



TECHNICAL REVIEW COMMITTEE

**A TECHNICAL REVIEW REPORT
PREPARED FOR**

**THE RURAL MUNICIPALITY
OF
ROCKWOOD**

**CANADA SHEEP AND LAMB -
ROCKWOOD**

SE¹/₄ 5-13-3 EPM

TRC 12 – 033

February 26, 2018

A. INTRODUCTION – THE TEAM

The Technical Review Committee (TRC) is supported by the following department personnel:

- Agriculture (Ag); Livestock Environment, Nutrient Management and Business Development Specialists, Agricultural Engineer, and Veterinarians
- Municipal Relations (IMR); Community Planners
- Infrastructure (MI); Development Review Technologists, Engineering and Operations Division; Development Review Officers, Water Management and Structures Division
- Sustainable Development (SD); Technical Review Officer, Soils Specialist, Environmental Engineer, Environment Officer, Habitat Mitigation Biologist, Regional Wildlife Manager, Nutrient Management Regulation Supervisor, Groundwater Specialist, Water Rights Licensing Manager and Resource Planner
and
- Any other specialist or department that may have an interest, which may be consulted during the process.

The Technical Review Coordinator, (Senior Planner, IMR) chairs the committee.

THE REPORT (TRC Process Box 17)

Prime Purpose of TRC Reports

To provide objective, highly credible, technically-based assessments that:

- a) Enable municipal councils to make informed Conditional Use Permit decisions;
- b) Create a common stakeholder understanding of a livestock proposal, potential impacts and related regulatory requirements and safeguards;

- c) Provide a vehicle/forum that enables the sharing of public concerns and proponent responses;
- d) Offer recommendations to both municipal councils and proponents; and
- e) Represents the fulfillment of the TRC's role as per 116(1)(b)(i) of The Planning Act – to determine, based on available information, that the proposed operation will not create a risk to health, safety or the environment, or that any risk can be minimized through the use of appropriate practices, measures and safeguards

Should the Municipal Council provide conditional approval of the proposal, the project proponent may be required to obtain various permits and licenses from the Province to address in greater detail environmental aspects of the proposal.

THE PROCESS

- TRC Process Chart with actual pertinent dates and brief overview

The Technical Review Process: TRC-12-033 – Canada Sheep and Lamb -Rockwood



B. DESCRIPTION OF PROPOSED LIVESTOCK OPERATION

To view a detailed description, go to

www.gov.mb.ca/ia/programs/livestock/public_registries.html

Applicant: Canada Sheep and Lamb – Rockwood

Site Location: Approximately 2.9 miles (4.66 km) south east of the of the community of Stony Mountain in the RM of Rockwood at the intersection of PR 321 and PR 220 adjacent to the SE municipal boundary at SE 5-13-3 EPM. Please refer to maps below.

Proposal: To expand a sheep production operation from 2000 replacement ewes to 8,000 lambing ewes, with lambs removed after 10 weeks. This will involve the addition of 8000 Ewes, 100 Rams and 4558 Lambs (a change from 182 Animal Units to 1,333 AU) within an animal confinement facility/confined livestock area. The site was previously occupied as a turkey operation with sheep being moved on site in May 2017.

Note: The Conditional Use Permit Application and Application for Variations submitted to the South Interlake Planning District Office indicate that Canada Sheep and Lamb is planning to establish its corporate headquarters at this site with additional office space to be constructed to facilitate administration and production staff.

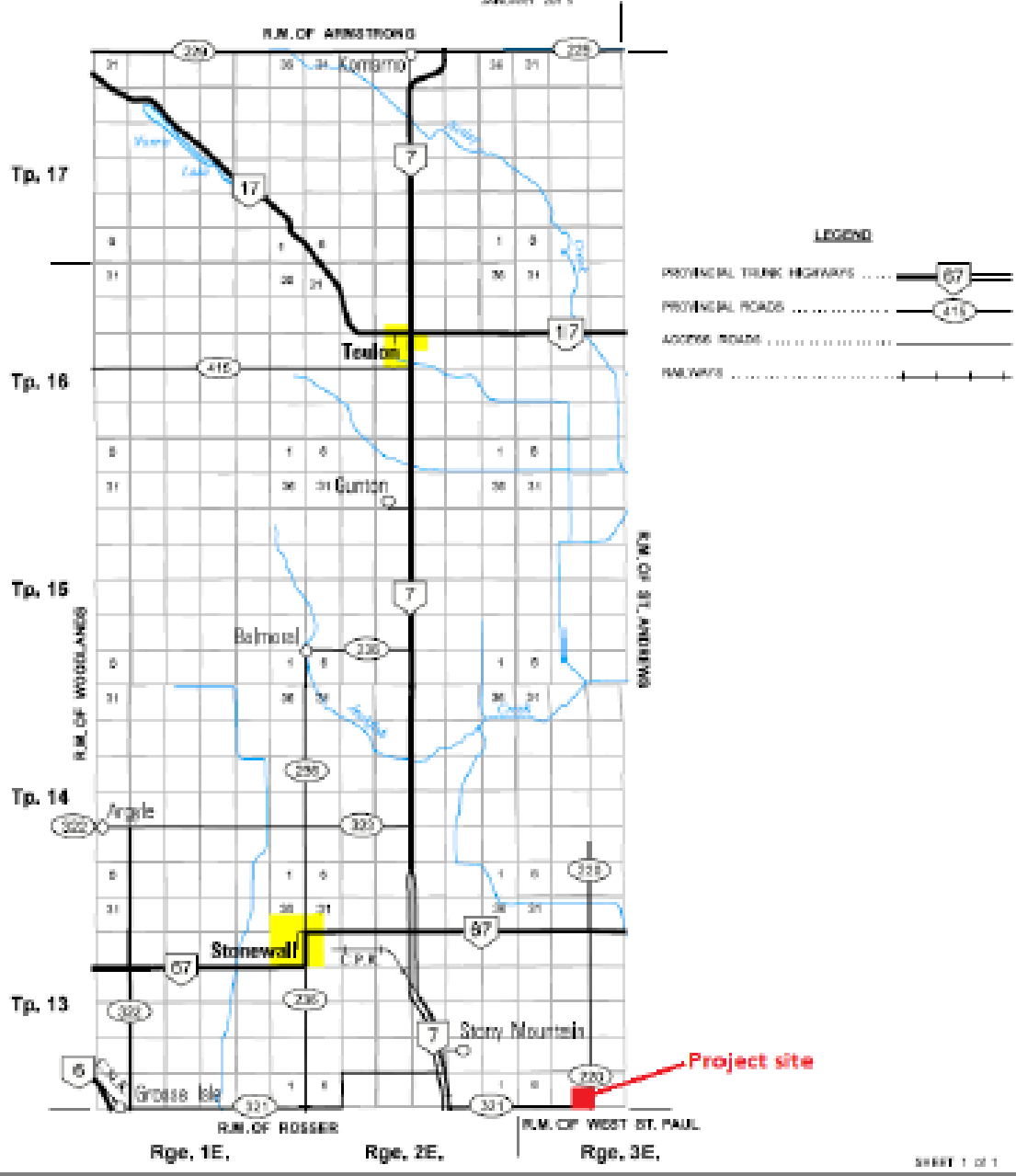
Proposal will involve the following:

- Proposed operation will continue utilizing the existing buildings on the premises
- Buildings will be converted to lambing barns from existing turkey barns
- Manure storage is by way of field storage
- Consuming 34,642 imperial gallons of water per day (from a municipal pipeline)
- Composting mortalities with permanent onsite composting site
- Additional shelterbelt planting to take place to south and east
- Using the truck haul routes as shown on page 6.

R.M. OF ROCKWOOD



PROVINCE OF MANITOBA
INFRASTRUCTURE
HIGHWAY PLANNING AND DESIGN BRANCH
GEOGRAPHIC & RECORDS MANAGEMENT SECTION
VERSION:
JANUARY 2015





C. SITE ASSESSMENT OVERVIEW

Assessment Overview Table

| Provincial Technical Overview of Canada Sheep and Lamb – Rockwood: | | | |
|--|----------------|---|------|
| Items Provided by Project Proponent | Con- firmed | Related Existing Provincial Safeguards | Dept |
| 1. Submitted complete Site Assessment | X | The proposal is consistent with the Provincial requirements for a Livestock Operation. | MR |
| 2. Clearly defined the project as an Animal Confinement Facility and Confined Livestock Area | X | Agricultural buildings such as barns over 6,458 sq.ft. require a building permit from the Fire Commissioner's Office. Each of the two barns undergoing renovations are 60' x 300' | MR |
| | | Construction of confined livestock areas requires a permit from Sustainable Development prior to commencement of construction. | SD |
| 3. Proposed Project Site Physical Suitability | X | This is a proposal to expand an existing 2,000 replacement ewe operation to 8,000 breeding ewes plus associated livestock. The proposal includes an outdoor confined livestock area. The suitability of the site and resulting construction requirements will be addressed in detail under the permit to construct the confined livestock area. The permit to construct the confined livestock area must be obtained <u>prior</u> to commencing construction of the confined livestock area. | Ag |
| 4. Proposed Project Site Flood Risk Potential | X | Water Management, Planning and Standards is not aware of any major overland flood hazard at this location. | MI |
| 5. Identified 34,642 litres/day required for proposed operation | X | According to the document signed on December 6, 2017, the proponent plans to use a public water source via pipeline. Water Use Licensing has no comment since all public water supplies are licensed by the Groundwater Licensing section. In the proposal, it is indicated that the municipal water pipeline will be used as the water source. As such, Environmental Compliance and Enforcement staff need all existing wells on the property identified and decommissioned as pre-regulatory requirements. | SD |

Provincial Technical Overview of Canada Sheep and Lamb – Rockwood:

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| | | The property is located within the Rockwood Sensitive Area. The Rockwood Sensitive Area Regulation 121/94 of the Environment Act regulates the drilling, sealing and modifying wells within the designated area. The regulation has been in effect since 1994. There is at least one well in the provincial database associated with this land location and it has been reported as being sampled as part of monitoring in the area after 1994. There are no sealing records for wells located on 5-13-3E. All unused water wells on the site shall be located and sealed through the permit process. Permit information can be obtained by contacting Manitoba Sustainable Development at 204-785-5030. | |
| 6. Proposed measures to meet storage and application regulations for manure | X | Any applicable permit or annual submissions under the Livestock Manure and Mortalities Management Regulation would be processed by Environmental Approvals Branch of Sustainable Development. The proposed operation would be required to register annual manure management plans. Manure management plans are reviewed by Branch staff for regulatory compliance at the time of submission. As soil nutrients change over time, SD staff have not dedicated resources to review the spreadfield information and soil tests in this site assessment. However, soil analysis reports are included in the manure management plans. Additional details on the required information for manure management plans, including mandatory sampling depth, soil analysis and completing the form are provided at: http://www.gov.mb.ca/sd/envprograms/livestock . | SD |
| 7. Proposed Project Site with suitable mortalities disposal methods | X | Information on disposal is provided in section 9 of the site assessment, which requires the proponent to select from 4 acceptable methods of disposal. More specific information is included in the Livestock Manure and Mortalities Management Regulation and at http://www.gov.mb.ca/sd/envprograms/livestock . | SD |
| 8. Proposed Project Site with acceptable odour control measures | X | The proponent has indicated that shelterbelts will be used. Should odour become a problem for neighbouring residents, there is a complaints process under <i>The Farm Practices Protection Act</i> . A person who is disturbed by any odour, noise, dust, smoke or other disturbance resulting from an agricultural operation may make a complaint, in writing, to the Manitoba Farm Industry Board. The Act is intended to | Ag |

Provincial Technical Overview of Canada Sheep and Lamb – Rockwood:

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| | | provide for a quicker, less expensive and more effective way than lawsuits to resolve nuisance complaints about farm practices. It may create an understanding of the nature and circumstances of an agricultural operation, as well as bring about changes to the mutual benefit of all concerned, without the confrontation and the expense of the courts. | |
| 9. Proposed Project Site that meets development plan and zoning by-law requirements | X | <p>The proposed livestock operation expansion is on land designated as A- Agricultural Area pursuant to the South Interlake Planning District Development Plan By-Law No. 3/10. The proposal complies with Development Plan Policies 2.3.4 Hazard Lands, Flooding and Erosion, specifically pertaining to the “Rockwood Sensitive Area Regulation” and Policy 3.3.1 pertaining to the expansion of existing livestock operations as the RM of Rockwood has indicated that the municipality can provide the water supply requested, at 1.82L/sec. They further indicate that no person may construct a new well or replace an existing well, without approval by resolution of Council within the “Rockwood Sensitive Area”.</p> <p>Under the RM of Rockwood Zoning Bylaw the proposed site is zoned AG-Agricultural General Zone. In this zone the expansion of existing livestock operations with 300 or more animal units are required to have a minimum site area of 80 acres, and a minimum site width of 600 feet. The proposed site will conform to these requirements.</p> <p>A livestock Operation is to be developed in accordance with Section 49.3 of the Zoning Bylaw when producing Animal Units over 300.</p> <p>For zoning compliance a livestock operation creating AUs between 801 and 1600 is required to meet a minimum mutual separation distance of 2264 ft from a Single Residence to an Earthen Storage Facility; 1132 ft from a single residence to an Animal Housing Facility and Non-Earthen Manure Storage Facility; a 9055 ft minimum setback from a designated Residential or Recreational Area to an Earthen Storage Site, and a 6037 ft setback from a Designated Residential or Recreation Area to an Animal Housing Facility and Non-Earthen Manure Storage Facility.</p> <p>It is acknowledged that a designated Rural Residential Area in the R.M. of West St. Paul is located in close proximity of the project site as well as a number of rural residences.</p> <p>There are single residences located within a distance less</p> | MR |

Provincial Technical Overview of Canada Sheep and Lamb – Rockwood:

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| | | <p>than the minimum 1132 ft. mutual setback requirement.</p> <p>A variance to vary this mutual separation setback to the closest residence will be required from Council to ensure compliance.</p> <p><i>The Planning Act</i> requires municipalities to issue development permits for any development on a site. All development must comply with the Zoning By-law and Development Plan. Any proposed development that does not meet the separation distances or setbacks requires Council approval and a public process to vary those requirements.</p> | |
| 10. Proposed Project Site that is a sufficient distance from native prairie, Wildlife Managements Areas and Crown Land. | X | Distances to these features is provided in section 10.5 of the site assessment. Where the distances exceed 1 mile, the department generally has no objection. | SD |
| 11. Proposed Spreadfields that are sufficient, and suitable for manure spreading | X | <p>In areas of lower livestock intensity such as the RMs of Rockwood and West St. Paul, it is currently the Province of Manitoba's policy to require sufficient suitable land for all of the nitrogen and half of the phosphorus generated by the livestock. This policy assumes that more land is available and could be brought into the Canada Sheep and Lamb Ltd manure management plan to balance phosphorus with crop removal, should it be necessary in the future.</p> <p>In order to determine the long-term land requirement for Canada Sheep and Lamb Ltd, nitrogen and phosphorus excretion by 8,000 ewes (plus associated livestock) is compared to nitrogen utilization and phosphorus removal by the proposed crops to be grown. The calculation takes into consideration typical, modern feeding practices for livestock production and realistic, long-term 10-year crop yields from the Manitoba Agricultural Services Corporation (MASC) for the RM of Rockwood. As proposed, Canada Sheep and Lamb Ltd requires 953 acres for manure application.</p> <p>Land suitability was determined using soil testing for phosphorus and soil survey to establish the agriculture capability. All of the lands with soil tests were below 60 ppm Olsen P, as required to be considered suitable. According to</p> | Ag |

Provincial Technical Overview of Canada Sheep and Lamb – Rockwood:

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| | | <p>detailed soil survey, the agriculture capability of the suitable land included in the proposal varies from Class 2 to 5. The limitations include salinity (N) and wetness (W).</p> <p>Canada Sheep and Lamb Ltd has demonstrated that they have access to 981 suitable acres for manure application. They have also proposed an additional 2624 acres without soil tests. This greatly exceeds the current land requirement.</p> | |
| 12. Proposed Spreadfields with sufficient minimum setbacks on Spreadfields from natural features (water sources etc.) | X | The proponent is required to demonstrate minimum setback distances listed in section 10.6 of the site assessment. | SD |
| 13. Proposed Spreadfields with sufficient minimum setbacks on spread fields from natural features (water sources etc) | X | Section 8.7 requires the proponent to indicate if all setbacks have been observed from and excluded from land base calculations. | SD |
| 14. Proposed Spreadfields that have been secured by spread agreements | X | All of the lands in the proposal are under agreement for manure application. | Ag |
| 15. Proposed Spreadfields that meet development plan and zoning by-law requirements | X | <p>The Spreadfields in the RM of Rockwood are located on lands designated A - Agricultural Area under the South Interlake Planning District Development Plan, ByLaw 3/10 and meet the intent of policy 3.3.1.</p> <p>The Spreadfields are zoned AG General Agricultural General Zone under the RM of Rockwood Zoning Bylaw are compliant with the intent of this zone</p> | MR |
| 16. Proposed trucking routes and access points that may impact | X | PR 220 is the proposed truck haul route. The subject property has frontage along PR 220 with an existing access. Our department will not approve any additional access onto PR 220. | MI |

| Provincial Technical Overview of Canada Sheep and Lamb – Rockwood: | | | |
|---|------------------------|---|-------------|
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| Provincial Roads or Provincial Trunk Highways | | Please be advised that any structures placed within the controlled area of PR 220 (125 feet from the edge of the right-of-way) require a permit from our office. The contact is Sheena del Rosario at (204) 945-3457. The placements of temporary drag lines or any other temporary machinery/equipment for manure application within the right-of-way of PR 220 requires permission from our regional office in Portage. Please contact the Regional Planning Technologist (Denise Stairs) at (204) 871-2239. In addition, please notify the Regional Planning Technologist for the placement of temporary draglines or other temporary equipment for manure application within the controlled area of PR 220 (125 feet from the edge of the right-of-way). | |
| 17. Proposed trucking routes – local roads | X | Under <i>The Planning Act</i> , municipalities as a condition of approval may require Canada Sheep and Lamb – Rockwood to enter into a Development Agreement regarding the condition and upkeep of local roads used as truck haul routes. | MR |
| 18. Declared Provincial Waterways | X | A proposed spread field in the NE quarter of 28-13-3E1 is adjacent to Parks Creek, a Provincial Waterway. Provincial Waterways are subject to Section 14 of the Water Resources Administration Act, which states: “No person shall place any material on, remove any material from, or construct, carry out, reconstruct, establish, or place, any works or structures on, over, or across, a provincial waterway, except as may be authorized in writing by the minister and subject to such terms and conditions as the minister may prescribe.” Water Management and Structures requires a Provincial Waterway Authorization be obtained for any development crossing or along a Provincial Waterway, including use of temporary flex/dragline manure pipes. | MI |

Provincial Departments

- Ag – Agriculture
- MR –Municipal Relations
- MI – Infrastructure
- SD – Sustainable Development

D. PUBLIC COMMENTS & DISPOSITIONS

| Public Comment Summary | |
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| <p>1. Bob and Linda Byle</p> | <p>In favor -Support letting it proceed with expansion plans.</p> |
| <p>2. Cheryl Ceprez Stony Mountain, MB</p> | <p>Have serious concerns: Am long term resident of RM Rockwood and reside near proposed site: -negative water and air implications from the waste -issues around the storage and handling of waste -issues related to the mortalities from the livestock -increase in large truck travel to transport lambs, manure, etc -already a large-scale farm in the area -monitoring that must be put in place to ensure the farm is complying with provincial and municipal requirements</p> |
| <p>3. Gary and Cathy Goresky 3-14-2E</p> | <p>Support – no problem with sheep farm in area –would be great asset to area; economic benefits would increase jobs, revenue and provide other ventures in wool industry. -ability to buy fresh lamb would be great instead of from NZ or Australia</p> |
| <p>4. Robert and Teresa Makowski Balmoral, MB</p> | <p>Fully Support -great opportunity for our region. -We come from a mixed farming background and are always concerned with diversity within the agriculture sector; with recent influx of immigrants to our region, lamb is a main source of their diet; provides commodity for our citizens and export is a real economic benefit for our region as well as the employment opportunities.</p> |
| <p>5. Glen Massey SW 4-13-3E</p> | <p>Support Lived at my site since 1977 quite close to site being looked at. All that time the land was zoned agricultural; that site was a turkey breeder farm for most of that time. I have no negative comments to say about the operations during all that time. I can only see this as being good for the Municipality, concerning economic benefits, added employment, and diversity to agricultural makeup within municipality and province.</p> |
| <p>6. Lawrence Pinsky WPG</p> | <p>Opposed We own land in area; smell and traffic of expanded sheep operations will hurt land values, hurt the environment, hurt the infrastructure and contribute little or nothing to the community. Before anything is done there should be extensive studies on all of these areas.</p> |

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| <p>7. Lana Lipkowitz Miller RD & Hwy 8 West St Paul</p> | <p>Concerns: proposed expansion is quite close to our farmland near Miller Rd:</p> <ul style="list-style-type: none"> -Increased truck traffic on Miller Rd; -smells emanating from the manure/animals of the operation -increased water consumption and the environmental impact on the surrounding farms and habitat -the water use increase on the public system seems huge -believe the changes would affect property values negatively both for future development and for farming -soil contamination -no way of knowing if there is adequate monitoring of the proposed operation by provincial or municipal governance to ensure ongoing that the above identified concerns do not become a reality. |
| <p>8. Colin Merritt 935 Blackdale Rd West St. Paul</p> | <p>Opposed</p> <ul style="list-style-type: none"> -we live very close to this property -am opposed to the expansion due to odor this many sheep will create -enough people and businesses that have animals in the area that already cause unpleasant odors we do not need more - This area is really starting to build up as a residential area and it seems improper to allow further build-up of animal production facilities. It will just lead to conflict and complaints by people who have built or will build houses in the area. |
| <p>9. Gerald Tycholis 2048 Rushman Rd. West St Paul</p> | <p>Strongly opposed:</p> <ul style="list-style-type: none"> - 20- year resident of area of concern - disgusted that the local government would even consider such an operation -Has our residential living area not learned from the past in regards to the "Rockwood Sensitive Area Groundwater Zone" We already have long term domestic water issues, why should farmers be able to do what they want, with such environmental & health risks to the residents in the area? - operation will only drive away future residential builds & new families to the area. -We are downstream from Bristol nightmare (see attached fact sheet), and Concord Colony, how can an additional approx., 13,000 animals be beneficial to the area drinking water? - Highway 321 & 220 are already major thoroughfares along with Rushman Rd. & Fulsher Rd. in West St. Paul. People living on Rushman & Fulsher Roads already deal with our roads being a short cut to highways # 321, 220, 7 & 8. -Sheep & Lamb operations will bring increased heavy traffic to area, creating more dust & unsafe conditions to our families & our children, due to the increased speeding heavy traffic |
| <p>10. John Livingston, Director of Planning and Property &</p> | <p>Concerns</p> |

**Community Services,
RM of West St Paul**

Distance

- The proximity of this livestock operation to a designated rural residential area with residential homes at approximately $\frac{1}{3}$ rd the required minimum distance. 6037' to 1935'.
- Reducing this setback may increase land use conflict between farming and non-farming land uses.
- This extreme variation $\frac{2}{3}$ closer than permitted appears not compliant with Livestock Expansion for required minimum separation distances zoning bylaw.

Impacts

- Livestock farming may create noise, dust, odor and increased traffic nuisances incompatible with adjacent land use in West St. Paul.
- Farming delivery / employee traffic migrating into portions of Blackdale Rd, Miller

Manure and Mortalities Management

- On site manure storage may present an additional risk to ground water contamination.
- Manure spread fields in close proximity to residential homes are not appropriate as odor can travel considerable distance with wind direction.
- Burial of animals on site may present a potential risk to groundwater contamination.

Other Concerns — Red River Planning District

- The buffer from the proposed expansion includes Rushman Road development (RRO), Blackdale Road development (A4) and Fulsher/Lawson Development (A4); which could curtail further developed/infill subdivision potential.
- The homes along Fulsher and Lawson are not even showing on the circulation map. This means the review committee may be missing out on the true number of homes in the radius.
- Impact on water and soil capacity would need to be assessed and determination if any additional costs to water testing for local residents or hauling of drinking water if water becomes contaminated.
- What is the maximum number of houses within the radius allowed for sheep producers in Manitoba? For pig it is 4 houses max for 6401-12800 units. Currently there is 23 residences marked in the radius on the map labeled SP- 2 but according to our maps (all public information) there are in excess of 55+ homes in the radius. Further to this, the 3km line and the map labelled SP- 2 from South-Man Engineering are of such poor quality the houses are hidden within the "glare of diffusion" of the map. I have enclosed two maps from Google Earth and Flash Earth which clearly identify these homes many of which are within the Rural Municipality of West St. Paul. There are several more Homes in Rockwood which again are not included within the radius. The Municipality is concerned that the presentation is flawed and there are just far to many homes within the 3km radius.
- Traffic, the trucking route for the livestock --- would they have a designated route to minimize impact of residents on Rushman or Blackdale road (i.e. no trucking permitted); as well as maintenance for the municipality to upkeep the road from added load.
- Water table to provide for the livestock vs. local residents. Is there capacity in the region to support the expansion without impacting sustainable levels for neighbouring residents?
- What are the possible restrictions in further developing residents in the buffer radius?
- Will they have to enter into an agreement acknowledging the use is there at minimum to minimize complaints to the local municipality?
- Are there any restrictions this would place on the Planning District when approving a new development or subdivision within the radius area? What legislation or additional approvals, if any, would need to be considered?

In addition, for information, I would add that there are approximately 60 lots that have homes or are vacant residential properties in the area that may have new homes in the near future within West St. Paul and the 3km radius. Not all are indicated in the *Land Use & Spread Field Map SP- 2*.

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| <p>11.</p> <p>Len & Janet Dacombe</p> <p>2310 Rushman Rd. West St Paul</p> | <p>Opposed</p> <ul style="list-style-type: none"> - very concerned that this plan will adversely affect the fresh water aquifer which has already experienced a disastrous contamination as a result of the Bristol Aerospace operation in the Stony Mountain region. The corrective measures to reverse this contamination have been in operation for over 15 years and the issue is still not resolved. The fresh water aquifer does not need another potential contaminant from a significantly large livestock expansion. - As we live in a growing residential development, we object that our development will be in such close proximity, and ultimately be surrounded by the proposed manure distribution. - Concerned with unpleasant odours from all directions will depreciate our property values in the future. - In our discussions with our municipal representatives, we found that they had not been approached or even made aware of the proposed expansion. This leads us to seriously question the approval process currently underway. - The proposed plan calls for a relaxation in the currently established guidelines with respect to the required distance from a designated residential development (subdivision in NW-33-12-3E). The variance application calls for reduction in the required distance from a designated development from 6,037 feet to only 1,935 feet. This represents a reduction in the required separation distance by over 68%, reducing the actual distance to only 32% of the approved regulated distance. We assume that the required regulated distance was established and based on valid scientific research parameters. This indicates to us that the proposed variance is much too large, and should not be approved. |
| <p>12.</p> <p>Ron and Lorraine Dacombe</p> <p>2286 Rushman Rd. West St Paul</p> | <p>Opposed - (area resident for past 38 years)</p> <p>Concerns with:</p> <ul style="list-style-type: none"> -impact on ground water aquifer <p>The proposed expansion is located at the south-east edge of the groundwater aquifer previously rendered unfit for human use by the improper disposal of toxic chemicals at Bristol Aerospace's Rockwood Propellant Plant. According to sheet SP-2 of the proposal an estimated 40 % of the manure spread fields proposed for this operation are to be located in the RM of West St Paul above the ground water aquifer still safe for human use and adjacent to residences that rely on well water. In addition, the area identified for the most easterly spread field in the RM of West St Paul is already used as a spread field for the large dairy operation located south-west of the intersection of Miller Rd and Blackdale Rd. Also of concern is the close proximity to the safe groundwater aquifer of the four southernmost spread fields in the RM of Rockwood. They make up 23 % of the total spread fields for this operation.</p> <ul style="list-style-type: none"> -number of residents within 3 km setback - The number of residences within the 3 km notification zone as presented on Sheet SP-2 of the proposal is completely inaccurate and artificially downplays the significant number of residences negatively impacted by this proposal. By way of example, section 33-12-3E (bounded by Blackdale Rd on the west, Rushman Rd on the north, Fulsher Rd on the East and Miller Rd on the south) is shown on sheet SP-2 to only |

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| | <p>have a total of 9 residences, 4 on the north and 5 on the south side of Rushman Rd for a total of 9 residences for the entire section. In actuality there are in excess of 50 residences adjacent to or located within this section that rely on well water. Furthermore, there are an additional 8 residences that rely on well water immediately adjacent to the two southern most spread fields, again within the RM of West St Paul, that are missing from sheet SP-2. This not only raises the question of the accuracy of the information contained on sheet SP-2 but of that contained in the remainder of the proposal as well</p> <p>-odour</p> <p>The prevailing winds in this area are typically from the north-west with the occasional south or south-easterly wind. Section 33-12-3E is directly south-east of the proposed main site location and 3 of the spread fields and will therefore be subjected to odour on a regular basis. When the winds are from the south the spread fields to the south will be a concern.</p> <p>-magnitude of variance request</p> <p>The current required distance from a designated development for operations such as the one proposed is 6,037 feet. This proposal requires a variance which would reduce this distance to only 1,935 feet. This represents a 68% reduction in the required separation distance. This is not an insignificant variance! The required regulated distance was established for a reason. It is alarming that such a drastic reduction in the required separation is being considered.</p> <p>- it would be more appropriate for an operation such as this to be located further into the area where the ground water is already unsafe for human consumption and measures are in place to provide potable water to neighboring homes. Expanding into the RM of West St Paul, where significant residential development has occurred and will continue to occur (point 2 above), will lead to ongoing conflict.</p> |
| <p>13. David & Amanda Dacombe 2364 Rushman Rd. West St Paul</p> | <p>Opposed</p> <p>-concerned how this plan will adversely affect the fresh water from the wells in this region;</p> <p>-allowing (or even considering) another significant contaminant from a large livestock expansion is not necessary or wise.</p> <p>- recently moved here, concerned in direct proximity and line of sight to the proposed expansion and concerned with odour from the proposed manure distribution and from livestock operation itself and it will ultimately depreciate our property</p> <p>- proposal will negatively impact the current and future residential expansion of this</p> |
| <p>14. C. & Wendy Maxwell</p> | <p>Against proposal</p> <p>a) Our understanding is that the Bristol pipeline system was developed for residential use only. The original system required that each user was to have a restrictive valve installed on their line, as the system was designed. We can't understand how all of a sudden an additional 35,000 imperial gallons per day can be created without adversely effecting current users. Should an engineering review not take place,</p> |

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| | <p>“before” the proposal is evaluated? If a well system is used the current contaminate could be drawn south east to affect the wells on Rushman Road/Fulscher Road/Lawson Blvd.</p> <p>b) The application is not correct in that it does not have an accurate count of the homes in the buffer zones. What other information is incorrect?</p> <p>c) Our other concerns are as follows:</p> <ol style="list-style-type: none"> 1.The noise, odour, and pollution of 8000 Ewes, 100 Rams and 4558 Lambs, spread fields and mortalities. 2.Very concerned of depreciation of our house and land. 3.Too close to residential houses (half mile) 4.Multiple bright pole lights. 5.Increase of unwanted predators (coyotes) |
| <p>15. Laurie Ellwood & Joel Gillespie 2314 Rushman Rd West St. Paul</p> | <p>Opposed</p> <ul style="list-style-type: none"> -This expansion will negatively impact the fresh water aquifer in the area -We experienced contamination from the Bristol Aerospace operation approximately 20+ years - odour from the proposed sheep and lamb operation is another concern many homes and families within close proximity to the proposed farm operation. - spreading of manure will ultimately result in unpleasant odour for all residents. - We built our home in the RM of West St Paul in 1998. Both the contamination of our clean water source and the unpleasant odour from the manure / operation will ultimately depreciate our property values. |
| <p>16. Kendal Roehle Kelroe Farms</p> | <p>Fully Support</p> <ul style="list-style-type: none"> -We are nearby dairy and grain farmers and believe this expansion should be approved -Our area is an agricultural area and we believe that any growth in agriculture in our province, no matter what commodity, should be approved and welcomed. -We know our province has guidelines that every farmer must abide by; thereby protecting our people and our environment for future generations, so we have no worries about that at all. |
| <p>17. Christine Skakun</p> | <p>Concerns</p> <p>I have the following concerns; (dwelling ½ mile from site)</p> <ol style="list-style-type: none"> 1. Why was I not directly notified of the application? 2. The operation is looking to be made exempt from 2/3 of the required provincial standard for a buffer zone from a residential area. If it is a minimum provincial standard, why is this type of operation being considered? 3. What type of contamination can I expect from this type of operation...air, water, soil, etc.? 4. What type of noise will the operation produce? 5. Will this operation cause increased traffic flow down the gravel roads in the area? |

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| | Will the gravel be replaced more often if it is used more frequently and deteriorating because of this? |
| <p>18.</p> <p>Brad Schilke 2214 Rushman Rd. West St Paul</p> | <p>Concerns</p> <p>1. How will an undersized water system, created for residential use, adequately address the needs of an extensive livestock operation without adversely affecting the existing residential users?</p> <p>How long before well water becomes a necessity and the pollution plume arrives on our road?</p> <p>2. How will the livestock operation affect my property value? An operation of this size will create odor & noise.</p> <p>3. The application lists properties for manure disposal. I witnessed the local dairy spreading manure on one of those properties last fall. Can one property be used by many different operations to spread manure?</p> <p>4. The application does not accurately list all residential properties within the control area. Are there errors on this application?</p> |
| <p>19.</p> <p>John Douglas 2206 Rushman Rd. West St. Paul</p> | <p>Concerns</p> <p>1.As a household using a well as our sole source of water, we fear that this operation may contaminate our well. My assumption is that they plan on pulling water from the same water system that is currently in place which would be undersized as it was created for residential use. How would this adequately address the needs of an extensive livestock operation without adversely affecting the existing residential users? Paying existing rates, the cost of water would be immense and an unsustainable expense. How long before well water becomes a necessity and the pollution plume arrives on Rushman Road, Lawson Blvd, Blackdale Road, and Fulsher Road thereby affecting over 100 residents?</p> <p>2. How will the livestock operation affect my property value? An operation of this size will create odor & noise.</p> <p>3. The application lists properties for manure disposal. I witnessed the local dairy spreading manure on one of those properties last fall. Can one property be used by many different operations to spread manure?</p> <p>4. The application does not accurately list all residential properties within the control area. There are no homes shown on Lawson Road, Fulsher Road, Miller Road... Are there errors on this application? I know of people who live along Rushman Road that did not even receive the notice in the mail. How can you be sure that everyone has been notified of the application if it was only mailed out once and didn't get placed in everyone's mailbox?</p> |
| <p>20.</p> <p>Todd Douglas 2194 Rushman Rd West St. Paul</p> | <p>Concerns</p> <p>I have lived in the area all my life, I understand farming it is part of the area, my parents have a cow/calf operation. The size of this sheep operation is overwhelming.</p> <p>1. How will an undersized water system, created for residential use, adequately address the needs of an extensive livestock operation without adversely affecting the existing residential users?</p> <p>Based on my rough calculation (156.81/m2/day x 365 days x\$2.84/m2) it looks like it will cost this operation \$162,549.00 per year for water only</p> |

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| | <p>services. I don't believe that this is a sustainable expense. How long before well water becomes a necessity and the pollution plume arrives on Rushman Road, Lawson Blvd, Blackdale Road, and Fulscher Road thereby affecting over 100 residents?</p> <p>2. How will the livestock operation affect my property value? An operation of this size will create odor & noise.</p> <p>3. The application lists properties for manure disposal. I witnessed the local dairy spreading manure on one of those properties last fall. Can one property be used by many different operations to spread manure?</p> <p>4. The application does not accurately list all residential properties within the control area. Are there errors on this application?</p> |
|--|--|

THE 20 PUBLIC COMMENTS IN THEIR ENTIRETY MAY BE VIEWED ON THE PUBLIC REGISTRY AT

[HTTP://WWW.GOV.MB.CA/MR/LIVESTOCK/TRC-12-033.HTML](http://www.gov.mb.ca/mr/livestock/trc-12-033.html)

THE PROPONENT'S RESPONSE TO THE PUBLIC COMMENTS MAY BE VIEWED IN THE ATTACHED APPENDIX AND ON THE PUBLIC REGISTRY AT THE ABOVE IDENTIFIED WEB LINK.

E. CONCLUSIONS & RECOMMENDATIONS

Overall Conclusion

The information contained in the Site Assessment submitted by the proponent generally meets Provincial requirements. In addition, based on available information it has been determined that the proposed operation will not create a risk to health, safety or the environment, or that any risk can be minimized through the use of appropriate practices, measures and safeguards.

Recommended Actions to Council

- As per Section 114(1) of The Planning Act, Council must set a date for a Conditional Use hearing which must be at least 30 days after it receives this report

- As per Section 114(2) of The Planning Act, at least 14 days before the date of the hearing, Council must:
 - a) send notice of the hearing to
 - (1) the applicant,
 - (2) the minister, (c/o the Selkirk / Interlake Community & Regional Planning Office)
 - (3) all adjacent planning districts and municipalities, and
 - (4) every owner of property located within three kilometres of the site of the proposed livestock operation, even if the property is located outside the boundaries of the planning district or municipality;
 - b) publish the notice of hearing in one issue of a newspaper with a general circulation in the planning district or municipality; and
 - c) post a copy of the notice of hearing on the affected property in accordance with Section 170 of The Planning Act.
- Council should specify the type(s) of operation, legal land location, number of animals in each livestock category and total animal units in its Conditional Use Order.
- As per Section 117 of The Planning Act, Council must send a copy of its (Conditional Use Order) to
 - a) the applicant;
 - b) the minister (c/o the Selkirk / Interlake Community & Regional Planning Office); and
 - c) every person who made representation at the hearing.
- Council will note that there are residences within the RM of Rockwood that are located closer than the minimum 1132 ft. set back requirement of the AG Zone to an Animal Housing Facility and/or Non-Earthen Manure Storage Facility. To ensure Bylaw compliance, the proponent will need to obtain a variance to the closest residence in NE 5-13-3E which would involve a variation to this set back from 1132 ft. to 792 ft.

Council is welcome to contact Manitoba Sustainable Development's Technical Review Officer with Environmental Approvals Branch as well as regional Environmental Compliance and Enforcement staff to discuss environmental compliance issues, if applicable, with respect to the Livestock Manure and Mortalities Management Regulation (M.R. 42/98).

Recommended Actions to Proponent

- For the single residences located within a distance less than the minimum 1132-foot setback requirement to an Animal Housing Facility and/or Non-Earthen Manure Storage Facility, a Variance to the closest residence should be applied

for and obtained from the RM of Rockwood to ensure Bylaw compliance in the AG- Agricultural General Zone of the RM of Rockwood Zoning Bylaw.

That any additional measures identified through subsequent Provincial and Federal licensing or permitting in order to minimize any identified risks to health, safety and the environment be undertaken.

F. TECHNICAL REVIEW COMMITTEE MEMBERS

| Name | Department | Title | Telephone |
|-------------------------|-------------------------|--|------------------|
| Don Malinowski Chair | Municipal Relations | Senior Planner Community & Regional Planning Branch | 945-8353 |
| Petra Loro | Agriculture | Livestock Environment Specialist Agri-Resource Branch | 945-3869 |
| Jen Webb | Sustainable Development | Manager Environmental Approvals Branch | 945-8541 |
| Jeff DiNella | Infrastructure | Senior Development Review Technologist Highway Planning and Design Branch | 945-2664 |

Appendices

In depth analysis and individual reports from each department commenter

LIVESTOCK TECHNICAL REVIEW COMMITTEE

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Canada Sheep and Lamb - Rockwood
PROPOSAL NAME: Pat Smith
TYPE OF OPERATION: 1333 Animal Unit Replacement Ewes
RURAL MUNICIPALITY: Rockwood
OPERATION LOCATION: SE 05-13-03 EPM

Environmental Stewardship Division; Environmental Approvals Branch

- No concerns.

Environmental Stewardship Division; Environmental Compliance & Enforcement Branch, Central Region

- The livestock operation is located with the Rockwood Sensitive Area. The Rockwood Sensitive Area is a defined region within the Rural Municipalities of Rockwood, St. Andrews, West St. Paul and Rosser, where a part of the Carbonate aquifer has been impacted by organic solvents.

The Rockwood Sensitive Area Regulation (MR 121/94 was developed in 1994 to ensure that wells are appropriately drilled and abandoned in the designated sensitive area. The Regulation requires that Permits be obtained from Manitoba Sustainable Development prior to drilling, modifying, or abandoning a well within the designated area.

The proposal, in is indicated that the municipal water pipeline will be used as the water source. As such, we need all existing wells on the property identified and decommissioned as pre regulatory requirements.

Biodiversity & Land Use Division; Wildlife & Fisheries Branch; Habitat, Biodiversity & Endangered Species section

No wildlife related concerns.

Parks and Regional Services Division; Central Region

No comment

Water Stewardship Division; Water Science & Management Branch

- The property is located within the Rockwood Sensitive Area. The Rockwood Sensitive Area Regulation 121/94 of the Environment Act regulates the drilling, sealing and modifying wells within the designated area. The regulation has been in effect since 1994. There is at least one well in the provincial database associated with this land location and it has been reported as being sampled as part of monitoring in the area after 1994. There are no sealing records for wells located on 5-13-3E. All unused water wells on the site shall be located and sealed through the permit process. Permit information can be obtained by contacting Manitoba Sustainable Development at 204-785-5030. Sealing should consist of grouting the entire length of the well. A sealed well report should be filed with the Groundwater Management Section of Sustainable Development for each well sealed.

- During manure application all groundwater features, including water wells, should be given as a minimum, the amount of buffer as outlined in the regulations.
- The proponent has acknowledged the setback areas for all water features have been observed and excluded from landbase calculations. Setbacks should be clearly communicated and observed by those involved in manure application in order to minimize the risk of nutrients entering surface waters.
- Proper nutrient management applications that avoid excess loss of nutrients to surface waters are needed on lands receiving manure in southern Manitoba because long-term trend analysis of total phosphorus and total nitrogen has shown significant increases in these nutrients in the Assiniboine and Red rivers (Jones and Armstrong 2002);
- The proponent plans to apply solid sheep manure to both annual (245 acres) and perennial (736 acres) cropland by surface broadcast followed with incorporation. Incorporation will not be possible for alfalfa beyond the year of establishment so the majority of manure will be applied by broadcast application without incorporation. Without incorporation, the majority of manure nutrients remain on the soil surface for an extended time and even with incorporation a portion of the manure remains on the soil surface. Risk of nutrient loss in runoff from solid manure applications can be reduced when applications are completed in spring or between cuts of perennial forages. However, when this is not possible, risk can be reduced if fall application of solid manure occurs before mid-October (even when incorporated, manure applied shortly before freeze up is more susceptible to nutrient runoff losses during spring snowmelt than if the manure is applied earlier in the fall or in the spring). To further reduce the risk of runoff losses of nitrogen and phosphorus, application should not occur to saturated, frozen or snow covered soils or when heavy rainfall is expected within 24 hours.
- Manure tends to have an excess of phosphorus (P) compared to nitrogen (N) and as a result, for most crops, application at N based rates causes a buildup of soil P.
- Manitoba has included phosphorus as a nutrient by which fertilizer application through manure, synthetic fertilizer, and municipal waste sludge to agricultural lands may be limited. To remain environmentally sustainable over a long-term planning horizon of 25 years or more, the proponent must be able to balance phosphorus inputs from applied manure and other nutrient sources such as commercial fertilizers with crop removal rates to avoid excessive build-up in soils. The proponent has identified 981 acres of land suitable for manure application. Under current cropping practices, this will allow for phosphorus application at the 2 times crop removal rate (953 acres required). Application of phosphorus at the 2 times crop removal rate will slow the rate of phosphorus buildup but contrary to the claim made in the proposal (section 14.0) this is not environmentally sustainable over the long term. Consequently, the proponent has acknowledged that in the future, sufficient land base (up to 1906 acres) must be available so that manure can be applied at no more than 1 times crop removal rates to ensure long-term sustainability. It should be noted that Olsen soil-test phosphorus levels of 60 ppm are well above phosphorus needs for most crops (over 20 ppm is usually considered very high), and that as excess phosphorus levels build up in soils, greater losses occur to surface and ground water. It is also important to rotate manure application across all spread fields so as to prevent excessive P buildup.

Water Stewardship Division; Water Use Licensing Branch; Groundwater Licensing section

According to the document signed on December 6, 2017, the proponent plans to use a public water source via pipeline. Water Use Licensing has no comment since all public water supplies are licensed by the Groundwater Licensing section.

Biodiversity & Land Use Division; Lands Branch; Provincial & Regional Land Management Planning section

Land Management & Planning Section has no comments as no Crown lands (surface tenure) are proposed to be impacted by the proposal's intent or use.



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Don Malinowski
Senior Planner
Community & Regional Planning Branch
Technical Review Section
604-800 Portage Ave.
Winnipeg MB
R3G 0N4

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 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 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.