



TECHNICAL REVIEW COMMITTEE

**A TECHNICAL REVIEW REPORT
PREPARED FOR THE**

Rural Municipality of Hanover

**SHELDON KLASSEN
(EAGLEBROOK FARMS)**

**NW $\frac{1}{4}$ 11-5-6 EPM and
S $\frac{1}{2}$ of Section 14-5-6 EPM
TRC 12-112**

August 12, 2025

A. INTRODUCTION – THE TEAM

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

Agriculture (AGR)

- Agri-Resource Engineer
- Business Development Specialists
- Veterinarians
- Agri-Ecosystem Specialists

Natural Resources and Indigenous Futures (NRIF)

- Crown Lands Manager
- Fish Habitat Specialist
- Habitat Mitigation Biologist

Environment and Climate Change (ECC)

- Environmental Engineer
- Environment Officer
- Water Rights Licensing Technologist
- Land-Water Specialist
- Groundwater Specialist

Manitoba Transportation and Infrastructure (MTI)

- Senior Development Review Technologist
- Senior Flood Protection Planning Officer

Municipal and Northern Relations (MNR)

- Community Planners

And any other specialist or department that may have an interest or is consulted during the TRC process.

THE TECHNICAL REVIEW COMMITTEE (TRC) REPORT

Purpose of TRC Reports

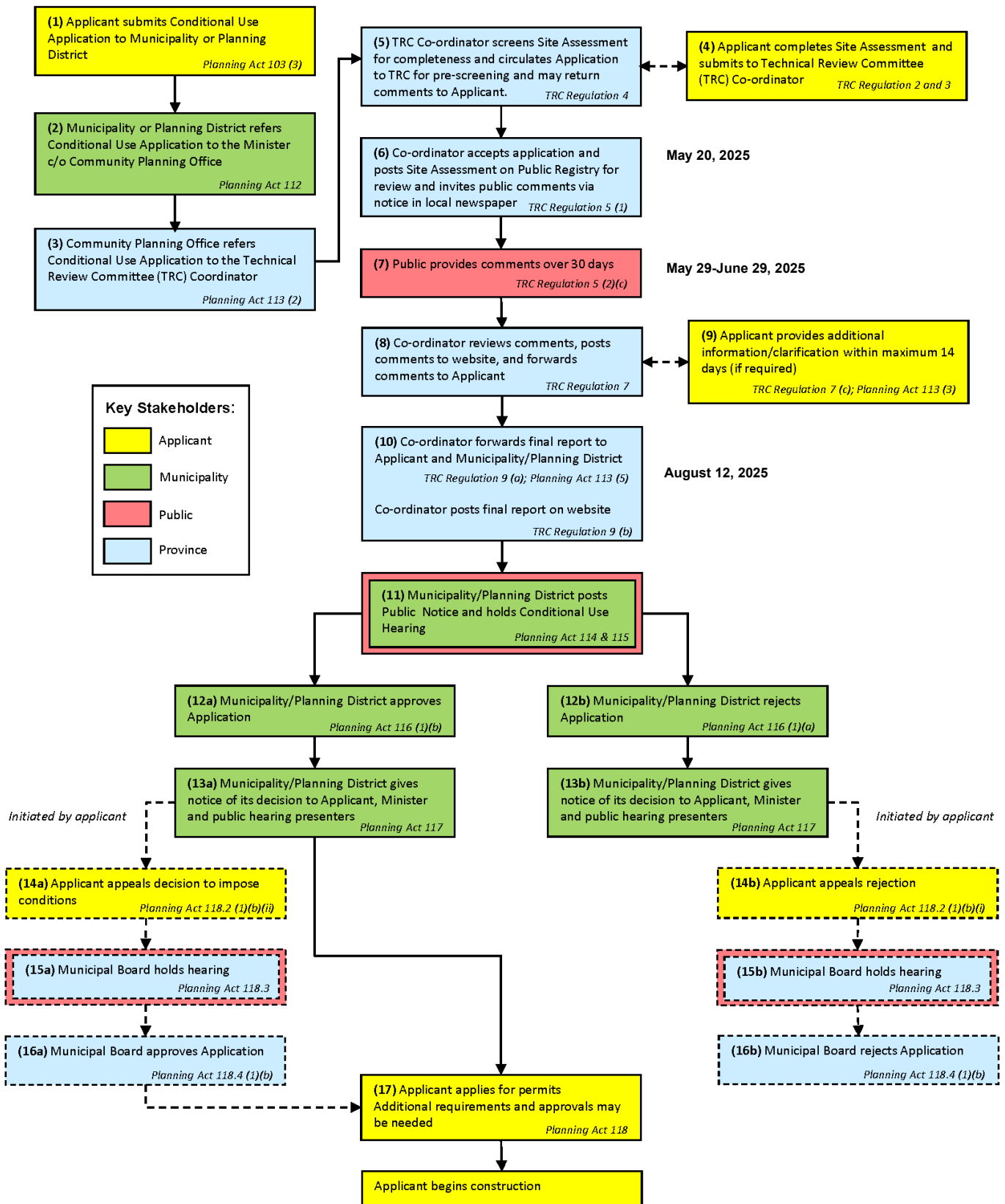
To provide objective, credible, technically-based assessments that:

- a) Enable municipal councils or planning district boards to make informed decisions regarding Conditional Use applications;
- b) Create common stakeholder understanding regarding livestock proposals, their 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 councils/boards and proponents; and
- e) Represent 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, measure and safeguards.

Should a municipal council or planning district board provide conditional approval of a 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. As of November 1, 2019, a proponent may appeal a council/board's rejection of their application or appeal a condition imposed on the approval of a council/board to the Municipal Board.

Livestock Technical Review Process

(June 19, 2024)



B. DESCRIPTION OF PROPOSED LIVESTOCK OPERATION

Further information may be found at https://www.gov.mb.ca/mr/livestock/public_registries.html

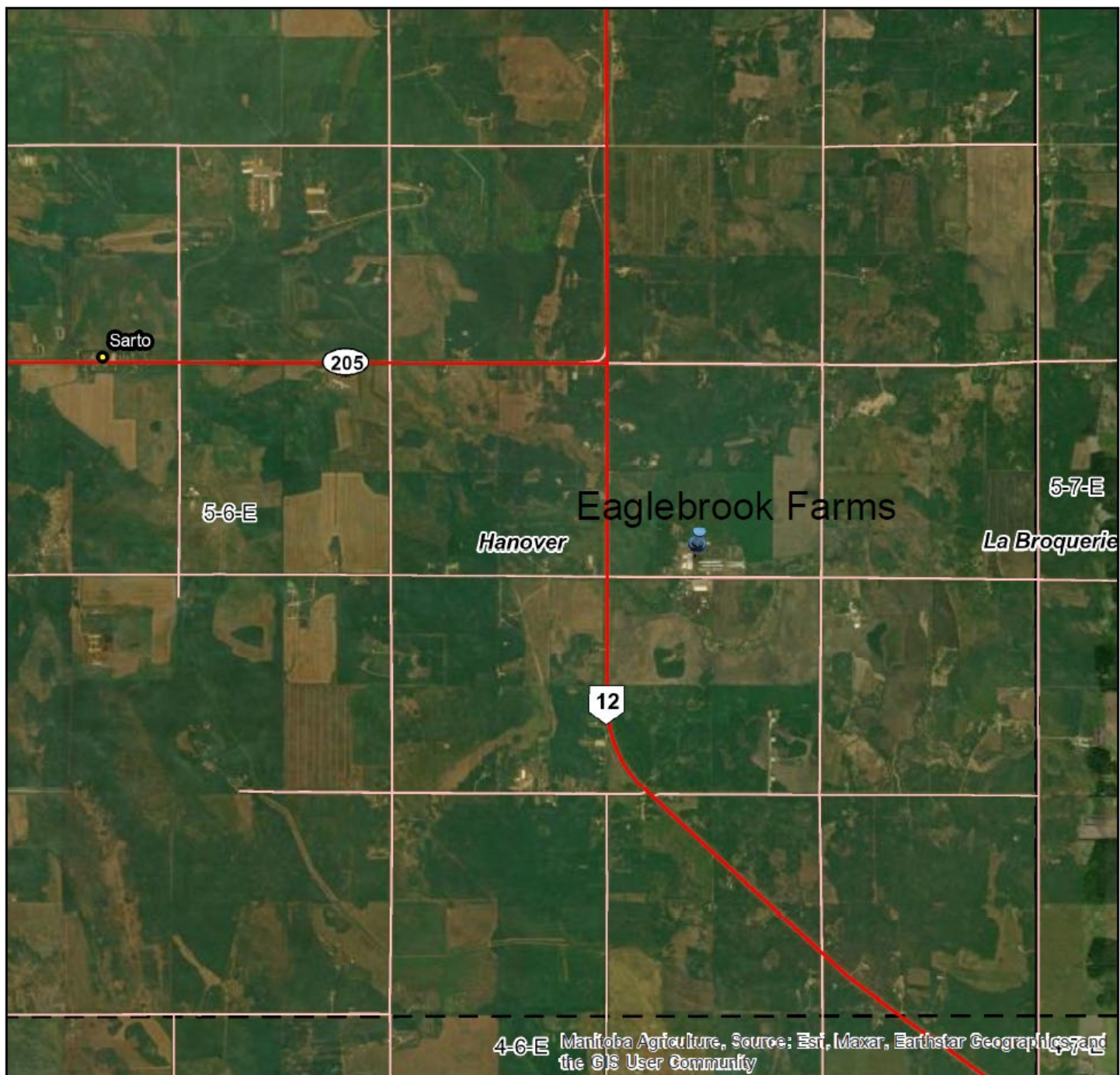
Applicant: Sheldon Klassen (Eaglebrook Farms)

Site Location: NW ¼ 11-5-6 EPM; S ½ of Section 14-5-6 EPM (Refer to map on p 4)

Proposal: The applicant seeks to expand an existing dairy operation. The proposal involves increasing the number of Mature cows (lactating and dry) including associated livestock from 400 to 800 animals, representing an increase from 800 to 1600 Animal Units.

This will involve the following:

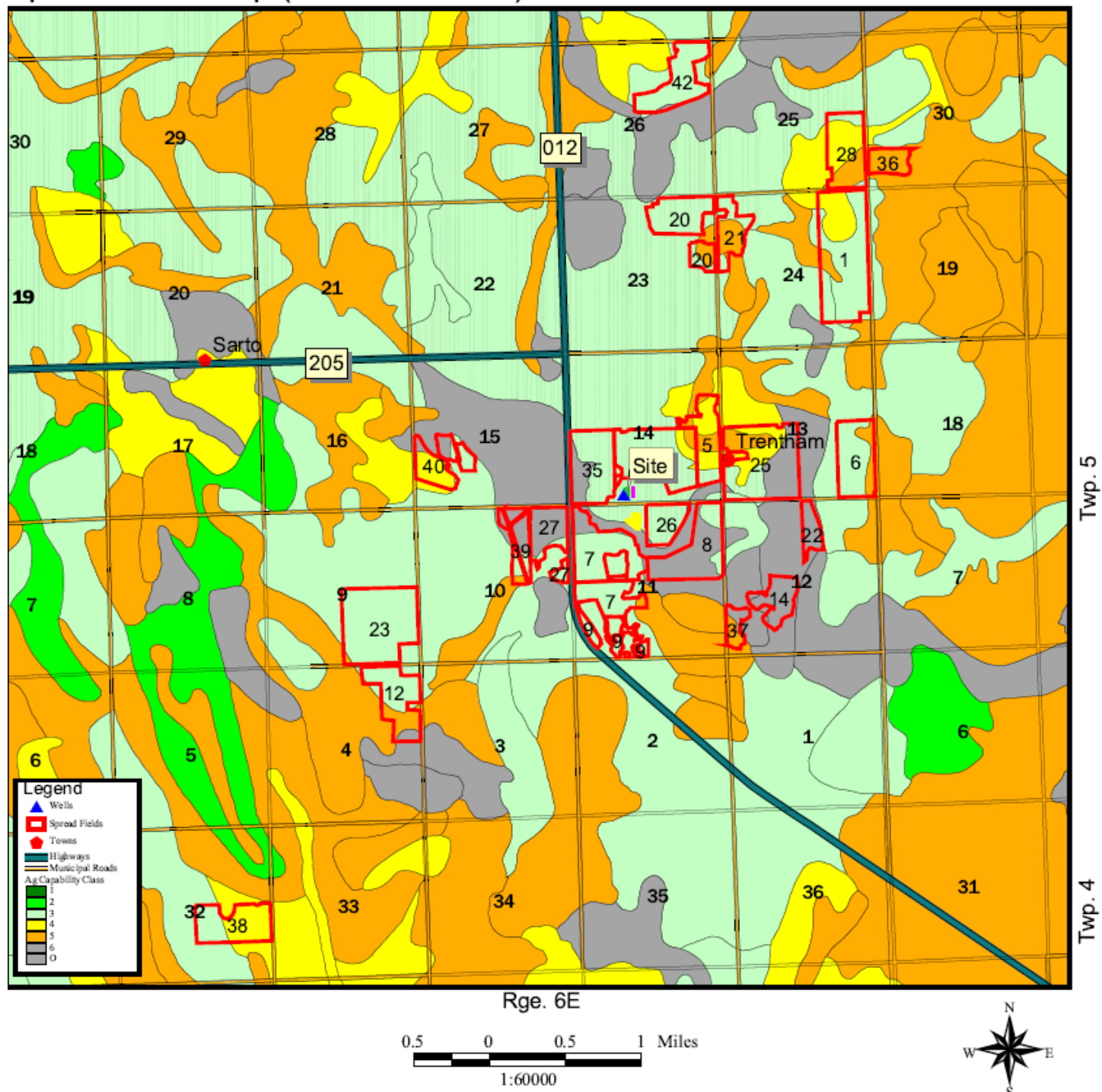
- Construction of one new free stall dairy barn; continued use of existing free stall dairy barn and holding area (dry lot) as is;
- Expansion of existing earthen manure storage and use of field manure storage;
- Estimated daily water use of 65,600 imperial gallons from an existing well;
- Composting of mortalities; and
- Truck haul routes as shown in map below.



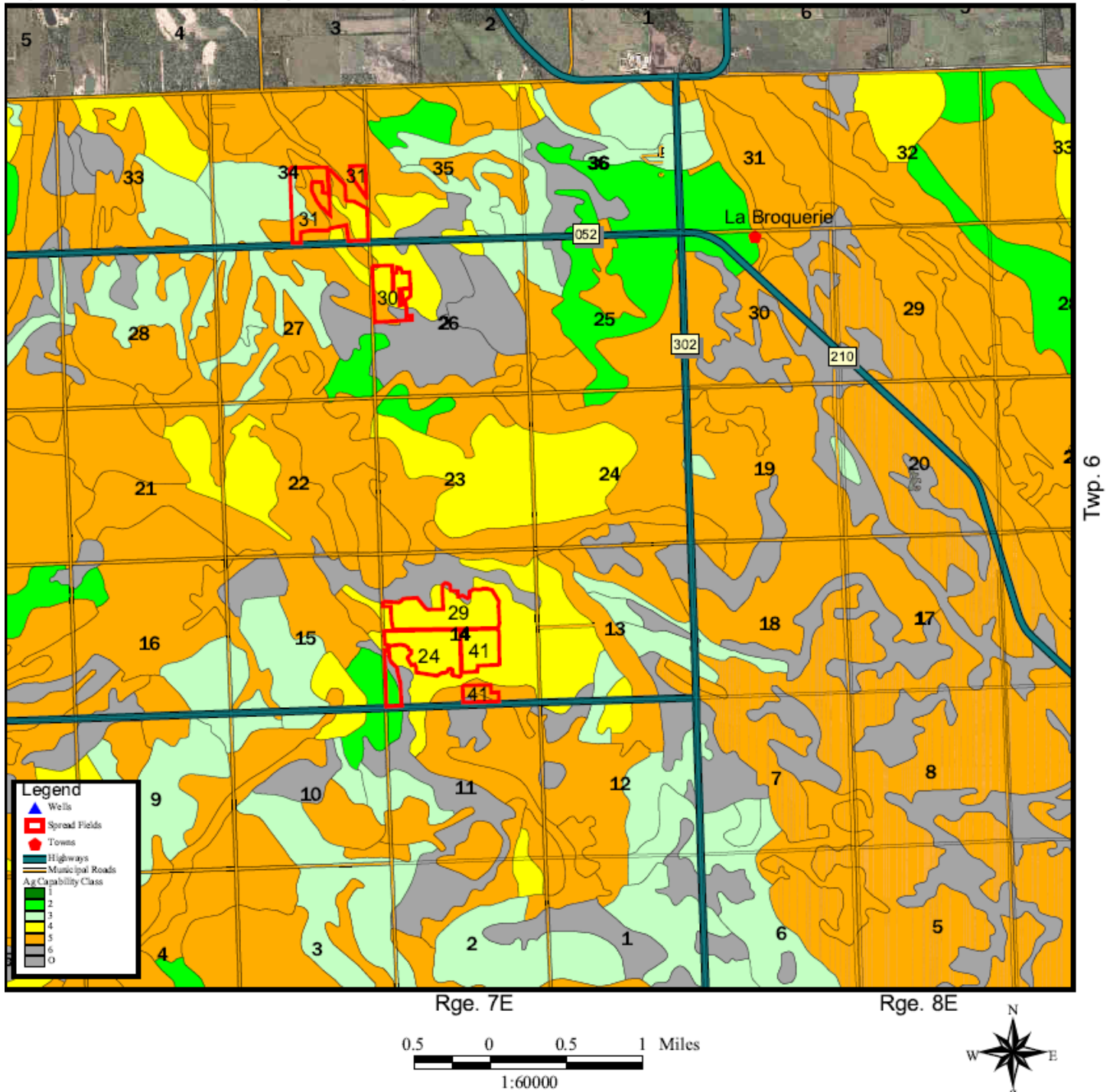
Location Map



Eaglebrook Farms Spread Fields Map (Hanover Fields)

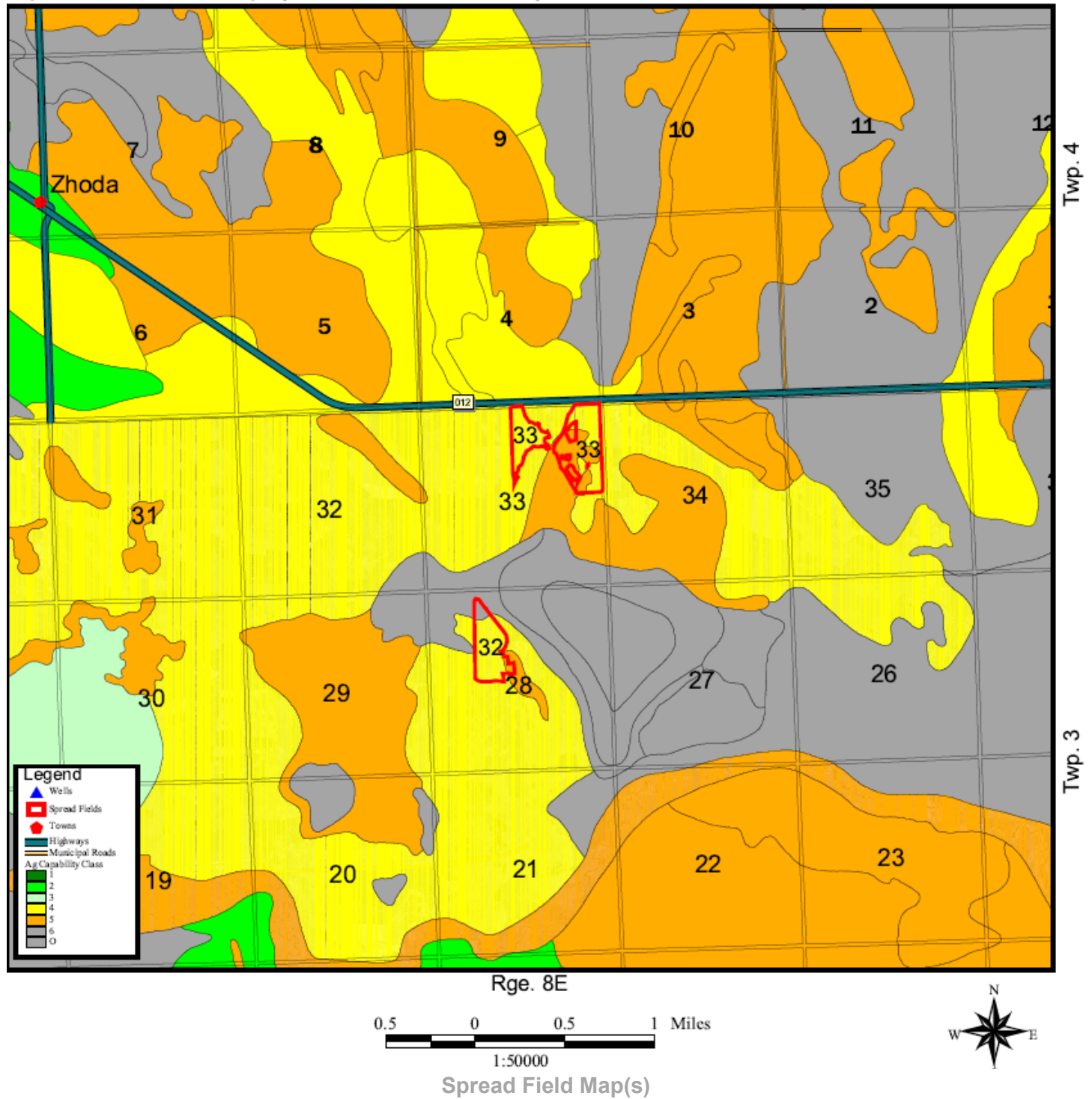


Eaglebrook Farms Spread Fields Map (La Broquerie Fields)



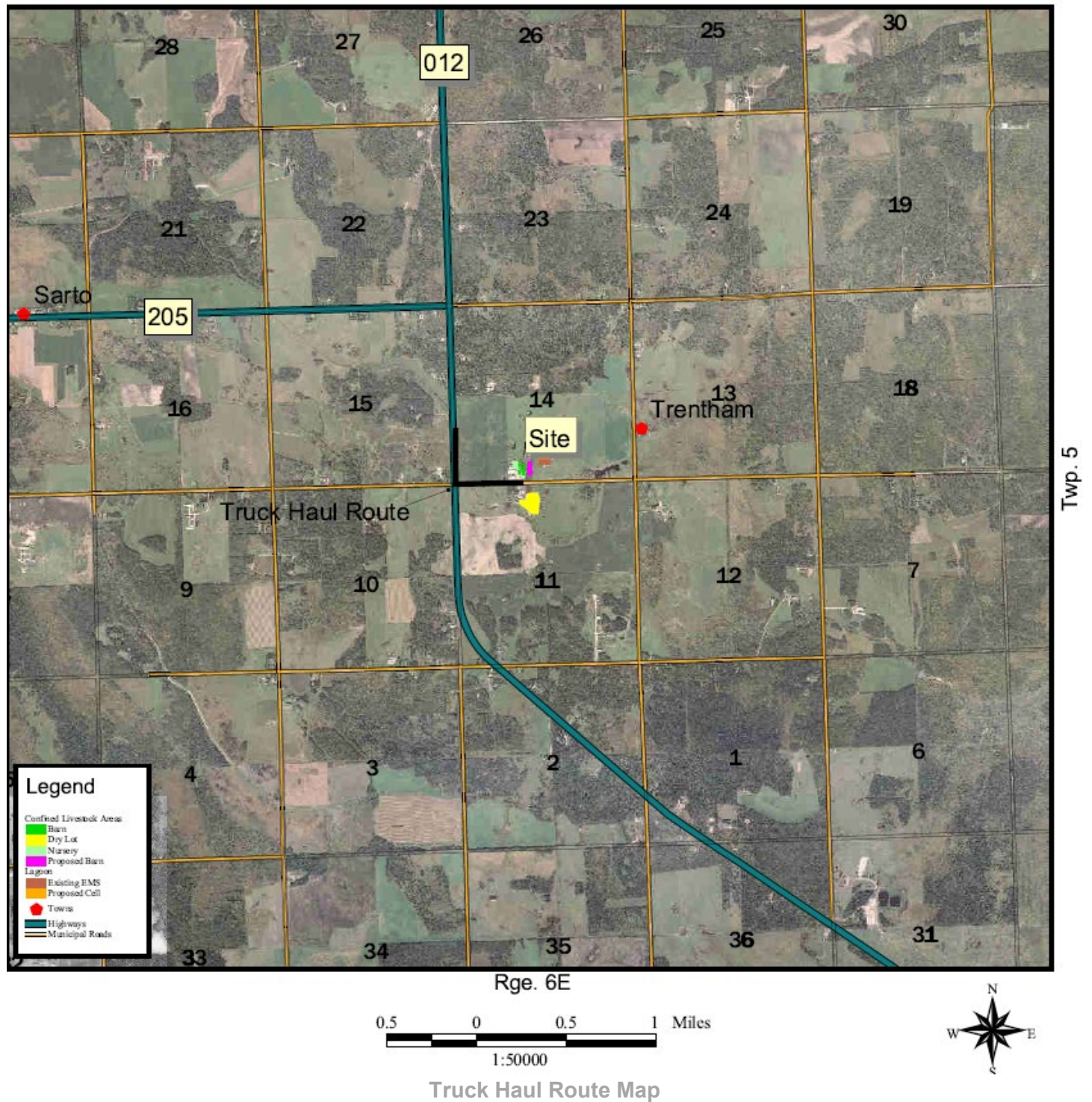
Eaglebrook Farms

Spread Fields Map (Stuartburn Fields)



Eaglebrook Farms

Truck Haul Routes and Access Point



C. SITE ASSESSMENT OVERVIEW

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
1	Description of Operation and Nature of Project	<p>The Planning Act requires that that an application to approve a conditional use for a livestock operation involving 300 or more Animal Units must be referred to the Livestock Technical Review Committee (TRC) for review.</p> <p>The RM of Hanover Development Plan By-law No. 2417-18 states that new or expanding livestock operations 400 Animal Units or greater in size shall be listed as a conditional use in the Zoning By-law and will require a technical review.</p> <p>Eaglebrook Farms' (TRC 12-112) application is for an expanding dairy operation of more than 400 Animal Units. As such, it has been referred to the TRC for review.</p> <p>The Technical Review Committee Regulation 119/2011 requires an applicant to submit a completed site assessment.</p> <p>The TRC has received and accepted for review a complete site assessment from Eaglebrook Farms, including all information necessary to review the application.</p>	MNR
2	Type and Size of Operation	Eaglebrook Farms is seeking Conditional Use approval from the RM of Hanover to expand their dairy operation to 800 mature cows, including associated livestock. The total animal units would be 1600 AU.	AGR
3	Animal Confinement Facilities	A new, 60,000 sf free stall dairy barn is proposed. There is an existing 60,000 sf free stall dairy barn that will remain unchanged. There is also a 260,000 sf dry lot that is existing.	MNR
4	Confined Livestock Areas	<p>The applicant will use an existing confined livestock area (CLA). Under the Livestock Manure and Mortalities Management Regulation, the applicant must:</p> <ul style="list-style-type: none"> • Ensure the CLA does not pollute surface water, a surface watercourse, groundwater, or soil. • Remove manure at least once per year and store or land-apply 	ECC
5	Project Sites Unsuitable for Development	The proposed new free stall barn is not located in Nutrient Management Zone N4 or a Nutrient Buffer Zone. Existing structures and confined livestock areas which are not altered (used as is) are not part of this review.	ECC
6	<p>Water Source: Existing Well</p> <p>Water Requirements of 65,600 imperial gallons per day</p>	<p>Based on the water consumption information provided, this proponent is required to apply for a Water Rights Licence under The Water Rights Act. An application can be submitted via our online portal https://web22.gov.mb.ca/Sso/Account/LogOn</p>	ECC

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
7	Development Plan	<p>The Planning Act requires that development plans include a livestock operation policy that guides zoning by-laws dealing with livestock operations.</p> <p>The Planning Act requires that municipalities issue a development permit before any development takes place on a site. All development must comply with the Zoning By-law and Development Plan. Any proposed development that does not comply with required separation distances or setbacks must obtain Council approval following public hearing to vary those requirements.</p> <p>Designation The site of the proposed livestock operation, located in S ½ 14-5-6 EPM and NW ¼ 11-5-6 EPM in the RM of Hanover, is designated Agriculture 1 Area (Hanover Development Plan By-law No. 2417-18). The proposal complies with Development Policies 3.4.3 (Livestock Policies), which state that new or expanding livestock operations of 400 animal units or greater will be listed as a conditional use in the Zoning By-Law and will require a Conditional Use Permit.</p>	MNR
8	Zoning By-Law	<p>The site of the proposed operation is zoned “AG” Agriculture General Zone (Hanover Zoning By-law No. 2418-18) with a minimum site area requirement of 80 acres and a minimum site width requirement of 600 feet.</p> <p>The proposed operation complies with the Zoning By-law in that no variance orders for separation distances or site area are required.</p> <p>A variance may be required (if one has not already been obtained) for the front-yard setback from buildings housing livestock to the front property line. The minimum setback is 200 feet, while the current distance is approximately 160 feet.</p>	MNR
9	Separation Distances	No variances required. All required separation distances from designated areas and neighboring residences to manure storage and animal confinement facilities appear to be met.	MNR

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
10	Abandoned Wells	<p>The proposal identifies that the water use for the proposed livestock operation is from the existing well located at SW ¼ 14-5-6 EPM; and the proponent is not aware of any abandoned wells present on the project site or spread fields. If any abandoned wells are found, they should be properly sealed if not in use and a sealed well report must be filed with Manitoba Environment and Climate Change, Groundwater Management Section. For information on well sealing and submission of reports, contact Manitoba Environment and Climate Change at (204) 945-6959 or: https://www.gov.mb.ca/water/groundwater/wells_groundwater/index.html.</p> <p>A well drilling professional should seal all but the most basic wells. A list of currently licensed well drilling professionals can also be accessed from the above web page.</p> <p>The provincial wells database indicates that several wells are located within the Manaure spread field. The accuracy of the well location and its status in the database is not known or reported wrong. Most of these wells are plotting within a section. Therefore, it is expected from the proponent to make an attempt to identify these wells. If the proponent confirm that a reasonable effort has been made and no well(s) was located on land that has been identified for spreading, then no further actions are required.</p> <p>Under the Livestock Manure and Mortalities Management Regulation (LMMMR), a minimum 20-metre setback from any well, spring or sinkhole must be maintained during manure spreading, or 15-metre if a permanent vegetative buffer is in place.</p>	ECC
11	Water Control Works	On behalf of the Drainage & Water Rights Licencing Branch – Drainage Section, there are no concerns and no requirement for an authorization under The Water Rights Act.	ECC
12	<p>Manure Type and Storage:</p> <p>Solid and liquid manure – field storage and earthen manure storage facility</p>	<p>The applicant will store solid manure as field storage. Under the Livestock Manure and Mortalities Management Regulation, the applicant must:</p> <ul style="list-style-type: none"> • Locate the manure at least 100 m from any surface watercourse, sinkhole, spring, or well. • Ensure the manure does not pollute surface water, groundwater, or soil. • Land-apply the stored manure the following year. <p>The applicant will modify or expand an existing manure storage. Under the Livestock Manure and Mortalities Management Regulation, the applicant must obtain a permit from Environment and Climate Change to modify or expand the storage. Once in operation the applicant must:</p> <ul style="list-style-type: none"> • Ensure there is sufficient capacity to store all manure through the winter. • Maintain the structural integrity of the storage. • Operate the storage so that it does not pollute surface water, ground water or soil. 	ECC

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
13	Mortalities disposal methods identified: Composting	The applicant will compost mortalities. Under the Livestock Manure and Mortalities Management Regulation, the applicant must: <ul style="list-style-type: none"> • Ensure the composting does not pollute surface water, groundwater, or soil. • Locate the composting site at least 100 m from any surface watercourse, well, or the operation's boundaries. • Ensure the composting facilities and process are acceptable to the director. 	ECC
14	Setback Distances from Manure, Livestock, and Mortalities to Water and Operation Boundaries	The existing confined livestock area does not meet the current regulatory setback distances. However, under the Livestock Manure and Mortalities Management Regulation (M.R. 42/98), confined livestock areas that were constructed prior to the regulation's amendments may continue to operate. In accordance with Section 16(5) of the regulation, the operator is responsible for ensuring that the confined livestock area does not cause pollution of surface water, surface watercourses, groundwater, or soil.	ECC
15	Building in Designated Flood Areas	The property is not within the Designated Flood Area.	MTI
16	Odour control measures (project site)	Eaglebrook Farms has indicated that shelterbelts will be planted. 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.	AGR
		The Applicant has indicated that a shelterbelt is proposed for the expansion. Although separation distances are being met, the proposed expansion will put the animal units at the upper limit of the 800-1600 AU category for setbacks. Council may consider ensuring that the intended odour control measures are implemented.	MNR
17	Land Available for Manure Application	The estimated land requirement for Eaglebrook Farms is 2210 acres for the phosphorus or 1576 acres for the nitrogen, whichever is higher. Eaglebrook Farms has satisfied the land requirement by demonstrating that they have access to 2218 suitable acres. Additional details can be found in the appendix.	AGR

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
		<p>The proponent's proposed spread fields are located within the Municipality of Hanover, La Broquerie, and Stuartburn.</p> <p>Spread field locations in Hanover are designated Agriculture 1 and Agriculture 2 Policy Area and comply with the respective Livestock Policies.</p> <p>Spread field locations in La Broquerie are designated Rural 2 Policy Area and comply with the respective Livestock Policies, though, it should be noted that there are all located close to designated rural residential and principal centre policy areas. There are no policies that restrict manure field application as they relate to designated areas.</p> <p>Spread field locations in Stuartburn are designated Agriculture Policy Area and comply with the respective Livestock Policies.</p>	MNR
18	Setbacks for Manure Application	Under the Livestock Manure and Mortalities Management Regulation, manure spreading must meet setback distances to all surface watercourse and groundwater features	ECC
19	Manure Transportation and Application	<p>Please be advised that any structures placed within the controlled area of a Provincial Trunk Highway (PTH) or Provincial Road (PR) (125 ft from the edge of the right-of way) requires a permit from our office. For permit information, please email accessmgmt@gov.mb.ca or call 204-583-2433. Permit information can also be found at https://forms.gov.mb.ca/highway-permits-application/index.html</p> <p>The placements of temporary drag lines or any other temporary machinery/equipment for manure application within the right-of-way of PTH 12, PR 205 or any provincial trunk highway (PTH) or provincial road (PR) requires permission from our regional office in Steinbach. Please contact the Regional Planning Technologist, Joelle Coulombe at 204-346-2389 or Joelle.Coulombe@gov.mb.ca. 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 12, PR 205 or any PTH or PR (125 feet from the edge of the right-of-way).</p>	MTI
		<p>Under the Livestock Manure and Mortalities Management Regulation, the applicant must:</p> <ul style="list-style-type: none"> Operate with an annual manure management plan which includes: <ul style="list-style-type: none"> Manure type, volume, and nutrient values Spread field location and soil class Soil tests showing nitrogen and phosphorus levels Crops to be grown Manure application rate Ensure manure does not pollute groundwater, soil or escape the operation's boundaries. <p>Follow requirements for the land application of manure, including nitrogen limits and phosphorus thresholds.</p>	ECC
20	Manure Application on Lands Subject to Frequent Flooding or Inundation	The applicant has indicated that no spread fields are located within the Red River Valley Special Management Area or any other regularly inundated area.	ECC

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
21	Projected Truck Haul Routes and Access Points	The proposed truck haul route utilizes an existing municipal road connecting onto PTH 12 and PR 205. We don't anticipate any significant increase in use.	MTI
		<p>The proposed site is accessed by municipal road 26N and is located east of and adjacent to PTH 12. See attached map for truck haul routes.</p> <p>As per Section 116(2) of The Planning Act, municipalities, as a condition of approval, may require proponent to enter into a development agreement regarding the condition and upkeep of local roads used as truck haul routes.</p>	MNR
22	Conservation Data Centre Report	The information provided in the assessment suggest that there will not be any conflicts with species protected under the <i>Endangered Species and Ecosystems Act</i> and/or <i>Species at Risk Act</i> , or designated as rare or uncommon by the Manitoba Conservation Data Centre (MBCDC). This review is based on existing data known to the MBCDC of the Wildlife Branch at the time of the review. These data are dependent on the research and observations of our scientists and reflects our current state of knowledge. An absence of data does not confirm the absence of any rare or endangered species. Many areas of the province have never been thoroughly surveyed, however, and the absence of data in any particular geographic area does not necessarily mean that species or ecological communities of concern are not present. The information should, therefore, not be regarded as a final statement on the occurrence of any species of concern. All future observations of rare or endangered species made by the proponent should be reported to the MBCDC for further review.	NRIF

Provincial Departments: Agriculture (AGR); Environment and Climate Change (ECC); Transportation and Infrastructure (MTI); Municipal and Northern Relations (MNR); Natural Resources and Indigenous Futures (NRIF)

D. PUBLIC COMMENTS AND DISPOSITIONS

Public Comment Summary	
Walery, Nelli, and Willi Brant	Opposed Concerns regarding: <ul style="list-style-type: none"> • High traffic levels and poor road conditions • The proponent's capacity to properly spread manure
Barbara Adel Naherniak	Opposed Concerns regarding: <ul style="list-style-type: none"> • Traffic moving across the Provincial road and the safety concerns this poses • The viability of the expansion due to the current political and economic climate
Gary, Shelley, and Sonya Block	Opposed Concerns Regarding: <ul style="list-style-type: none"> • The odour and lack of a shelterbelt • Water pollution, effects on the water table, and the potential of needing to drill deeper wells • Increased traffic
Danielle Goertzen	Opposed Concerns Regarding: <ul style="list-style-type: none"> • The odour • Water pollution, effects on the water table, and the potential of needing to drill deeper wells • Increased traffic
John Kauenhofen	Concerned Concerns Regarding: <ul style="list-style-type: none"> • Ground water contamination • Increased solid and liquid waste
Maryann and Kelvin Johnson	Concerned Concerns Regarding: <ul style="list-style-type: none"> • The impact on paved and gravel roads • Dust being produced in a neighbourhood with many children • Fast speeds on the truck haul routes that make it hard to stop in case of an emergency

A full copy of the public comments as well as the proponent's response may be viewed on the public registry at: https://www.gov.mb.ca/mr/livestock/public_registries.html

See Appendix B for the proponent's response to the public comments.

E. CONCLUSIONS AND RECOMMENDATIONS

Conclusion

The information contained in the Site Assessment submitted by the proponent generally meets provincial requirements. 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

1. 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
 - i. the applicant,
 - ii. the Minister (c/o the Steinbach Community Planning Office),
 - iii. all adjacent planning districts and municipalities, and
 - iv. 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) publish the notice of hearing in one issue of a newspaper with a general circulation in the planning district or municipality or, when there is no newspaper with a general circulation in the area, post the notice in the office of the planning district or municipality and at least two other public places in the district or municipality; and
 - c) post a copy of the notice of hearing on the affected property in accordance with the Posting Requirements outlined in Section 170 of The Planning Act.
2. Council should specify the type(s) of operation, legal land location, number of animals in each livestock category, total animal units, and expiration date (as per Planning Act section 110(1)) in its Conditional Use Order.
3. 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 Steinbach Community Planning Office), and
 - c) every person who made representation at the hearing.
4. Council is requested to include in their resolution and/or Conditional Use Order notification that, as per Section 118.2(1) of The Planning Act, an applicant may appeal the following decisions of a board or council to the Municipal Board:
 - b) for an application for approval of a conditional use made in respect of a large-scale livestock operation,
 - i. a decision to reject the application,
 - ii. a decision to impose conditions.
5. As per Section 118, no development or expansion of a livestock operation that is the subject of an application under Part 7, Division 2 of The Planning Act may take place until
 - a) the application is approved and the applicant complies, or agrees to comply, with any condition imposed on the approval under this Division; and
 - b) the applicant obtains every approval, including any permit or licence, required under an Act, regulation or by-law in respect of the proposed operation or expansion, and complies with, or agrees to comply with, any condition attached to the approval.

6. Council is welcome to contact Manitoba Environment and Climate Change, 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

1. That any additional measures identified through subsequent provincial licencing or permitting in order to minimize any identified risks to health, safety and the environment be undertaken.
2. That as per Section 118.2(2)(b), an applicant may appeal the following decisions of a board or council to the Municipal Board respecting an application for approval of a conditional use:
 - i. a decision to reject the application,
 - ii. a decision to impose conditions.

F. TECHNICAL REVIEW COMMITTEE MEMBERS

Name	Department	Title Branch	Contact
Holly Ervick-Knote	Municipal and Northern Relations	Senior Planner <i>Community Planning Services Branch</i>	204-945-1312 holly.ervick-knote@gov.mb.ca
Petra Loro	Agriculture	Livestock Environment Specialist <i>Sustainable Agriculture Branch</i>	204-918-0325 petra.loro@gov.mb.ca
Julie Froese	Environment and Climate Change	Environmental Livestock Coordinator <i>Environmental Approvals Branch</i>	204-945-7104 julie.froese@gov.mb.ca
Karin Newman	Natural Resources and Indigenous Futures	Habitat Mitigation Specialist <i>Wildlife Branch</i>	karin.newman@gov.mb.ca
Jeff DiNella	Transportation and Infrastructure	Senior Development Review Technologist <i>Highway Planning and Design Branch</i>	204-430-7176

Appendix A

Manitoba Natural Resources and Indigenous Futures – Fisheries Branch

Fisheries Branch staff have reviewed the proposal and advise that if the proponent adheres to all mitigative measures prescribed by ECC to protect surface waters and riparian habitats, we have no additional concerns with the proposal as described.

Manitoba Natural Resources and Indigenous Futures – Lands and Planning Branch

A review of the information provided suggests there is no impact to Crown land administered under The Crown Lands Act. This review is based on information known to the Lands and Planning Branch as documented in the Crown Lands Registry System.

Manitoba Agriculture – Sustainable Agriculture Branch

In areas of higher livestock intensity, such as the RMs of Hanover and La Broquerie, it is currently the Province of Manitoba's policy to require sufficient suitable land for all of the nitrogen and all of the phosphorus generated by the livestock. In areas of lower livestock intensity, such as the RM of Stuartburn, 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 in areas of lower livestock intensity to balance manure phosphorus with crop phosphorus removal, should it be necessary in the future.

Typical, modern feeding practices for dairy were used to estimate nutrient excretion by the livestock at Eaglebrook Farms. Ten-year Manitoba Agricultural Services Corporation (MASC) crop yield averages in the RMs of Hanover and La Broquerie were used to estimate crop nitrogen uptake and phosphorus removal rates for the crop rotation specified in the proposal.

Land suitability is determined using soil testing for phosphorus and soil survey to establish the agriculture capability. Soils must be below 60 ppm Olsen P to be considered suitable. Semi-detailed soil survey is available in the area to determine the agriculture capability of the land. The soil survey indicates the land contains agriculture capability Classes 2 to 6. The limitations in the area are lack of moisture (M) and wetness (W), typical of wet sands. Classes 1 to 5 are considered suitable for manure application. Some of the fields that are currently in corn, alfalfa or grass production are mapped as Class 6W. Manure application is prohibited on Class 6W soils because of the severity of the wetness limitation. Due to the extent of the areas under corn and alfalfa production that are mapped as Class 6W, Manitoba Agriculture conducted a site visit on May 12, 2025. It was confirmed that fields 8, 14, 22, 24 and 27 are not Class 6W and should not be prohibited from manure application. Any areas Class 6W that do exist should be identified by the producer or manure management planner and excluded from the manure management plan.

The estimated land requirement for Eaglebrook Farms is 2210 acres for the phosphorus or 1576 acres for the nitrogen, whichever is higher. Eaglebrook Farms has satisfied the land requirement by demonstrating that they have access to 2218 suitable acres.

Manitoba Environment and Climate Change – Water Science and Watershed Management Branch

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 2001).

The proponent is planning to apply manure in spring, summer and in fall, partial injection of liquid manure and broadcast and incorporated within 48 hours for solid manure with the exception of established stands of alfalfa where no incorporation will occur. Injection and broadcast with incorporation will reduce the risk to surface water when compared to broadcast only application methods and spring/summer applications are lower risk than fall applications.

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. Injection or incorporation are practices which reduces N loss when compared to broadcast only application.

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 (P) as a nutrient by which fertilizer application through manure, synthetic fertilizer, and municipal waste sludge to agricultural lands may be limited. Many agricultural soils in Manitoba, especially areas with low livestock intensity, are considered P deficient and therefore, manure is an ideal fertilizer to support crop production. However, manure application can increase soil P over time and other spread fields may need to be added to prevent excessive soil P build up. As excess P levels build up in soils, greater losses occur to surface and ground water. It should be noted that Olsen soil-test P levels of 60 ppm are well above P needs for most crops (over 20 ppm is usually considered agronomically very high). To remain environmentally sustainable over a long-term planning horizon of 25 years or more the proponent acknowledges that 2332 acres may be required for the operation to achieve P balance [P removal equal to P application] with current crop choices and yield potential.

As P levels build up in soils, the concentration of P 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 soil test levels to maximize the benefits from the P in the manure and to prevent excessive P buildup when applying manure at rates above P balance (P removal by harvested crops).

During manure spreading, setback distances to all groundwater features as prescribed under the Livestock Manure and Mortalities Management Regulation should be considered as a minimum distance.

Appendix B

Eaglebrook Farms

Response to Comments posted during Public Review Period

Eaglebrook Farms would like to take the time to address the concerns raised by area residents addressing the proposed dairy farm expansion. We appreciate the time our neighbours have taken to voice their concerns and we respect all opinions. The comments submitted share common themes, and the following is a response to the major concerns expressed during the public review period.

1. MANURE APPLICATION, STORAGE AND ODOR CONTROL MEASURES

Eaglebrook Farms currently utilizes an earthen manure storage (EMS) to store the liquid manure produced on the farm until used as fertilizer on agricultural land. We are working on a plan to add an additional cell to the current EMS. This is being done to reduce the amount of times manure needs to be applied throughout the calendar year (ie. odor and traffic mitigation). EMS systems are regulated and routinely audited by the Province of Manitoba to ensure that manure stays within the lagoon and does not contaminate ground and surface water. Eaglebrook Farms will work with the MB

Environment and Climate Change to ensure the EMS meets all regulatory requirements. Straw bedding is used in our dairy and once it goes into the lagoon it acts as a mat to help mitigate odours. The nearest residence is over 1/2 mile away from lagoon.

All fields utilized for manure spreading have been filed in a Manure Management Plan and approved by Manitoba Environment and Climate Change prior to manure application. Eaglebrook Farms conducts annual manure analysis and soil testing to determine crop nutrient requirements and monitor soil residual nitrates and phosphates to ensure soil test levels stay below the regulatory limits.

Manure is a natural fertilizer for crops grown on affected lands. It should be noted it replaces commercial chemical fertilizer that is used on fields not utilizing manure.

Manure is a valuable resource and helps our farm be sustainable by cycling nutrients and not having to import conventional phosphorus fertilizer. We do not want to see any of these nutrients applied for crop production leave our fields and cause any harm to the surrounding environment.

Lastly, and most importantly, we encourage our neighbours to contact MB Environment and Climate Change or contact the farm directly to address any concerns they may have.

2. WATER USAGE AND QUALITY

Surface and groundwater protection are provided through environmental regulations and monitoring done by the Province of Manitoba through, for example, monitoring wells adjacent to the proposed multi-cell earthen manure storage structure. Provincial

regulation also strictly prohibits the application of manure near wells, drains and inundated areas to prevent manure from escaping the fields designated for spreading. Working with the province, we want to ensure that water supplies will not be impacted by the proposal. Clean, abundant, and safe drinking water is not only important for our community but essential to the health of our herd. Eaglebrook has been producing gold standard milk for many years and was nominated dairy farm excellence award in 2019. We pride ourselves on having outstanding herd health and milk production and are committed to continue to provide Manitobans with high quality dairy products.

3. ROADS AND TRUCK TRAFFIC

There are two components to issues relating to roads: safety and damage. With respect to the safety aspect, truck drivers for Eaglebrook Farms are licensed and must follow all the rules of the road pertaining to farm equipment and vehicles. All drivers must stop at all stop signs and exercise caution at uncontrolled intersections. When neighbours have talked to us about dust, we have taken multiple paths to fields to mitigate dust when possible. On muddy years, we have put a tractor on the road and scooped mud back to field, sometimes all day, every load. We have not used custom large tankers for over 10 years. We use either drag line hose or our own smaller tankers. To decrease road wear and tear. Eaglebrook Farms also hauls as much solid manure in winter when roads are as frozen as possible and stockpile on fields to reduce spring road usage and summer dust. We have floatation tires on many feed and manure and silage wagons to spread weight as much as possible on roads.

We encourage Eaglebrook Farms to be contacted directly and promptly should issues arise so that specific situations can be addressed as soon as possible.

4. RESIDENTIAL DEVELOPMENT AND TAXES

Residential development and agricultural land in the Rural Municipality is addressed through the RM of Hanover's Development Plan, which designates the various land uses throughout the municipality. There has been a cattle/dairy operation on this land for four generations. Our operation, as well as all the identified manure spread fields included in the site assessment, is found within the Rural Agriculture Area, which is appropriate for the operation as proposed. The farm cannot comment on its potential effects on individual residential property values and taxes but can say that we employ residents from the RM of Hanover and purchase supplies locally from within the RM and surrounding communities.

Eaglebrook has always been a part of the community and willing to help neighbours when called. We have had the pleasure of offering employment to many young people and neighbours over the years. And we will continue to be the best neighbours we can. If issues arise, please stop in and we can address them, and we will accommodate if possible. We have been doing this and will continue to do so for our community. Thank you once again for your engagement and understanding.

Sincerely,

The Klassen Family

Eaglebrook Farms