

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Manitoba Conservation and Water
Stewardship - Parks and Protected Spaces
Branch

PROPOSAL NAME: Brereton Lake Water Treatment Plant

CLASS OF DEVELOPMENT: One

TYPE OF DEVELOPMENT: Waste Disposal - Water Treatment Plants
(Wastewater)

CLIENT FILE NO.: 5773.00

OVERVIEW

The Proposal was received on May 21, 2015. It was dated May 20, 2015. The advertisement of the proposal was as follows:

“A proposal has been received from JR Cousin Consultants Ltd. on behalf of the Parks and Protected Spaces Branch of Manitoba Conservation and Water Stewardship for the construction of a water treatment plant at the Brereton Lake Campground in Whiteshell Provincial Park. The plant would withdraw up to 2.32 litres per second of water from the lake, treat it using a filtration/ultrafiltration process, disinfect it using ultraviolet and chlorine disinfection, and distribute it within the campground and the adjacent Brereton Lake Resort. Reject water from the treatment process would be returned to the lake. Construction of the facility is proposed for the late summer and fall of 2015.”

The Proposal was advertised in the Winnipeg Free Press on Saturday, June 13, 2015. It was placed in the online public registry, the Legislative Library and Millennium Public Library (Winnipeg) public registries. The Proposal was distributed to Technical Advisory Committee (TAC) members on June 11, 2015. The closing date for comments from members of the public and TAC members was July 13, 2015.

COMMENTS FROM THE PUBLIC

Judy Cornell

I was pleased to see the notice in the paper regarding the Water treatment plant for the Camp Ground at Brereton Lake.

It is long long past due and it will be so good to finally have the campers NOT BATHING IN THE LAKE.

Brereton Lake's algae content is growing yearly; not just from the camp ground bathers but also from leakage from septic systems. The showers and the new lagoon for the Camp ground are a major first step to cleaning up the Lake.

Cost of course is of concern.

Can I ask the estimated /budget costs of the program?

How will the capital cost of the water system be shared by the camp ground and by the resort?

What percentage paid by the parks department and what percentage paid by Brereton Lake Resort?

What is the estimated cost to operate the water treatment system per year?

What percentage of that on going operating cost will be covered by the government and how much by Brereton Lake Resort?

I look forward to hearing back from you regarding the costs of this project and who will shoulder those costs.

Disposition:

Cost considerations are outside of the scope of the environmental assessment and licensing process. However, to facilitate understanding of the project among area residents and commercial operators in the park, information to address these comments was requested from the Parks and Protected Spaces Branch. The response was relayed to the writer for information.

Doug Moberg

We all know that whatever is going on in the Whiteshell now that the cottagers and it's association are not being consulted. This is contrary to the Parks act and shows little or no TRANSPARENCY which is not only bothersome but worrisome.

When any proposal for work being done in the Whiteshell is on the table we think that the stakeholders, which includes cottagers, campers and commercial operators should be DIRECTLY NOTIFIED, not by a blurb in the local library and newspaper that can easily escape our notice.

As a member of the cottage association I would like to be notified, in good time, so we can advertise in our paper "The Whiteshell Echo".

I'm tired of these games that the present government is playing with us. So, my question is: Who will be paying for this?

Disposition:

As discussed above, additional information to address project costing was requested and provided to the writer for information. With respect to the advertisement of the Proposal, the Winnipeg Free Press was used because of the publishing schedule of the Whiteshell Echo.

Raquel Lincoln

I would like to take this opportunity to provide comments on the proposed Brereton Lake Water Treatment Plant for use by the Brereton Lake Campground as well as Brereton

Lake Resort. If my comments and questions are not relevant to your area of expertise, please pass them on accordingly.

I applaud Manitoba Conservation's initiative to make water quality a priority in the Whiteshell.

However, I would like to request information as to the budget/expediture details for this project.

My understanding is that the 'Parks District' process of cost recovery is still in review/development so I would like to inquire as to how this project will be funded by the Manitoba Government and a commerical resort. As this type of project only benefits guests of Manitoba Conservation and that of Brereton Lake Resort, one would assume that project costs will be borne by those two parties only. Cottagers and remaining commercial operators cannot be expected to cover any portion of capital project construction costs nor ongoing operation and maintenance costs in future. I would also like to request information on how 'usage' will be monitored for each party so that there will be no doubt as to what quantity each user - public, private or commercial, is responsible to pay for.

As a commercial operator in the Whiteshell Provincial Park that does not have the advantage of access to publicly subsidized treated water or sewage disposal, I am very hopeful that the pending 'newly developed parks district system' will equalize the operating field for those that do not have opportunities for these services. I assume that with a new state-of-the-art facility, Manitoba Conservation will be able to calculate exact costs to operate this facility and therefore Parks' District fees will be a true reflection of such to the user, rather than a token nominal increased fee to any user, for the ability to 'tap in' to this necessary utility.

Disposition:

Information on cost sharing was requested and forwarded to the writer for information.

Laurie Scarfe

My husband Bill and myself are owner/operator of Jessica Lake Lodge, just 10 KM further into the Park from Brereton Lake Resort.

The concerns that we have regarding the plant and the supply of drinking water for the Camp Ground and for Brereton Lake Resort are:

- The Cost. Who will be responsible for the cost of such a plant and getting the drinking water all the way to the camp ground and as we understand, also supplying the resort.

The cottagers and the commercial people have the "park district fees" that we are responsible for and the cost for operating and maintaining the park is divided amongst us. If the cost of the project is going to be put back into the district fees, then we are completely against such a project. Before this project can come to be, these questions have to be answered. The Park District Fee structure has been in

- limbo for many years and not a true representation of what it costs to operate the park.
- What is the budget for maintaining this treatment plant and who will be covering the yearly costs of this???
 - Secondly, at what cost is it to Brereton Lake Resort to receive drinking water delivered to their door. First they get Park sewer service and now drinking water. The expense of waste removal for us and maintaining our water system for our resort is well over \$20,000 a year for us. Therefore, if you are providing one resort with sewer and water, then I would also like to put in a request for the same.
 - Thirdly, why was the decision made to use the existing well at South Beach Brereton and run all that distance to the campground. Would it not be more cost effective to drill a new well in the campground and save the miles and miles of expense getting the water to the campground and possible resort?

Disposition:

Information on cost sharing was requested and forwarded to the writer for information. With respect to the use of the existing well at the South Beach, this option is discussed as an alternative in the Proposal, but the chosen option involves a lake intake at the campground. This information was clarified for the writer.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE

Manitoba Conservation and Water Stewardship – Lands Branch

No concerns/comments.

Manitoba Conservation and Water Stewardship – Wildlife and Fisheries Branch

No wildlife related concerns.

Manitoba Conservation and Water Stewardship – Water Science and Management Branch, Water Quality Management Section

The proposal is to upgrade the drinking water treatment plant to a reverse osmosis system with reject water and backwash proposed to be directed towards Brereton Lake.

The proposal suggests the proposed discharge of concentrate from the Water Treatment plant will minimally affect the water quality in Brereton Lake. Brereton Lake is an important recreational water body in Whiteshell Provincial Park. The lake suffers from occasional nuisance algal blooms which can be dominated by species capable of

producing liver and nerve toxins. Review of data collected as part of the provincial beach monitoring program shows that concentrations of the algal toxin Microcystin LR occasionally have exceeded the maximum acceptable concentration for drinking water of 1.5 micrograms per litre pursuant to the Manitoba Water Quality Standards, Objectives and Guidelines (2011). The proponent will need to ensure the proposed treatment plant is capable of removing potential algal toxins to acceptable concentrations, for this determination I would defer to Office of Drinking Water.

Concerning any backwash, the proponent will need to insure that if chlorinated water is used it is de-chlorinated prior to release in Brereton Lake.

Disposition:

These comments can be addressed through licence conditions.

Manitoba Conservation and Water Stewardship – Office of Drinking Water

This project will require a Permit to Construct or Alter a Public Water System, as called for in *The Drinking Water Safety Act*.

We also note that information on file at DWO indicates Brereton Lake is susceptible to algae blooms and levels of microcystin above allowable limits for drinking water. These parameters can present significant challenges to treatment processes such as those proposed for this application. Details of how the proposed treatment process will reduce these parameters to at or below allowable levels as well as how the filtration stages, both particulate and reverse osmosis will deal with the fouling potential presented by large concentrations of algae in raw water, will have to be provided as part of the Application for Permit to Construct or Alter a Public Water System submission package.

Apart from these points, Office of Drinking Water did not note any other cause for concern with the EAP or proposed project respecting drinking water quality or safety.

Disposition:

These comments were provided to the proponent's consultant for information.

Manitoba Conservation and Water Stewardship – Water Control Works and Drainage Licensing Section

For any water control works, contact the local Water Resource Officer and ensure that the works meet required specifications.

Disposition:

This information was provided to the proponent's consultant.

Manitoba Infrastructure and Transportation - Highway Planning and Design Branch, Environmental Services Section

MIT has reviewed the proposal under the *Environment Act* noted above and we offer the following comments:

- Under *The Highways and Transportation Act* permits are required from MIT for:
 - o any new, modified or relocated access to a Provincial Road or Access Road;
 - o any structures (including advertising signs, wells, septic fields, etc.) on, under or above the ground within the 38.1 meter (125 ft) Controlled Area adjacent to Provincial Roads;
 - o discharging of water or other liquid materials into a ditch of a Limited Access Highway, Provincial Road or Access Road; or
 - o placing any trees or plantings within 15.2 metres (50 feet) of the edge of right-of-way of a Limited Access Highway, Provincial Road or Access Road.
- An underground utility agreement will be required for any pipelines that will go under any Provincial Road (PR) or Provincial Trunk Highway (PTH).
- The proposed water treatment plant is shown as being situated along the shoreline of Brereton Lake, west of the Parks Office. The 100 year flood level of Brereton Lake is 317.00 metres (1040.0 feet) G.S. of C. Datum, but we do not have any topographic information of the shoreline lands of Brereton Lake with which to assess the hazard. Water Management recommends that all permanent structures are confined to lands in excess of the 100 year flood level, as determined by survey.

For details on permit applications and underground utility agreements, please contact Mr. Murray Chornoboy, Regional Planning Technologist, at (204) 346-6287 or via email at Murray.Chornoboy@gov.mb.ca.

For concerns on flood levels and associated hazards in the vicinity of Brereton Lake, please contact Mr. Brad Allum, Development Review Officer, at (204) 945-2121 or at Brad.Allum@gov.mb.ca.

Disposition:

This information was provided to the proponent's consultant.

Manitoba Agriculture, Food and Rural Development, Crops Branch

No concerns.

ADDITIONAL INFORMATION

As discussed above, additional information was requested to address public comments on the proposal. This information involved cost and cost sharing information that is outside of the scope of the environmental assessment and licensing process. Accordingly,

information received in response to this request was relayed to the writers for information only. No additional information was required to address Technical Advisory Committee comments on the proposal.

PUBLIC HEARING

As no requests for a hearing were filed, a public hearing is not recommended.

CROWN-ABORIGINAL CONSULTATION

The Government of Manitoba recognizes it has a duty to consult in a meaningful way with First Nations, Métis communities and other Aboriginal communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise of a treaty or Aboriginal right of that First Nation, Métis community or other Aboriginal community.

The proposal involves the construction of a new water treatment plant to service existing infrastructure with the same water source being used and an improved water treatment process. As resource use is not affected by the project, it is concluded that Crown-Aboriginal consultation is not required for the project.

RECOMMENDATION

It is recommended that the Development be licensed under *The Environment Act* subject to the limits, terms and conditions as described on the attached draft Environment Act Licence. It is further recommended that enforcement of the Licence be assigned to the Eastern Regional office of the Environmental Compliance and Enforcement Branch.

PREPARED BY:

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July 23, 2015
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