



TECHNICAL REVIEW COMMITTEE

**A TECHNICAL REVIEW REPORT
PREPARED FOR**

**THE RURAL MUNICIPALITY
OF GRAHAMDALE**

GALL FAMILY FARM LTD.

**NE ¼ 33-26-8WPM and
NW ¼ 33-26-8 WPM**

TRC 12 – 062

February 6, 2020

Re-issued February 13, 2020

A. INTRODUCTION – THE TEAM

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

- Agriculture and Resource Development (ARD); Livestock Environment, Nutrient Management and Business Development Specialists, Agricultural Engineer, and Veterinarians, Habitat Mitigation and Wildlife Land Specialist, Regional Wildlife Manager, Groundwater Specialist, Land-Water Specialist
 - Municipal Relations (MR); Community Planners
 - Infrastructure (MI); Development Review Technologists, Engineering and Operations Division; Development Review Officers, Water Management and Structures Division
 - Conservation and Climate (CC); Environment Officer, Water Rights Licensing Technologist
- and
- Any other specialist or department that may have an interest, which may be consulted during the process.

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

THE REPORT (TRC Process Box 10)

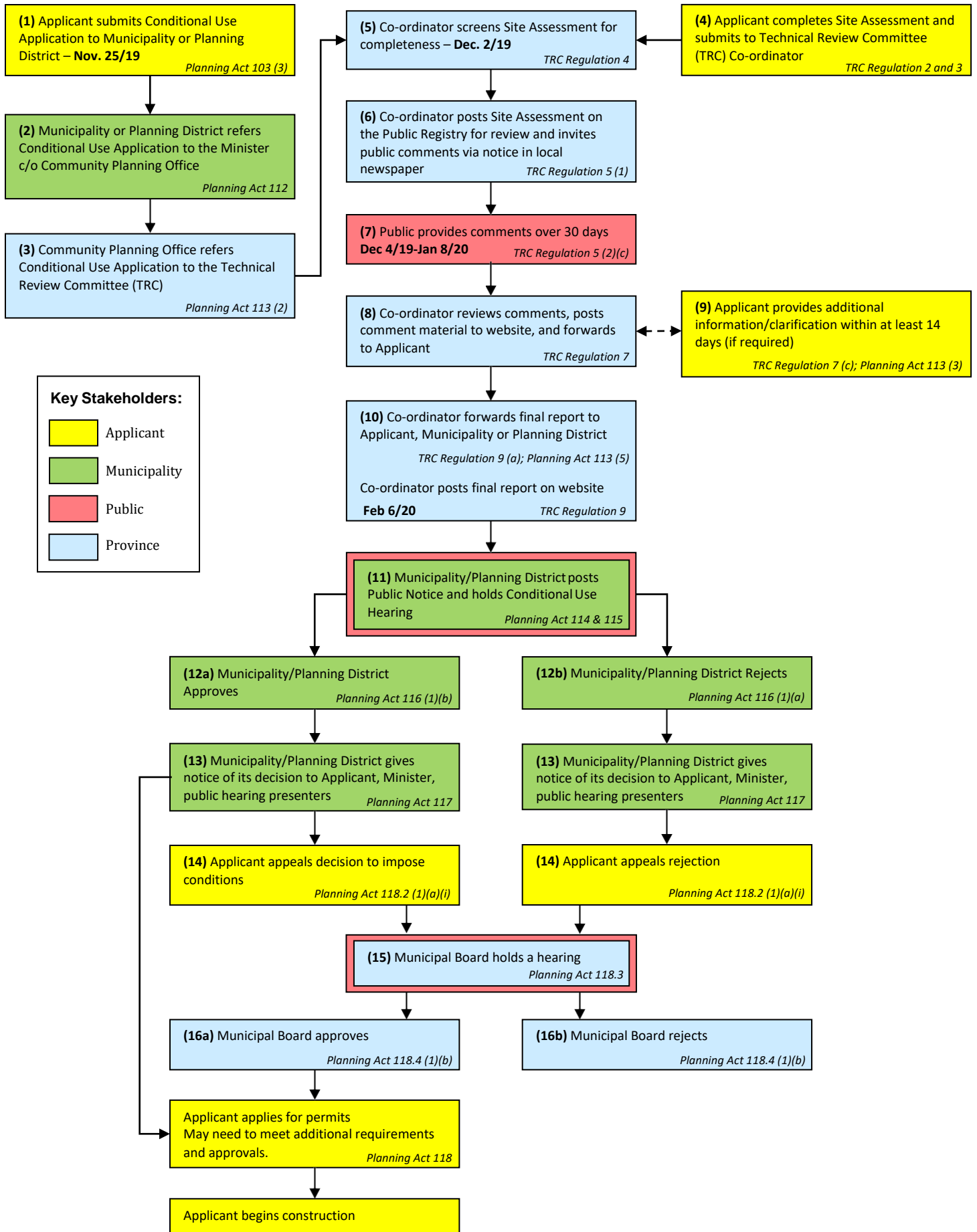
Prime Purpose of TRC Reports

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.

Livestock Technical Review Process (November 1, 2019)



B. DESCRIPTION OF PROPOSED LIVESTOCK OPERATION

To view a detailed description, go to:

<http://www.gov.mb.ca/mr/livestock/index.html>

Applicant: Gall Family Farm Ltd.

Site Location: --- NE 33-26-8 WPM and NW 33-26-8 WPM. Approximately 3 ½ miles west of Moosehorn on Road 156, 1 mile north of PR 237.

Proposal: To establish a beef operation of 550 beef cows and 430 heifers/steers (903 Animal Units total) within a confined livestock area.

This will involve the following:

- Constructing animal confinement facilities (seasonal feeding areas)
- Using field storage for manure
- Consuming 14,741 imperial gallons of water per day
- Composting mortalities
- Using the truck haul routes as shown in Maps below





R.M. OF GRAHAMDALE

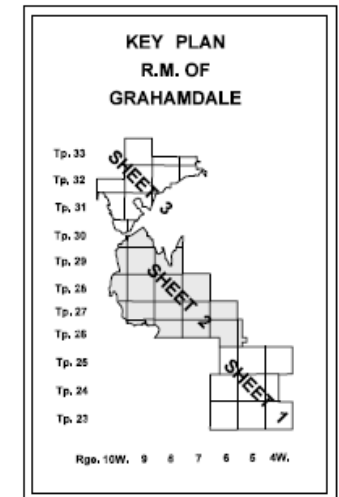
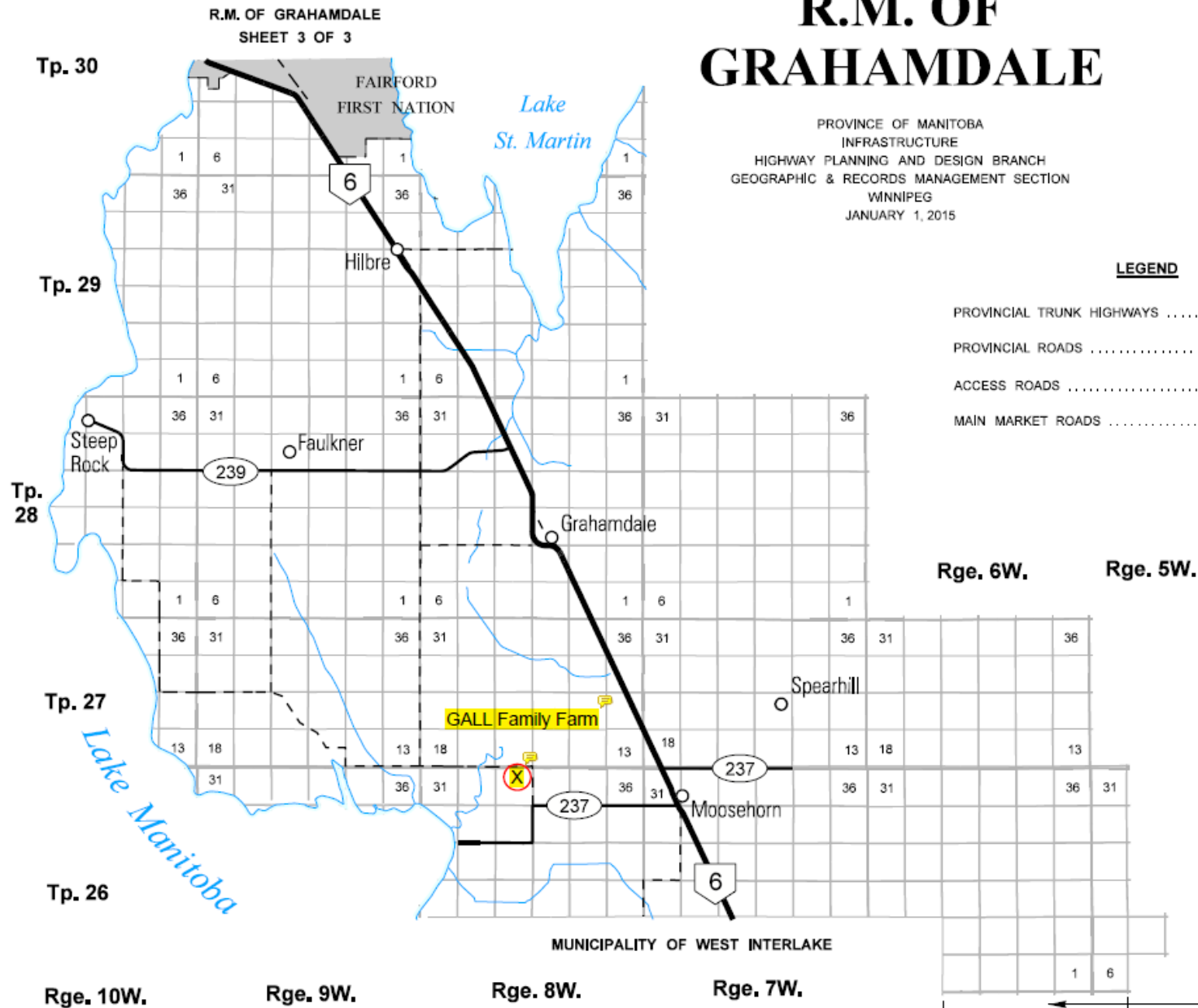
PROVINCE OF MANITOBA
 INFRASTRUCTURE
 HIGHWAY PLANNING AND DESIGN BRANCH
 GEOGRAPHIC & RECORDS MANAGEMENT SECTION
 WINNIPEG
 JANUARY 1, 2015



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 SCALE IN KILOMETRES

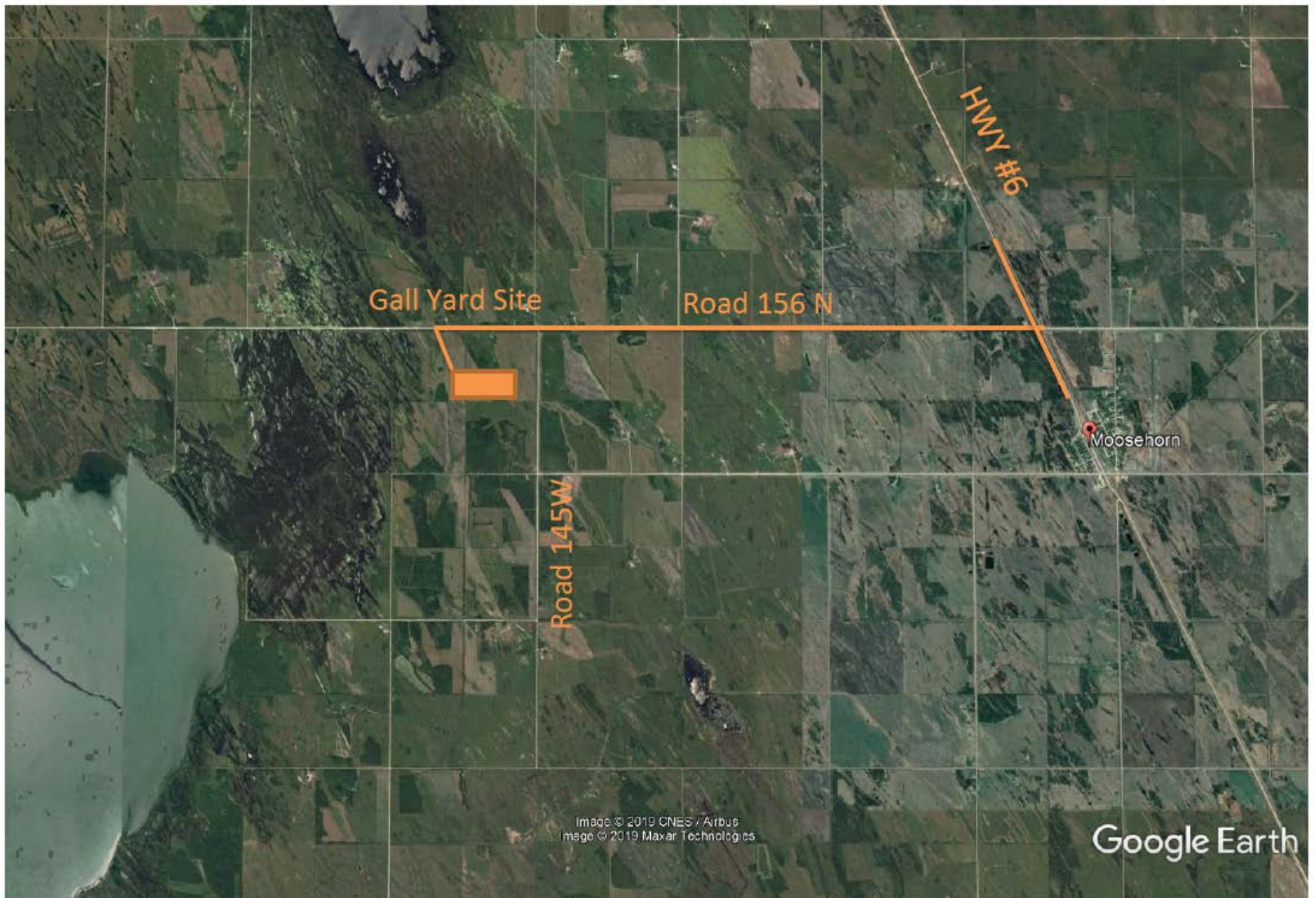
LEGEND

- PROVINCIAL TRUNK HIGHWAYS 
- PROVINCIAL ROADS 
- ACCESS ROADS 
- MAIN MARKET ROADS 



R.M. OF
 GRAHAMDALE
 SHEET 1 OF 3





TRUCK ROUTE

C. SITE ASSESSMENT OVERVIEW

Assessment Overview Table

Provincial Technical Overview of TRC 12-062 – Gall Family Farm Ltd.			
Items Provided by Project Proponent	Confirmed	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. Proposed Project Site Physical Suitability	X	According to reconnaissance soil survey (1:126,720), Gall Family Farm Ltd is located on land that is predominantly agriculture capability Class 4DP.	ARD
3. Proposed Project Site Flood Risk Potential	X	<p>The majority of this area appears to have been flooded in the June 13, 2011 flood event on Lake Manitoba.</p> <p>The natural ground elevation of this site ranges from 248 metres to 253 metres (813.65 feet to 830 feet).</p> <p>The Flood Protection Level for N 33-026-08W1 ranges between 249.25 metres to 249.32 metres (817.75 feet and 818 feet).</p> <p>If approved, any permanent structures should be built on land above 818 feet or on land build up to a level of at least 818 feet using clean impervious fill.</p>	MI
4. Identified 14,751 imperial gallons /day required for proposed operation	X	Under the Water Rights Act, all operations using more than 25 000 litres (5,499 Imperial gallons) of water per day must hold a Water Rights Licence. There is currently no Water Rights Licence issued at this site. Therefore, based on our understanding of the proposed project, an Application to Construct a Well and Divert Groundwater will be required.	CC
5. Proposed measures to meet storage and application regulations for manure	X	The Environmental Approvals Branch of Conservation and Climate is responsible for administering the Livestock Manure and Mortalities Management Regulations (LMMMR). The applicant must submit annual Manure Management Plans (MMP) in accordance with the LMMMR. Details on the requirements for MMPs, as well as design guidelines and applications forms for manure storage facilities are available at: https://www.gov.mb.ca/sd/waste_management/livestock	CC
6. Proposed Project Site with suitable mortalities disposal methods (composting)	X	The proponent has indicated that mortalities will be dealt with by composting. This is an acceptable disposal method under the LMMMR. If a disease outbreak should occur requiring mass disposal, Galls will be in touch with Conservation and Climate to work out a plan for disposal either through burial or transport to an approved landfill site.	CC

Provincial Technical Overview of TRC 12-062 – Gall Family Farm

Items Provided by Project Proponent	Confirmed	Related Existing Provincial Safeguards	Dept
7. Proposed Project Site with acceptable odour control measures	X	Should odour become a problem for neighbouring residents, there is a complaints process under The Farm Practices Protection Act. 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 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.	ARD
8. Proposed Project Site that meets development plan and zoning by-law requirements	X	The proposed project site is appropriately designated as an Agricultural Rural Area in the RM of Grahamdale Development Plan By-law 936/2005. The proposed project area is appropriate zoned as an “AG” Agricultural General Zone in the RM of Grahamdale Zoning By-law 937/2005. The application satisfies the applicable minimum separation distances shown in Table 5.4 of the Zoning By-law.	MR
9. Proposed Project Site that is a sufficient distance from native prairie, Wildlife Management Areas and Crown Land	X	The distance of the project exceeds 1 mile from Crown land. Lands Branch has no objection to the proposal.	ARD
10. Proposed Spread fields that are sufficient, and suitable for manure spreading	X	Manitoba Agriculture and Resource Development staff recalculated the land requirements assuming that all of the cattle are off-site for the summer (see Section 13). Gall Family Farm Ltd requires approximately 637 acres of suitable land for manure application based on this assumption. They have demonstrated that they have access to 991 acres of suitable land for manure application. (See Appendix A).	ARD
12. Proposed Spread fields with sufficient minimum setbacks on Spread fields from natural features (water sources etc.)	X	The proponent has acknowledged the setback areas for all water features have been observed and excluded from land base calculations. Setbacks should be clearly communicated to and observed by those involved in manure application to minimize the risk of nutrients entering surface and groundwater. (See Appendix B).	ARD

Provincial Technical Overview of TRC 12-062 – Gall Family Farm Ltd.

Items Provided by Project Proponent	Confirmed	Related Existing Provincial Safeguards	Dept
13. Proposed Spread fields that have been secured by spread agreements	X	The proponent has indicated that 599 acres for manure application are owned by Gall Family Farm Ltd and 392 acres are under agreement for manure application. They have also indicated that there is an additional 5000 acres of Crown land under lease that will be used as summer pasture for all of the cattle.	ARD
14. Proposed Spread fields that meet development plan and zoning by-law requirements	X	The proposed spread fields are appropriately designated and zoned.	MR
15. Proposed trucking routes and access points that may impact Provincial Roads or Provincial Trunk Highways	X	The proposed truck haul routes utilizes a municipal road with an existing access connection onto PTH 6. We do not anticipate a significant increase in use of that access. Please be advised of the following Manure spreading: please note that any structures placed within the controlled area of PTH 6 or PR 237 (125 feet from the edge of the right-of-way) requires a permit from our office. The contact is Sheena del Rosario at (204) 945-3457 or sheena.delrosario@gov.mb.ca . The placement of temporary draglines or any other temporary machinery/equipment for manure application within the right-of-way of PTH 6 and PR 237 requires permission from our regional office in Dauphin. Please contact the Regional Planning Technologist (Cheri Percival) at (204) 572-1455. 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 PTH 6 and PR 237 (125 feet from the edge of the right-of-way).	MI
16. Proposed trucking routes – local roads	X	Under <i>The Planning Act</i> , municipalities as a condition of approval may require the proponent to enter into a Development Agreement regarding the condition and upkeep of local roads used as truck haul routes.	MR
17. Declared Provincial Waterways	X	The Watchorn Creek Provincial Waterway is directly North and directly West of the proposed site in N-33-026-08W1. Any construction on this drain or the drain right-of-way including transporting manure across the drain will require Provincial Waterway Authorization through Water Management and Structures. Fishline Drain Provincial Waterway is also directly adjacent to the proposed site to the East.	MI

D. PUBLIC COMMENTS & DISPOSITIONS

Public Comment Summary	
<p>David and Marlene Metner PO Box 8 Moosehorn, MB. ROC 2E0</p>	<p>Opposed</p> <p>Commenter's family have been neighbours of Gall's for 100+ years. Proposed relocation would result in significantly more cattle being located to subject land (30-40 to 903). The subject land drains into Lake Manitoba at the Moosehorn Beach Provincial Campground. There are five natural springs on property to the south which is a source of drinking water. Commenter is concerned about proposed operation contaminating the aquifer.</p> <p>Concerned about noise and smell from the large quantity of cattle and cattle manure. Commenter claims dead cattle are not disposed of properly, and are left to rot and attract wild animals.</p> <p>The proposed spreadfields are subject to spring flooding and are not suitable for spreading manure as they drain directly into the provincial drainage system during flooding each spring.</p>
<p>Ryan and Andrea Metner PO Box 305 Moosehorn, MB. ROC 2E0</p>	<p>Opposed</p> <p>Commenter's family have been neighbours of Gall's for 100+ years. Proposed relocation would result in significantly more cattle being located to subject land (30-40 to 903). The subject land drains into Lake Manitoba at the Moosehorn Beach Provincial Campground. There are five natural springs on property to the south which is a source of drinking water. Commenter is concerned about proposed operation contaminating the aquifer.</p> <p>Concerned about noise and smell from the large quantity of cattle and cattle manure. Commenter claims dead cattle are not disposed of properly, and are left to rot and attract wild animals.</p> <p>The proposed spreadfields are subject to spring flooding and are not suitable for spreading manure as they drain directly into the provincial drainage system during flooding each spring.</p>
<p>Victoria Metner Box 175 Moosehorn, MB. ROC 2E0</p>	<p>Concerned</p> <p>Commenter's family have been neighbours of Gall's for 100+ years. Proposed relocation would result in significantly more cattle being located to subject land (30-40 to 903). The subject land drains into Lake Manitoba at the Moosehorn Beach Provincial Campground. There are five natural springs on property to the south which is a source of drinking water. Commenter is concerned about proposed operation contaminating the aquifer.</p> <p>Concerned about noise and smell from the large quantity of cattle and cattle manure. Commenter claims dead cattle are not disposed of properly, and are left to rot and attract wild animals.</p> <p>The proposed spreadfields are subject to spring flooding and are not suitable for spreading manure as they drain directly into the provincial drainage system during flooding each spring.</p>

A full copy of the public comments as well as the proponent's response may be viewed on the public registry at:

<http://www.gov.mb.ca/mr/livestock/index.html>

See Appendix C for department responses and Appendix D for the proponent's responses to the public comments.

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.
- 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 Community 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;and
 - b) 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 Community Planning Office); and
 - c) every person who made representation at the hearing.
- 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.

Council is welcome to contact Manitoba Conservation and Climate - Environmental Approvals Branch or Regional Environmental Compliance and Enforcement staff, with respect to the Livestock Manure and Mortalities Management Regulation (M.R. 42/98) including compliance and enforcement issues.

Recommended Actions to Proponent

- 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 Planning Branch	945-8353
Petra Loro	Agriculture and Resource Development	Livestock Environment Specialist Agri-Resource Branch	918-0325
Shannon Beattie	Conservation and Climate	Policy Analyst Sustainable Resource & Economic Policy Branch	792-6269
Jeff DiNella	Infrastructure	Senior Development Review Technologist Highway Planning and Design Branch	945-2664

Appendix A
Agriculture and Resource Development
January 2020
Petra Loro

Gall Family Farm Ltd has met the land requirements for 550 beef cows plus associated livestock and 430 backgrounders as follows:

In areas of lower livestock intensity such as the RM of Grahamdale, 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 Gall Family Farm Ltd manure management plan to balance phosphorus with crop removal, should it be necessary in the future.

In order to determine the land requirements for the proposed Gall Family Farm Ltd operation, nitrogen and phosphorus excretion by all of the cattle 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 beef production and realistic crop yields from the Manitoba Agricultural Services Corporation (MASC).

Land suitability is 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. Only reconnaissance soil survey is available to determine the agriculture capability of the land. The agriculture capability of the land included in the proposal ranges from Class 4 to Class 6 with some areas of organic soils. The primary limitations are wetness (W), density (D) and stoniness (P). The proponent has indicated that areas of Class 6 and unimproved organic soils will be avoided for manure application.

Manitoba Agriculture and Resource Development staff recalculated the land requirements assuming that all of the cattle are off-site for the summer (see Section 13). Gall Family Farm Ltd requires approximately 637 acres of suitable land for manure application based on this assumption. They have demonstrated that they have access to 991 acres of suitable land for manure application.

Appendix B

Agriculture and Resource Development

Water Science and Watershed Management Branch

Staff in the Water Science and Watershed Management Branch have reviewed the site assessment for the Gall Family Farm Ltd proposal in the RM of Grahamdale and have the following comments:

- Nutrient management that avoids excess loss of nutrients to surface waters is 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 field store and then broadcast the solid manure generated during the winter period. When manure is broadcast, immediate incorporation reduces losses of nitrogen via ammonia-volatilization and reduces the risk of N and P losses in runoff to surface waters. When incorporation is not possible (e.g. application to established perennial forage such as alfalfa), application timing can minimize runoff risk by avoiding periods when runoff risk is high. For example, broadcast manure between the first and second cuts of alfalfa, avoiding application when heavy rains are forecast or when soils are saturated or frozen and during the last few weeks before the soil freezes in fall.
- For most crops, manure contains an excess of phosphorus (P) compared to nitrogen (N) and as a result, application at N-based rates causes a buildup of soil P. Practices which reduce N losses from the manure improve the N:P ratio in the manure and help slow P buildup when manure is applied at N-based rates. Application of liquid manure with injection will reduce N losses compared to broadcast methods and is encouraged whenever possible.
- The proponent has acknowledged the setback areas for all water features have been observed and excluded from land base calculations. Setbacks should be clearly communicated to and observed by those involved in manure application to minimize the risk of nutrients entering surface and groundwater.
- 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 further build-up in soils. Consequently, sufficient land base must be available such that manure can be applied at no more than 1 times crop P removal rates (P balance). For long-term planning purposes, the proponent needs to have sufficient land available to ensure that manure can be applied at 1 times crop P removal. The proponent acknowledges that 1,032 acres may be required for the long-term environmental sustainability of the operation. The proponent has identified 991 acres for manure application. Application to meet crop N requirements is estimated to use 637 acres. A total of 1,089 acres is estimated to achieve P balance with current crop choices and yield potential.
- As phosphorus levels build up in soils, the concentration of phosphorus in runoff to surface waters increases. It is important to rotate manure application across all spread fields and whenever possible focus manure applications on fields with low Olsen-P (Bi Carb) soil test levels so as to prevent excessive P buildup when applying manure at rates above P balance (P removal by harvested crops).

- The Draft Report is proposing a new production well on the property at NE or NW of section 33-26-8W. The provincial water well database contains information for two wells present on the proposed property. The database indicates that there are wells present within the spread field locations. If there are unused water wells on the site or spread fields these shall be properly sealed. A sealed well report must be filed with the Groundwater Management Section of Agriculture and Resource Development for each well sealed. Information on well sealing and the sealed well report are available from Agriculture and Resource Development (204-945-6959) or: https://www.gov.mb.ca/sd/water/groundwater/wells_groundwater/index.html. All but the most basic wells should be sealed by a well drilling professional. A list of currently licensed well drilling professionals can also be accessed from the above web page.
- For a proposed new well, the Well Standards Regulation under The Groundwater and Water Well Act (<https://web2.gov.mb.ca/laws/statutes/ccsm/g110e.php>) should be consulted. The regulation requires a minimum 100 metre separation distance between a well and confined livestock areas or manure storage facilities. During manure spreading the set back distances to all groundwater features as prescribed under the Environment Act Livestock Manure and Mortalities Management Regulation should be considered as a minimum distance.

Appendix C

Department Responses to Public Comments

Conservation and Climate has the following response to the public comments:

- **Mortality Management**
 - the only allowable methods of mortality disposal for livestock operations are by burial, incineration, composting or rendering. A livestock operation the size of this proposed operation cannot bury mortalities (Section 15 of LMMMR).

- **Manure Management and Runoff**
 - a Manure Management Plan must be registered annually to outline where manure will be spread and the rate of application on spread fields (Section 13 of LMMMR).
 - solid manure may be stored as field storage. A person who stores solid manure as field storage shall locate the livestock manure at least 100 m from any surface watercourse, sinkhole, spring or well and store the livestock manure in a manner that does not cause pollution of surface water, groundwater or soil (Section 7 of LMMMR).
 - any manure that is stored, or used is not to be discharged or released into surface water (Section 11 of LMMMR).
 - manure applications to land cannot cause pollution of surface water, groundwater or soil or escape the boundary of the agricultural operation (Section 12 of LMMMR).
 - Please note that Manitoba Conservation and Climate will follow-up on specific complaints of non-compliance with the Regulation.

- **Drainage and Water Rights Licensing Branch**
 - There is little evidence of newly constructed or cleaned out drains with the exception of one line segment in NE 33-26-8W that appears on the attached 2014 imagery but has been cleaned out. There are several drains that move across the land locations indicated; however, they are all visible in 2014 imagery. Staff can conduct a more thorough inspection of the sites in question in the spring as the snow may be hiding other features.
 - There is a main drain/creek that runs through the sections 32 & 33-26-8W and 16&17-27-8W. It is complete with water control structures, a berm, dyke system and extends through the wetland areas to a small waterbody known as Reed lake; therefore, it is believed to be either provincially or municipally constructed. This drain is very nearby the intensive existing livestock operation so I understand the concern from the local residents on water quality; however, as indicated on the map the newer proposed area seemed less affected by the 2011 high water levels than where it is currently located. That suitability of the land; however, that would not be an endorsement of the proposed plan rather an observation.
 - Please note that Conservation and Climate will follow-up on specific complaints of non-compliance.

**Appendix D -
Proponent Responses to Public Comments**



12 Aviation Boulevard
St. Andrews MB R1A 3N5
Canada
T: 204-334-8846
dgh@dghengineering.com

February 3, 2020

Transmitted by email: trc@gov.mb.ca

Attention: Don Malinowski
Livestock Technical Review Co-ordination Unit
604 - 800 Portage Avenue
Winnipeg, Manitoba R3G 0N4
Phone: 204-945-8353

Dear Mr. Malinowski:

Re: Gall Family Farm – Site Relocation

Introduction

The following is in response to concerns raised by the Metner family concerning the proposed cow-calf operation by Gall Family Farm Inc. The concerns were provided in three letters from: David and Marlene Metner; Ryan and Andrea Metner; and Victoria Metner. All Metner family members reside at one yard site to the north of the proposed beef operation. They will be the closest neighbours.

The concerns raised by the Metner family include: runoff, manure disposal; the presence of natural springs; mortality disposal; and noise and odour.

This document has been prepared by DGH Engineering Ltd. on behalf of the Gall Family Farm, and addresses the above technical issues raised by the Metner family. A separate personal response to the Metner family by the Gall family is attached to this document for reference.

Clarification of Operation Size and Nature

The Gall Family Farm presently consists of a cow-calf operation with approximately 350 cows and backgrounder animals.

The Conditional Use application identifies a longer-term capacity 550 cows and 430 backgrounders which is approximately 60 percent larger than the existing operation. The reason for this is to permit the Galls the flexibility to expand the operation over time to remain an economically viable family farm. All family farms in Manitoba have grown in size over time to remain viable. The Gall family is proposing this size in recognition of this economic reality. The timeline to achieve this growth is indefinite at this time.

The nature and size of the proposed operation is consistent with existing farms in the area. Within a radius of two miles there are seven other cow-calf beef operations ranging in size from approximately 150 to 500 cows; or a total of approximately 2200 cows. Certainly, the size and nature of the proposed livestock operation is totally consistent with neighbouring land use.

The management of the Gall cow-calf operation will be consistent with not only the seven other operations within the immediate area, but with the approximately 4500 other cow-calf operations in Manitoba. Gall Family Farms intends to follow or exceed best management practices for cow-calf operations.

The proposed cow-calf operation can be sub-divided to the following:

- Summer pasture – the cattle graze on various pastures from June 1 to November 1. These pastures are approximately 35 miles from the yard site. Manure is naturally distributed during grazing and the cattle are not permitted access to natural watercourses.
- Seasonal feeding areas – these are areas where the cow herd is provided supplemental feed in fall, winter and spring. In the Gall operation, three fields, approximately 50 acres each, will be used for the main cow herd and will be rotated every three to five years or as required. In this way a build-up of phosphorus is avoided as the crops (alfalfa, grass, oats, barley and peas) have time to utilize the nutrients. The yard site will also contain four fenced paddocks (also seasonal feeding areas) varying in size from 5.7 to 16.5 acres. These paddocks will be used from March 1 to June 1 for calving and post calving. Because of the low animal density and short duration, it is anticipated that the manure nutrients in these paddocks will be utilized by the grass cover. Note the paddocks will be harrowed to disburse the manure and promote forage growth. The paddocks do not drain directly into any watercourse and are isolated from the springs located on NE 33-26-8W.

A small (4 acre) area that will be used for overwintering the backgrounder cattle is also a seasonal feeding area. This area will have relatively high animal density therefore the complete area will be graded to drain and store up to three inches of runoff in a settling and retention pond.

This backgrounder pen area differs significantly from a conventional feedlot in that it is not stocked with animals year-round. The backgrounder pen is expected to be stocked from October to March.

Water Quality

Surface and groundwater protection is provided through environmental regulations, monitoring and enforcement as follows:

- Our professional agronomist, Agra-Gold Consulting has confirmed that Gall Family Farms has sufficient land base to safely recycle manure nutrients. The Provincial Technical Review has verified this;
- Manure application will be in accordance with a government approved **annual** manure management plan. All manure application will be applied at an agronomic rate and in locations that meet the requirements of the Livestock Manure & Mortalities Regulation. Manured fields are soil tested annually and the test results are reviewed by Manitoba Conservation and Climate. Because the beef herd will be on pasture during the summer months at a remote location some 35 miles away from June till the end of September manure volume from the operation will be reduced considerably.
- The seasonal feeding area for the main cow herd will be managed as discussed earlier by rotating every three to five years; and
- The cattle will not be allowed access to the natural springs on site and runoff will not be allowed to enter the springs.

Mortalities

All mortalities will be disposed of through composting. Straw and manure will be utilized to bury the carcasses to control odour and prevent access to the carcasses by predators. Composting is a proven technology that when properly managed provides odour free and environmentally safe disposal of livestock mortalities.

Noise and Odour

Given the nature of both the proposed operation and the significant number (seven) of similar operations in the immediate area, noise and odour should not be an issue. Some odour and noise is normal with every cow-calf operation. The size of the proposed cow-calf operation (550 cows) is consistent with other operations in the area. During the summer months when neighbours spend more time outdoors, there will be very few livestock at the farm yard location.

Summary

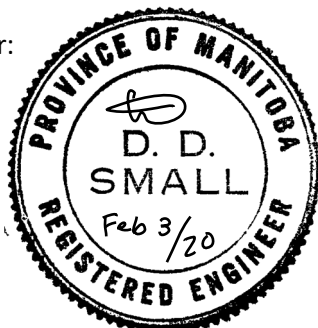
The proposed cow-calf operation will be a moderate increase in size from the present Gall operation. The proposed size (550 cows) is consistent with seven other cow-calf operations within a two-mile radius. The land use for this proposed operation is therefore completely compatible with existing land use.

The environmental aspects of this proposed operation have been reviewed by the Provincial Technical Review Committee as well as DGH Engineering. The operation will meet or exceed all Provincial requirements as well as the standards of practice of approximately 4500 other cow-calf operations in Manitoba.

Yours truly,

DGH ENGINEERING LTD.

Per:



MB PERMIT TO PRACTICE No. 540

Doug Small, P.Eng.

DS/kl

To the Metner family

January 13, 2020

Two days ago we received the multiple letters your family wrote to the province of Manitoba regarding us and the relocation of our farm. Never in any of our lives have we heard anyone talk about anyone in our family the way you have, and I am shocked by the viciousness and obvious resentment behind the comments. I could not sleep the entire night after reading it because we had no indication that that was the way your entire family viewed us. Some of the concerns you addressed (groundwater contamination and Watchorn Beach) are warranted, but the way you addressed them and portray us to complete strangers was extremely hurtful. My ancestors came to this area because of the clean drinking water and I would never do anything to jeopardize that.

Watchorn Beach has also been a very large concern as my children spend a lot of time there. Every meeting we have ever had about our own properties and what is going to happen to it, we have also specifically included our concerns for that park as we feel it will be greatly affected by this channel.

I have taken many courses and spent two years in university obtaining knowledge of livestock and the effects they have on the environment. I have completed two separate provincial environmental farm plans and am currently working on my third. Through these farm plans I have done many things to try and limit the impact our current farm has on the surrounding area.

Your family has never once brought any of the multiple concerns you have with us about our cattle across the road from you, and if I had known the severity of those concerns I would have addressed them. Yes, I admit the fence along the road isn't the greatest and it was in our plans before these letters to replace it with a new one. I would like to point out that replacing that half mile is going to cost over \$10000. I would also like to point out that of the times you have called me about cattle being out they were not always our animals. Our family does not keep any animals (including bulls) on our farm that would attack anyone and I had no idea that you feared walking around your yard because of them. I would also like to point out that when every time I have gone to repair the fences I have been met by your dogs growling and barking at us to the point I couldn't let my son out of the truck and no longer bring any of my children there because I don't trust them.

Another thing we would like to address is the spot we chose. I personally approached 5 other land owners in the area multiple times in an attempt to find a place to move to. The governments solution was for us to purchase an existing farmyard that would be grandfathered in terms of facilities and regulations regarding our animals and their manure. We would not have to follow government guidelines regarding our animals and would be free to do what we want. Our view is that if we are being forced to relocate, our facilities are going to be fully up to all government guidelines and regulations regarding confined livestock. When complete, our new farm will be one of the most environmentally friendly livestock facilities in the province. We have spent a lot of our own money hiring experienced engineers to design this so that all government guidelines are followed. Had we chose to leave this area, our land around you would probably been sold and turned into annual cropland that would be sprayed with chemicals multiple times a year. In my opinion chemicals can cause more harm to human health than any cow ever could.

There are many more points I would like to address but at this point I am totally exhausted. The mental and physical stress this whole thing has brought on our entire family is something that I can't even begin to try and explain to people who have never gone through it. My parents are going to see absolutely everything they have worked incredibly hard to build taken and completely wiped off the face of this earth. My wife and children have seen a side of me that I am ashamed of and hope they never see again. The last thing I'd like to point out that upon hearing of David's termination as building inspector I personally contacted three different councilors to explain how he helped us from getting into a bad situation with Visionary Homes and saved us from getting into a situation that would have cost us a lot of money and caused a lot more undue stress. I had many conversations with Dave and Marlene and valued their years of building experience as I have none. Not once were any of the concerns you presented to the province mentioned and never in the entire time of knowing your family have we ever felt the anger and resentment that has been spelled out in these letters. I think that is what really hurts the most.

Your concerns involving our manure and the other environmental concerns will be addressed and answered by qualified and highly experienced engineers. This letter was more to address the personal aspect, and if this is way you truly feel about our entire family it deeply saddens us. One of the main reasons we wanted to stay here was because of the people that live here and I have never felt there wasn't a neighbor around us I couldn't call or ask for help if needed and I thought that everyone felt the same about us. Everyone has their differences and quirks and I hope that if we are allowed to proceed with our new location we would be able to still be good neighbors. The days of 30 to 40 cow farms are sadly over and I in no way have any intention of becoming a "factory farm." I enjoy raising cattle and take pride in my animals and think this is the best place in the world to raise my family and hope to leave my children a farm that is beautiful and environmentally sustainable.

David, Mandy, William, Cole, Sara Gall