

Webb, Bruce (CON)

From: Webb, Bruce (CON)
Sent: November-25-11 10:27 AM
To: Strathclair, R.M.
Subject: Salt Lakes Water Level Modification Project File: 5538.00
Attachments: Salt Lakes MWS Comments.doc

I have completed a review of all public and federal and provincial Technical Advisory Committee (TAC) comments received during the initial environmental assessment of the Salt Lakes project. We received 28 public comments on the project, with some comments expressing support for the project and others identifying concerns. Items requiring additional information from you are listed below. I am also including several comments for your information.

Additional Information Requirements:

1. The Proposal does not indicate what the desired regulated water would be for South Salt Lake, and how this level would be achieved. It appears that no changes are planned in the existing outlet of South Salt Lake. If this is the case, a detailed explanation is needed concerning how, when and where conditions on South Salt Lake and the downstream outlet route would be assessed to determine if operation of the proposed control structure could occur. (In essence, what would be the detailed rules of operation for the proposed control structure?) Also, information on consequent water level effects on South Salt Lake is needed. If changes to the outlet of South Salt Lake are contemplated, information is needed on the size, elevation and operation of the outlet works.
2. **Water Quality:** Parts 3 and 4 of the proposal's Environmental Impact Assessment report present six field sample results and four laboratory analyses, all from October and November of 2010. No analysis of the results are provided in terms of comparisons with Manitoba Water Quality Standards, Objectives and Guidelines, nor are earlier sampling results provided. While a monitoring program would be required in an Environment Act Licence for the project, the minimal results provided indicate that a closer look is warranted at water quality in the drainage system and the water quality effects of the project. Therefore, all available water quality monitoring information should be provided for each sampling site, along with analysis and a discussion of the results and the anticipated changes in water quality resulting from the project in South Salt Lake and the downstream drainage system.
3. Salinity effects on downstream agricultural land that may be exposed to increased flows and duration of flows should be discussed. (This effect is introduced very briefly in the proposal and illustrated without discussion in the map on page 10 of the Environmental Impact Assessment.)
4. Effluent from the Strathclair wastewater treatment lagoon: Clauses 11 and 19 g) of Environment Act Licence No. 2624 prohibit discharge of the Strathclair wastewater treatment lagoon to a location other than North Salt Lake, and prohibit discharge of the lagoon when the effluent drainage route is flowing or likely to flow to South Salt Lake. In conjunction with the present Proposal, the RM will have to request an alteration to Environment Act Licence No. 2624 to accommodate the regular occurrence of water flow from North Salt Lake to South Salt Lake. The alteration request should describe the requested alteration in detail, as well as the anticipated environmental effects of the alteration and any mitigation measures that will be implemented to address potentially harmful environmental effects.

Information Only:

1. The RM will have to apply for a Water Rights Licence to construct Water Control Works for the project from Manitoba Water Stewardship, if it has not already done so. This application should include written consent from all affected landowners and a map displaying the affected lands and their owners. The application will also require a detailed plan of the proposed control structure(s), their operating rules, and channel slope and erosion control methods.

2. Manitoba Water Stewardship advises that wetland infilling is not permitted without authorization. This may affect the use of excavated material to fill in low areas. Designated excavation spoil sites will have to be identified in the Water Rights Licence application.
3. Full comments on the proposal from Manitoba Water Stewardship are attached for information and context.
4. When undertaking excavation, consultation should occur with hydro, telephone and gas utility operators to avoid disruptions to buried infrastructure.
5. The RM will have to make an application under the Navigable Water Protection Act permit as per the request from the Canadian Environmental Assessment Agency of October 25, 2011.

With respect to matters identified by Environment Canada in its letter of October 17, 2011, I will review Maps 1 and 2 with Environment Canada staff and advise of any remaining concerns following this review.

Please contact me at 204 945-7021 or Bruce.Webb@gov.mb.ca if you have questions or require clarification on any of the matters discussed above.

Bruce.

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