof will entirely eliminate direct animal access and exposure of their dunging area to precipitation. The proposal also outlines measures to eliminate the potential for runoff containing nutrients from the outdoor animal containment area from potentially impacting groundwater sources. In order to ensure the environmental protection, the confined livestock area and runoff collection pond are required to be permitted through Sustainable Development (SD) and therefore required to meet the stringent minimum design standards. The presence of a solid manure handling system further reduces this risk as

through the composting process, manure nutrients become more stable and are less likely to be leached from the manure when stored in the field. As the size of the operation is in excess of 300 AU, the operation is also required to file an annual manure management plan which is submitted to SD for review and continual monitoring. Through this means, it is ensured that manure is not over applied and accumulation of manure nutrients are not occurring in the soil, thereby reducing the risk to water quality.

- **Air quality:** Some level of odour is anticipated as with any type of livestock operation be it horses, cows, pigs or sheep. However, as a potential source of odour, sheep would be considered to be one of the least offensive. Management of a sheep herd requires that the bedding and pen areas remain dry in order to maintain animal health and productivity. The straw bedding required to maintain these conditions provide a significant improvement in odour control over liquid manure handling systems such as for dairy and hogs. It is realized that there are a significant number of rural residences in the area, and consideration will be given to individuals in the vicinity of the operation and the land designated for manure application, to minimize the effect on them. Liquid manure undergoes anaerobic decomposition producing high levels of ammonia and potentially H₂S which are responsible for the odour of manure. Composted dry manure as is proposed undergoes aerobic decomposition which eliminates the off gassing of these odour producing components. Previous visitors of other CSL sites have commented at the surprisingly low level of odour witnessed on site. Those interested would be gladly accommodated to tour one of these existing sites in order to witness it for themselves.
- **Storage and handling of waste:** The storage and handling of manure is regulated under the Livestock Manure and Mortalities Management Regulation (LMMMR). This regulation identifies acceptable means for the storage and handling of manure by which all livestock producers must comply. A Manure Management Plan will need to be filed with the province on an annual basis by the proponent. This plan identifies where the manure is to be applied in that particular year and also contains soil test reports on those same parcels of farmland. The intent is to have the manure applied in a sustainable manner in which the nutrients within the manure are utilized by the crop to be grown for either animal feed for the livestock or for sale. The Technical Review document has identified those parcels of land which are currently designated as being committed to the operation for manure application.
- **Property value:** Establishment of livestock operations has been shown to actually increase property values in the immediate area of the operation as the demand for housing increases as employees look to locate close to their place of employment. Land values for farmland also increases due to increased competition for feed sources and the desire to have land situated as close to the operation as possible for economical manure application.

- **Mortalities from the livestock and predators:** The Livestock Manure and Mortalities Management Regulation establishes requirements for the use, management and storage of livestock mortalities in agricultural operations. This helps ensure livestock mortalities are handled in an environmentally sound manner. Predators are a consequence of any type of livestock operation not limited to sheep. Protection and control are the only means of combating this problem. It is proposed to utilize dogs to ward off predators such as coyotes which should also make it more inhospitable for these same predators to remain in the area.
- **Increase in large truck travel:** Hauling of manure and feed will be inevitable and the travel distance will be determined by location. Although closer fields are preferred as the cost of application is lower, fulfilling the requirements with respect to the manure management plan takes precedence. The proponent intends to utilize the least obtrusive travel path so as to create the least nuisance for neighbors and other traffic but also to avoid conflicts that may impede the hauling operation. Precautions will be taken to prevent spillage on the roadway, and immediate cleanup will take place should an incident occur. Similarly, should damage to the roadways occur due to the traffic either during construction or operation, immediate attention to repair of such damage will also be arranged as has been the case at other CSL sites in the past. CSL will assume responsibility for the road maintenance costs during the construction phase so as not to put a burden on local residents nor the municipality. During the construction phase, dust control will likely be provided on those access roads where the impact on neighbouring residents would be excessive.
- **There is already an existing large-scale farm in the area:** Concord Colony has existed at its present location since its inception in 1987. The colony currently has hog, poultry and turkey enterprises on site. Despite its presence, residential development in the area has continued to expand, suggesting that the impacts of this livestock operation are not unbearable or undesirable. The livestock operation proposed by CSL is not considered a threat to the existing operation at the colony as the species of animals are not related. The odour production potential of the sheep operation is also considered significantly smaller than the hog operation which has existed at the colony for many years.
- **Monitoring mechanism put in place by Provincial and Municipal Governments:** The Provincial Government has put in place various monitoring mechanisms to make sure that livestock operations are complying with the requirements. In order to make sure that the quality of water in the area is not compromised, livestock source water quality monitoring reports were required to be submitted to Sustainable Development annually in the past. Although this is no longer required as producer organizations were already requiring this reporting for the purposes of monitoring animal health and welfare, continued testing and monitoring of water quality will be required to ensure and maintain animal health and productivity. In addition, filing of an annual Manure Management Plan and soil testing of the

parcels of land to receive manure will ensure that nutrient accumulations in the soil are monitored and reported to the provincial government. If nutrient concentrations become increasingly higher than target limits for a specific nutrient, the government will intervene and through regulation limit the amount of manure that can be applied to that which will provide for only enough nutrients to support the current crop year, or in extreme situations not allow any manure application at all until the nutrient levels have been drawn down to acceptable limits.

- **Quality of life for the animals:** It is proposed that the animals on site will be given the utmost care and attention. The purpose of this lambing facility is to provide lambing ewes shelter from the environment during lambing along with assistance in lambing should the need arise. Post delivery it is also the staff's responsibility to ensure that the lambs are feeding and properly cared for until such time that they can be weaned from the mother. As this phase of production is critical to the viability of a sheep operation, special attention is provided to ensure animal health and welfare. Stocking density is generally determined by the available feeder space in order to ensure all animals have access to feed and water for welfare purposes. Determination of stocking density on this basis is considered acceptable practice within the sheep industry and has proven to be acceptable for animal welfare. The housing system proposed will also limit opportunities for predators thus making it more hospitable.
- **Notification to residents in neighbouring RMs:** The Rural Municipality and the Technical Review Committee post/publish information about the proposed livestock operation in various media outlets for the purpose of enabling persons and other affected parties to comment on the application. Regulatory requirements are in place to ensure affected persons are notified within a prescribed distance of the operation. Based on the comments received, residents in the RM's of Rosser and West St Paul have been notified of this proposal and have been given similar opportunity to voice their concerns and acceptance of the proposed operation.

Item #3 – Gary and Cathy Goresky- 3-14-2E

The encouragement and acceptance of the proposed operation as expressed by Gary and Cathy Goresky is greatly appreciated. The proposed operation does provide many opportunities for the community that may not exist without the introduction of a livestock industry. As has been highlighted by Gary and Cathy, the community has a lot to benefit from the proposed farm (increased tax revenue for the RM, job opportunities, the potential for local farmers to sell feed in close proximity to where it is produced, a source of lamb for fresh meat and the potential for establishment of a wool industry in Manitoba). As previously mentioned, it is intended to occupy the facility for the foreseeable future and therefore all measures possible will be implemented to maintain good environmental standing and sustainability. As with other

sites operated by CSL the site will be managed and groomed to maintain a presentable development within the community.

Item #4 – Robert and Teresa Makowski

As with the others that have expressed support of the proposed operation, Robert and Teresa's comments are greatly appreciated. The growth of the sheep industry within Manitoba will provide the resources to fulfill a growing market for lamb meat within the region at a more affordable price over product produced in Ontario that needs to be trucked in, or imported product from countries such as New Zealand and Australia, which comes at considerable cost. It is the desire for CSL to have local farms outside of the CSL group to provide the facilities, management and feed sources to raise the lambs produced to market weight. This will provide family farms the opportunity to diversify their operations and develop a new income stream, thus contributing to the health of the provincial economy.

Item #5 – Glen Massey – SW 4-13-3E

Along with those others that have commented in favour of the proposal, the support of the Mr. Massey is greatly appreciated. As a long term resident it is encouraging to hear that as a neighbour he has no complaints with the previous or current operation. Although Mr. Massey's comment with respect to the presence of sheep at the site should have read May 2017, it is CSL's intent to continue to be good neighbours going forward. Along with the others that have commented in favour of the operation, Mr. Massey recognizes the economic benefits that such an operation will bring to the region. As suggested by Mr. Massey, provincial regulations exist to protect the environment, and the scrutiny of all departments within the Technical Review Committee will identify any areas of concern to be brought to the forefront so that they may be addressed before the operation is permitted to expand.

Item #6 – Lawrence Pinsky

The Technical Review Committee Regulation requires a site assessment be undertaken by the proponent to help the committee complete its review and allow the public affected by the livestock operation to comment on the proposal. Most of the issues and concerns (environment and infrastructure) raised by Lawrence Pinsky are addressed in the site assessment.

- **Land value:** As indicated in response for item #2 the establishment of livestock operations has been shown to actually increase property values in the immediate area of the operation as the demand for housing increases as employees look to locate close to their place of employment. Land values for farmland also increases due to increased competition for feed sources and the desire to have land situated as close to the operation as possible for economical manure application.

- **Environment:** The Livestock Manure and Mortalities Management Regulation sets requirements for the use, management and storage of livestock manure and mortalities in agricultural operations, to ensure they are handled in an environmentally sound manner. Submission of the annual manure management plan and permitting of the confined livestock area and associated infrastructure through Sustainable Development are used to ensure environmental sustainability of the proposed livestock operation.
- **Infrastructure:** Refer to Item #2 response – Increase in Large Truck Traffic
- **Contribution to the economy of local community:** Besides its contribution to diversity in the agriculture sector, it is anticipated that the proposed livestock operation will contribute to the local economy through increased tax revenue for the RM, the opportunity for local farmers to sell feed locally instead of having to haul their products to more distant locations, and employment within the facility (11 fulltime and 4 part-time). The increased production of sheep within Manitoba will also enable a reliable supply of sheep meat to be established locally in place of meat that is brought in from Ontario or imported from abroad. This will inevitably result in a more economical meat source for residents of Manitoba, and with sufficient growth will support a slaughter and processing facility as planned in the RM of Stuartburn, which will have additional economic spin-offs.

Item #7 – Lana Lipkowitz

- **Truck traffic:** Refer to Item #2 response – Increase in Large Truck traffic
- **Odour:** Refer to Item #2 response – Air Quality
- **Increased water consumption:** Due to water quality issues associated with TCE (trichloroethylene) in the area of the proposed development, Well water is not permitted to be utilized by the proposed operation. In the event that well water is permitted to be used in the future, a Water Rights Licence for the operation would be required as the daily consumption is projected to be in excess of the threshold limit of 5500 gallons/day. Administered through the Provincial Government, this licensing process is a means of ensuring sustainable quantities of water are available for all users.

As well water is not a viable source of water supply at the proposed site it will be required to have the water supplied through the municipal pipeline system. Although it is anticipated that the peak consumption will be only 16000 imp gal/day based on historical

data collected from a similar type of operation, the more conservative value of 34,642 imp gallons/day as outlined by the province has been utilized to verify that sufficient water supply is available for all user's connected to the pipeline. In response to CSL's request for verification of water supply, the RM of Rockwood acknowledged that they are capable of supplying the volume as requested on a daily basis.

It should be noted that the large difference between the anticipated usage versus the theoretical usage as suggested by the province is due in large part that the provincial values reflect consumption based on a dry feed diet (15-20%). CSL intends to feed silage at 60-70% moisture, thus reducing the amount of water that the animals need to consume.

- **Environmental Impact:** The Livestock Manure and Mortalities Management Regulation prescribes the requirements for the use, management and storage of livestock manure in agricultural operations to ensure it is handled and utilized in an environmentally sound manner. Submission of the annual manure management plan and permitting of the confined livestock area through Manitoba Sustainable Development are mechanisms in place to monitor and ensure environmental compliance during the development and operation stages.
- **Property value:** Refer to Item #2 response – Property Value
- **Soil Contamination:** The Provincial Government has put in place various monitoring mechanisms to make sure that livestock operations are complying with the requirements. Through the Manure Management Plan which is required to be submitted annually and soil testing of the parcels of land to which manure is to be applied, nutrient accumulations in the soil are monitored and reported to the provincial government. If nutrient concentrations become increasingly higher than target limits for a specific nutrient, the government will intervene and through regulation limit the amount of manure that can be applied to that which will provide for only enough nutrients to support the current crop year, or in extreme situations not allow any manure application at all until the nutrient levels have been drawn down to acceptable limits.

Through the permitting process for the confined livestock operation and runoff collection pond, the construction practices and design aspects are reviewed by Sustainable Development to ensure that the objectives of protecting the environment are achieved. Regular inspections of the facilities by Sustainable Development staff also ensure that the infrastructure is maintained such that this protection is preserved.

- **Monitoring of the livestock operation:** Manitoba Sustainable Development has regulations in place to ensure that livestock operations cannot negatively impact water sources be it groundwater or surface water without there being consequences. Through the Manure Management plan and soil testing of the parcels of land, nutrient accumulations in the soil are monitored and reported to the provincial government on an annual basis.

There also exists the Manitoba Farm Industry Board and the Farm Practices Protection Act which are a mechanism by which concerned individuals can question the practices of a farm operator with regards to concerns over odour production, manure application techniques, animal production etc. With this system in place there is the opportunity to have any concerns addressed in a timely fashion.

- **Animal welfare:** The proposal put forth by CSL incorporates measures that are most favourable for animal welfare. These are the next generation of breeding animals responsible for the reproduction necessary to produce the market lambs which will end up on the dinner table. Neglecting the welfare of these animals will directly impact the profitability, thus is not in the best interest of the proponent to neglect or mistreat their livestock. These same measures intended to provide animal welfare will also serve to improve the environmental protection and sustainability of the operation.

Item #8 – Colin & Michelle Merritt – 935 Blackdale Road

- **Odour:** Inevitably some level of odour can be expected with any type of livestock operation be it horses, cows, pigs or sheep. Sheep, however, as a potential source of odour, are considered to be one of the least offensive. The most significant odours from the operation would occur when manure is removed from the outdoor confinement facilities which is accomplished once per year or the barn facilities which are cleaned 3 times per year. In all instances the maximum period to accomplish the cleanout would be 2 days during which time the manure and bedding material is transported to the associated spreading field intended to receive the manure the following growing season. Contents of the runoff collection pond consisting of primarily precipitation runoff which has come in contact with the confinement area is directly field applied to growing crops during the growing season on an as needed basis in order to maintain the storage capacity for the next runoff event. As the prerequisite for successful sheep production is to maintain a dry bedding area, the moisture content of the bedding removed from the confinement areas tends to be relatively low and in most instances has not undergone the anaerobic decomposition process which is responsible for the significant portion of the odours associated with manure.

It is estimated that your location is approximately 3.0 km south of the proposed site as measured from aerial photographs. With the presence of existing dairy and beef cattle operations in closer proximity to your site, any odours produced by the proposed operation on a daily basis would be indiscernible. The frequency of winds from the direct north during the summer months when the intensity of any odours would be expected to be most prevalent is also very uncommon, lending itself to minimal impact to your site. It is suggested that those individuals concerned about odour accept the invitation to tour an existing facility in order to assess for themselves the level of odour to be anticipated.

Item #9 – Gerald Tycholis and family – 2048 Rushman Road

- **Environmental and health risks to residents in the area:** Claiming that farmers are allowed to do what they want could not be any further from the truth. Livestock production operations in Manitoba, particularly beyond the 300 AU threshold, are highly regulated and monitored by provincial regulation with regards to environmental protection, more so than any of the other western provinces. Animal manure and mortalities will be managed based on the existing provincial regulations and must prove that these criteria can be met sustainably before being allowed to construct. This requires that the manure be collected, stored and applied to cropland in an environmentally sustainable manner that will protect the environment and be sustainable in the long term. Measures will be undertaken in conformance to provincial regulation to have the necessary safeguards in place throughout the entire development of the proposed site. It is therefore not anticipated that the proposed livestock operation will contribute to environmental contamination as suggested, but instead provide a “green” alternative to commercial fertilizers that are currently being used to fertilize the manure application fields identified.
- **Contribution to Economy:** As previously indicated, in addition to the proposed operation’s contribution to diversity in the agriculture sector, it is anticipated that the proposed livestock operation will also contribute to the local economy through increased tax revenue for the RM based on the assessed value of the infrastructure which is anticipated to be the equivalent of 10-15 residences. Note too that the costs to the RM to service a single operation such as proposed is considerably less than the 10-15 residences required to be equivalent in assessment value. The proposed operation also provides the opportunity for local farmers to sell feed locally instead of having to haul their products to more distant locations thereby increasing their profitability. The new operation will generate employment within the facility (11 fulltime and 4 part-time), and with growth in the sheep industry the potential for establishment of a slaughter plant and its economic spin-offs would also be a possibility. The increased production of sheep within Manitoba will also enable a reliable supply of sheep meat to be established

locally in place of meat that is brought in from Ontario or imported from abroad. This will inevitable result in a more economical meat source for residents of Manitoba.

- **Manure Application and Groundwater Safety:** Setback distances and buffer zones are determined and enforced by the provincial government and are based on the type of manure being applied (liquid versus solid), the method of application and time of year. The proponent intends to comply with these minimum setbacks in order to maximize environmental protection and avoid conflicts with adjacent land owners. During manure application consideration will be given for wind direction so as to lessen the impact on the adjacent landowners. Composted solid manure which is intended to be broadcast and incorporated into the soil within 48 hours of application is considered to be low risk in regards to nutrient losses and mobility. Applied in accordance with a prescribed manure management plan, the risks associated with manure application are no greater than with comparable amounts of commercial fertilizer. The introduction of organic material into the soil structure in fact will improve the condition of the soil, thereby increasing its productivity and lessening the likelihood of nutrient losses.
- **Increased heavy traffic to the area (dust and unsafe conditions):** Hauling of manure and feed will be inevitable and the travel distance will be determined by location. Although closer fields are preferred as the cost of application is lower, fulfilling the requirements with respect to the manure management plan takes precedence. The proponent intends to utilize the least obtrusive travel path so as to create the least nuisance to the neighbors and other traffic but also to avoid conflicts that may impede the hauling operation. Precautions will be taken to prevent spillage on the roadway, and immediate cleanup will take place should and incident occur. Similarly, should damage to the roadways occur due to the traffic either during construction or operation, immediate attention to repair of such damage will also be arranged as illustrated in the past. CSL will assume responsibility for the road maintenance costs during the construction phase so as not to put a burden on local residents nor the municipality. During the construction phase, dust control will likely be provided on those access roads where the impact on neighbouring residents would be excessive. Regarding safety of families and their children, road safety is the responsibility of all users and operators of motor vehicles. As in any situation caution will be exercised to protect the safety of all residents as it is anticipated that employees and the site manager will also have children playing within these same areas.

Item #10 – RM of West St Paul and Red River Planning District Staff

- **Proximity of the livestock operation to a designated rural residential area:** Applications for Conditional Use and Variation Orders have been submitted to the South Interlake Planning District. It is our belief that the planning district will contact the RM of West St Paul to facilitate the variation order.
- **Noise, dust, odour and increased traffic nuisances:** The level of noise anticipated from the operation is not expected to be any different than any other farming operation in the area. Equipment used for field work is typical of many of the operations in the area and the animals remain relatively subdued as feed is available all the time. During the construction phase, dust control will likely be provided by CSL on those access roads where the impact on neighbouring residents would be excessive. As a potential source of odour, sheep would be considered to be one of the least offensive species of livestock as the housing facilities and manure are considered to be dry, versus the liquid manure handling systems of other species. Moreover, the management of a sheep herd as indicated under Item #2 – Air Quality has proven to minimize odour production from sheep operations. The proponent intends to utilize the least obtrusive travel path so as to create the least nuisance to the neighbors and other traffic but also to avoid conflicts that may impede the proponent from carrying out necessary operations.
- **Significant repair and maintenance costs on roads:** It can be anticipated that as traffic use increases on a roadway that the potential for deterioration also increases and under unfavourable weather conditions this rate of deterioration increases with additional traffic. However, effective operation of the proposed facility requires the ability to access the site during all weather conditions in order to move feed and animals on and off site. For this reason, the proponent will make it their priority to arrange for the roadways to be maintained and cleared, and contribute to this effort when required such that they remain passable by all users.
- **Property values of nearby residential homes:** Establishment of livestock operations has been shown to actually increase property values in the immediate area of the operation as the demand for housing increases as employees look to locate close to their place of employment. Land values for farmland also increases due to increased competition for feed sources and the desire to have land situated as close to the operation as possible for economical manure application and feed production.
- **Surface water pollution:** Manitoba Sustainable Development has regulations in place to ensure that livestock operations cannot negatively impact water sources be it

groundwater or surface water without there being consequences. It is the duty of the operator to ensure all manure is contained on the property and not allowed to escape which is continually under the scrutiny of Sustainable Development.

- **Impacts of runoff containing E. coli and other nutrients on watershed draining to Red River:** The animal housing system proposed entirely eliminates direct animal access to surface water and incorporates a runoff collection pond to intercept any runoff from the confinement area before it can reach a surface water course. The runoff is retained in the collection pond until such time that it can be applied to crop land at agronomic rates. The utilization of a predominantly solid manure handling system further reduces this risk as through the composting process, manure nutrients become more stable and are less likely to be leached from the manure when stored and applied in the field.
- **Groundwater contamination from onsite manure storage and burial of animals:** As indicated in the preceding response, the presence of a solid manure handling system reduces the risk of groundwater pollution as through the composting process, manure nutrients become more stable and are less likely to be leached from the manure when stored in the field. Due to the size of the operation in excess of 300 AU, the operation is also required to file an annual manure management plan which is submitted to Sustainable Development for review and continual monitoring. Through this means, it is ensured that manure is not over applied and accumulation of manure nutrients are not occurring in the soil, thereby reducing the risk to water quality even further.

It is not intended to bury dead animals on site. Mortalities are intended to be composted and upon completion of the composting process the resulting product will be field applied along with the manure at agronomic rates. In the event that there is a catastrophe where there is mass mortality, bury may be considered as an option, but only undertaken at the instruction of Sustainable Development.

Construction of the runoff collection pond will be such that the requirements of the Livestock Manure and Mortalities Management Regulation are fulfilled. Through this process the acceptability of soil and groundwater conditions will be evaluated and appropriate design features incorporated to maintain the intent and goals of the LMMMR.

- **Manure spread fields in close proximity of residential homes (odor):** Setback distances and buffer zones are determined and enforced by the provincial government and are based on the type of manure being applied (liquid versus solid), the method of application and time of year. The proponent intends to comply with these minimum

setbacks in order to maximize environmental protection and avoid conflicts with adjacent land owners. During manure applications, consideration will be given for wind direction so as to lessen the impact on the adjacent landowners. The composted solid manure intended to be spread is also significantly less pungent than liquid manure which has undergone anaerobic decomposition and is high in ammonia and hydrogen sulfide which are the contributors to the odour experienced.

As a livestock operation has existed at the proposed development site since 1975, it is apparent that the RM of West St. Paul has not taken this into consideration in the approval of subsequent sub-divisions since 1991. A portion of the sub-division approved on Rushman Road in 1991 (2314 and 2320 Rushman Road) required that the landowner enter into an agreement to include a caveat on the properties advising that there existed a large livestock operation in the area. By way of this caveat any potential purchaser would be made aware of this operation and be allowed to decide if the “rural” living was the choice for them. Following this time no such caveat was placed on subsequent sub-divisions even though there was knowledge by the local government that livestock operations existed nearby.

- **Impacts on water and soil capacity:** The Provincial Government has put in place various monitoring mechanisms to make sure that livestock operations are complying with the requirements. In order to make sure that the quality of water in the area is not compromised, livestock source water quality monitoring reports were required to be submitted to Sustainable Development annually in the past. Although this is no longer required as producer organizations were already requiring this reporting for the purposes of monitoring animal health and welfare, continued testing and monitoring of water quality will be performed. In addition, filing of an annual Manure Management Plan and soil testing of the parcels of land to receive manure will ensure that nutrient accumulations in the soil are monitored and reported to the provincial government. If nutrient concentrations become increasingly high and reach threshold limits for a specific nutrient, the government will intervene and through regulation limit the amount of manure that can be applied to limit the nutrient addition to that which is required to support the current crop year, or in extreme situations not allow any manure application at all until the nutrient levels have been drawn down to within acceptable limits. Based on their experience on other sites, CSL is confident that the land base identified is sufficient to be sustainable long term.
- **Traffic – trucking route for the livestock:** It can be anticipated that as traffic use increases on a roadway that the potential for deterioration also increases and under unfavourable weather conditions this rate of deterioration increases with additional traffic. However, effective operation of the proposed facility requires the ability to access the site during all weather conditions in order to move feed and animals on and off site.

For this reason, the proponent will make it their priority to arrange for the roadways to be maintained and cleared, and contribute to this effort when required such that they remain passable by all users. PR 220 north to Hwy #67 and Rushman Road west to Hwy #7 will be the preferred routes for most traffic so as to avoid more concentrated residential areas to the east and south.

- **Impact on water supply for local residents:** Refer to response Item #7 – Increased Water Consumption

Item #11 – Len and Janet Dacombe - 2310 Rushman Road

- **Impact on Fresh Water Aquifer:** Manitoba Sustainable Development has regulations in place to ensure that livestock operations cannot negatively impact water sources be it groundwater or surface water without there being consequences. It is the duty of the operator to ensure all manure is contained on the property and not allowed to escape. The presence of a solid manure handling system reduces the risk of groundwater pollution as through the composting process, manure nutrients become more stable and are less likely to be leached from the manure when stored in the field. Due to the size of the operation in excess of 300 AU, the operation is also required to file an annual manure management plan which is submitted to Sustainable Development for review and continual monitoring. Through this means, it is ensured that manure is not over applied and accumulation of manure nutrients are not occurring in the soil which would otherwise lead to increased risk to water quality.
- **Odour and its impact on Property Value:** Composted manure tends to be relatively inert with respect to odour during the field application process. The intent is to incorporate the manure within 48 hours of application to further minimize any odour production. Occasional odours can be expected as the manure from the operation is removed and stockpiled in the respective spread fields. Note that not all spread fields identified in the site assessment will be utilized simultaneously in the same year. It is proposed to use these fields in rotation with possibly 3 years passing being between manure applications on a specific field. The likelihood of being surrounded by manure application fields in the same year is therefore very remote.

Experience within the southeast portion of the province where livestock production is considerably more dense, is that land values actually rise as a consequence of establishment of a substantial livestock operation as employees look to locate closer to their place of employment and competition for farmland for feed production and manure spreading increases.

- **RM of West St Paul not contacted or not made aware of the proposed expansion:** Based on the customary practice, applications for Conditional Use Order and Variation Order have been submitted to the South Interlake Planning District. It is our belief that the planning district has contacted the RM of West St Paul in this respect. The Technical Review Committee also has published the announcement in the local newspapers advising of the proposal and the location where information on the proposal can be attained.
- **Setback Variance:** Decision on the Variance approval is at the discretion of the RM of Rockwood for those areas within the municipality. Beyond the boundaries of the municipality setback variances would not be applicable. In 1991 portions of the approved sub-division in question were on the basis that a caveat be placed on the property to advise that a large livestock operation existed in close proximity. It was then at the discretion of the purchaser as to whether to purchase the property or not. Since that time the RM of West St. Paul has not required this caveat for subsequent sub-divisions and therefore unsuspecting purchasers may not be aware that a livestock operation exists in the area.

Item #12 – Ron and Lorraine Dacombe – 2286 Rushman Road

- **Impact on Groundwater Aquifer:** Refer to response Item #11 Impact of Fresh Water Aquifer. On occasion land being operated by Kelroe Farms has received manure from their dairy operation as a course of crop rotation in lieu of commercial fertilizers. As with any other livestock operation the preference is to apply manure as close to the operation as possible to reduce costs and increase convenience. Subsequently, Kelroe Farms has retained sufficient land base in close proximity to their operation to sustain their manure application needs and have made available surplus lands to CSL for manure application.
- **Number of Residences within 3 km Setback:** The intent of the site plan is to identify residential developments and other notable features within the setback distance. The Technical Review Committee and South Interlake Planning District undertake to identify all individual landowners within the 3.0 km setback distance in order to provide the appropriate notification. To our knowledge all land owners within the setback distance irrespective of the fact of whether there is a residence on the property or not, have been given notification and the opportunity to comment on the proposal.
- **Odour due to prevailing north-westerly wind:** Prevailing winds on an annual basis in the area are from the north-northwest and west-northwest and south-southeast to south-

southwest Historical data indicates that winds from the northwest will be experienced predominantly during the fall and winter months while winds from the south will be more prevalent during the spring and summer months. During the winter months, what odours that may be present during the summer months are even further diminished as dung within the confined livestock area is immediately frozen and no surface moisture exists to generate and support odour production. During the winter months when winds from the northwest are most likely, the only source of odour would be cleanout of the barn facilities and transport of the manure to field storage. This process takes approximately 2 days during which time only minor inconveniences would be anticipated and only for a short period of time.

- **Setback Variance:** Decision on the Variance approval is at the discretion of the RM of Rockwood for setbacks within the Municipality of Rockwood only. Beyond the boundaries of the municipality setback variances would not be applicable. In 1991 portions of the approved sub-division in West St. Paul along Rushman Road were approved by the council at that time on the basis that a caveat be placed on the property to advise that a large livestock operation existed in close proximity. It was then at the discretion of the purchaser as to whether to purchase the property or not. All subsequent sub-divisions in this area of West St. Paul were not required to have this caveat applied although it was known fact that large livestock operations do exist in the area.
- **Relocation of Proposed Development Site:** Establishment of a new site when an existing livestock operation is already available seems to be an unreasonable request. Infrastructure that can be utilized already exists and a willing landowner prepared to sell the property exists, where one does not exist within the zone suggested. Manitoba Sustainable Development has regulations in place to ensure that livestock operations cannot negatively impact water sources, be it groundwater or surface water, without there being consequences. It is the duty and desire of CSL to ensure all manure is properly handled and responsibly managed to ensure contamination does not occur.

Item #13 – David and Amanda Dacombe – 2364 Rushman Road

- **Impact on fresh water:** Refer to response Item # 11 – Impact on Fresh Water Aquifer
- **Odour from the proposed livestock operation and its impact on property value:** Refer to response Item #11 – Odour and Its Impact on Property Value

Item #14 – C. and W. Maxwell

- **Impact of proposed water use on residential water supply:** Refer to response Item #7 – Increased Water Consumption
- **Accurate Number of Residences:** Refer to response Item #12 – Number of Residences within 3 km Setback
- **Noise, odour and pollution from the proposed livestock:** Refer to response Item #10 - Noise, dust, odour and increased traffic nuisances
- **Property and land values:** Refer to response Item #10 – Property values of nearby residential homes
- **Proposed operation too close to residential houses:** Setback distances and buffer zones are determined and enforced by the provincial and municipal governments and are based on such factors as operation type and size, the type of manure handling system (liquid versus solid), and the method of application. The current operation has existed for 43 years, during which time much of the residential development in the area has occurred with the knowledge that livestock operations existed within the region. As residential development has been allowed to expand with this knowledge why too should agriculture not be allowed to expand as well. The proponent has applied for a Variance to vary the minimum separation distance to a residential development which is at the discretion of the municipal council to approve or deny.
- **Yard Lighting:** As with any development, yard lighting will be necessary for security and to allow certain tasks to be carried out when natural lighting does not exist. Consideration to the direction of the yard lighting can be provided to ensure disruption to adjacent properties is minimized.
- **Increase in predators (coyotes):** Predators are a consequence of any type of livestock operation not limited to sheep. Protection and control are the only means of combating this problem. Due to their vulnerability sheep require additional protection particularly when outdoors. This protection will be afforded through confined guard dogs and wire mesh fencing around the developed area.

Item #15 – Laurie Ellwood and Joel Gillespie – 2314 Rushman Road

- **Impact on fresh water:** Refer to response Item #11 – Impact on Fresh Water Aquifer
- **Odour from proposed sheep and lamb operation/spreading of manure:** Refer to response Item #11 – Odour and Its Impact on Property Value
- **Impact of odour and contamination of water:** Due to the prevalent clay soils in the region of the development and spreading fields it is highly improbable that contamination of groundwater would occur. In addition to the safe guards built into the design of the confined livestock area, the Provincial Regulations in place provide continual monitoring and inspection to ensure that the operation is being maintained and operated in an environmentally responsible and sustainable manner.

The production of odours has previously been discussed in other responses, however we should note that a caveat was issued against this property as a condition of the approval by the RM of West St. Paul when it was originally sub-divided for residential development in 1991. The caveat reads as follows, “ By virtue of a condition of the approval of subdivision herein that a Caveat be filed against the subject property so that future prospective purchasers be advised that there exists full scale agricultural activities in the area.” With this knowledge at the time of purchase, the property owner’s chose to accept the possibility that the farming activities in the area may at times impact them. It is CSL’s intent to minimize these impacts, however it is impractical to expect that impacts such as noise or odour will be totally eliminated.

Item #16 – Kendal Roehle, Kelroe Farms

The support of the community as expressed by Kendall Roehle from Kelroe Farms is greatly appreciated. As a dairy farmer in the area Mr. Roehle has an appreciation for the importance of agriculture in the area and the opportunities that the proposed operation presents for local farmers. Mr. Roehle has graciously committed a portion of his land base to receive manure from the proposed operation as he has experienced firsthand the benefits of organic fertilizer over commercial fertilizers. He also views this as an opportunity to locally market any of his surplus feed which would otherwise have to be transported considerable distance to viable markets. By minimizing transportation costs and the time associated with its transport it is likely that the profitability and efficiency will increase.

Item #17 – Christine Skakun – 2186 Rushman Road

- **Why was I not directly notified?** The Regulation requires that the only notification required is the posting of a notice in the local paper that a proposal has been received and that it can be viewed and commented on. In this case ads were published in the Stonewall Argus Teulon Times & the Stonewall Teulon Tribune. On a pilot project basis between the province and the municipality, mailing of the newspaper ad to landowners with a 3 km radius of the project site is done as a courtesy. In addition to these avenues, the municipality is also required by legislation to notify all landowners within this 3 km radius of the Conditional Use Hearing to ensure that anyone missing notification via media advertising have at minimum been given direct notification of the Hearing.
- **Variance 2/3rds of Required Setback:** The current livestock operation has existed and been in operation since 1975. During this time residential development has continued to expand with the knowledge that this operation existed. One would surmise that the governing bodies at the time would have taken into consideration when approving residential sub-divisions in close proximity to livestock operations that at some time the agricultural operation may also want to progress and expand their capacity to be more competitive and viable. Residents within these sub-divisions would also have been aware that agricultural activities were taking place in the region and that some impacts would be anticipated.

The RM of Rockwood does not have the authority to require a variance for separation distances to residences or designated areas outside of the municipality. It would be the responsibility of the RM of West St. Paul to limit subdivision development given the knowledge that large livestock operation have pre-existed in close proximity. CSL has committed to minimizing the impacts on neighbouring properties by incorporating all measures and management practices that are reasonably feasible.

- **Potential for Air, Water and Soil Contamination:** These items have been discussed in detail in previous responses. Please refer to these comments for further information, Item #10.
- **Noise:** The level of noise anticipated from the operation is not expected to be any different than any other farming operation in the area. Equipment used for field work is typical of many of the operations in the area and the animals remain relatively subdued as feed is available all of the time.

- **Increased traffic flow down the gravel road – will the gravel be replaced more often:** It can be anticipated that as traffic use increases on a roadway that the potential for deterioration also increases and under unfavourable weather conditions this rate of deterioration increases with additional traffic. However, effective operation of the proposed facility requires the ability to access the site during all weather conditions in order to move feed and animals on and off site. For this reason, the proponent will make it their priority to arrange for the roadways to be maintained and cleared, and contribute to this effort when required such that they remain passable by all users.

Item #18 – Brad Schilke – 2214 Rushman Road

- **Potential to create pressure on residential water supply:** Refer to response Item #7 – Increased Water Consumption
- **Depreciation of property value as a result of odour and noise:** Refer to response Item #11 – Odour and Its Impact on Property Value
- **Spread field which has been used by an existing dairy operation:** On occasion land being operated by Kelroe Farms has received manure from their dairy operation as a course of crop rotation in lieu of commercial fertilizers. As with any other livestock operation the preference is to apply manure as close to the operation as possible to reduce costs and increase convenience. Subsequently, Kelroe Farms has retained sufficient land base in close proximity to their operation to sustain their manure application needs and have made available surplus lands to CSL for manure application.
- **Inaccurate list of residential properties within the 3km radius:** Refer to response Item #12 - Number of Residences within 3 km Setback

Item #19 – John Douglas – 2206 Rushman Road

- **Potential contamination of well water and pressure on residential water supply:** Refer to response Item #11 Impact of Fresh Water Aquifer. The cost of this municipal water supply based on the projected use from existing operations has been used in the business plan to establish the viability of the operation. Due to the threat of TCE contamination there is no desire by CSL to utilize a water source that will impact the health and marketability of its product. It is therefore not anticipated that well water without assurance from government departments that the threat has been eliminated.

- **Depreciation of property value as a result of odour and noise:** Refer to response Item #11 – Odour and Its Impact on Property Value
- **Spread field which has been used by an existing dairy operation:** Refer to response Item #18 - Spread field which has been used by an existing dairy operation
- **Inaccurate list of residential properties within the 3km radius:** Refer to response Item #12 - Number of Residences within 3 km Setback and Item #17 - Why was I not directly notified?

Item #20 – Todd Douglas – 2194 Rushman Road

- **Potential to create pressure on residential water supply:** Refer to response Item #19 – Potential contamination of well water and pressure on residential water supply
- **Affect of Operation on Property Values as a result of Odour and Noise:** Refer to response Item #11 – Odour and Its Impact on Property Value
- **Lands List for Manure Application:** Refer to response Item #18 - Spread field which has been used by an existing dairy operation
- **Inaccurate list of residential properties within the 3km radius:** Refer to response Item #12 - Number of Residences within 3 km Setback

Closing:

The proponent would like to thank those who took the time to express their concerns and give us the opportunity to provide additional insight into the type of operation which is expected to be established. Numerous other sites have been developed within the province and have co-existed with the community in harmony. An invitation is extended to anyone who is interested in touring one of these operations to get a better understanding of the full scope of such an operation and the day-to-day workings and impacts on its' surroundings. The proponent intends to operate and manage the facility in a professional and responsible manner protecting both the environment and respecting adjacent land owners and the nearby community. As it is expected that at least a portion of the employees of the operation will also be neighbours to the operation the desire is to have as little impact on the region as possible.

As a means to combat concerns over noise and odour it is proposed to establish a shelterbelt around the development area to act as a buffer and shield the development from wind which would potentially convey odours to adjacent properties. This shelter belt would also act as a visual screen to shield neighbours from the activity and lights required to deter predators and allow operation of the facility beyond daylight hours.

Compliance with all municipal and provincial regulations is an important aspect of the operations to be carried out by CSL. The establishment of its head quarters at this location is a long term commitment to the community and the desire to be an accepted part of the community is paramount. As previously indicated, CSL will strive to implement all practical production and management practice to ensure neighbours and nearby communities are impacted as little as possible.