

Dagdick, Elise (CWS)

From: Kaita, Adara (CWS) **On Behalf Of** +WPG1212 - Conservation_Circulars (CWS)

Sent: July-26-13 2:41 PM

To: Dagdick, Elise (CWS)

Subject: Information Request - EA Proposal - Sunterra Horticulture - Sunterra Peat Mine Development - File No. 4254.10

Hi Elise,

I have received the following response to the information provided by Sunterra:

- In regards to drainage, no works will be authorized outside the scope of what was originally applied for and licensed.
- Any new work outside the scope of the original proposal requires a new application, new review and new external agency approvals where appropriate.
- Any drainage that is proposed cannot proceed without a water rights licence which would address a number of the issues they explain in the text of their letter.
- The Central Region (Lands Branch) had requested a road decommissioning and mitigation plan which is not apparent. There is no mention of a fire plan in the response.
- The response does not acknowledge that Sunterra is aware of or acknowledges the ancillary approval requirements in addition to the EAL. The requirement for Crown land general permits for development (roads etc.) that are not located on the quarry lease area will be required and will be subject to the Peguis TLE framework agreement, water rights licensing, work permits etc.

Thank you,

Adara Kaita

Crown Land Programs and Policy Manager
Conservation and Water Stewardship
Box 25, 200 Saulteaux Crescent
Winnipeg, MB R3J 3W3

Dagdick, Elise (CWS)

From: Kanya, Veronika (CWS)

Sent: July-24-13 12:01 PM

To: Dagdick, Elise (CWS); Firlotte, Nicole (CWS)

Subject: RE: Sunterra Peat Mine project - response to information request

Good morning Elise,

"The following comment is in response to question h. The assessment report does not address or explain how the hydrological, ecological and carbon storage function of the peat lands will be restored; bullet 5: Topspit (Sphagnum Moss mulch) will be spread over the leveled field to promote natural re-vegetation on the bog surface. Transfer of the moss layer from donor sites also transfers the plants and propagates from the donor bog which ensures the continued presence of typical bog plants in the restored bog. Within 7 to 10 years, the bog surface will return to a functioning wetland ecosystem.

The proponent proposes to use material from a donor bog to promote natural re-vegetation during the progressive rehabilitation process. Where is the donor bog and what authority does the company have to remove material from the donor bog? This strategy may work quite well if the donor bog is the portion of the lease that will next be stripped prior to extraction, assuming the new area is large enough to ensure sufficient material for the rehabilitation process. However, what will happen during the final stage of rehabilitation if no further lease area is available?

It is my understanding from discussions with the proponent that occurred during a site visit of the existing Sunterra Beaver Point Bog operation on 9 May 2013 that:

- a) the normal development process involves the mulching and mixing of the surface layer of vegetation, including sphagnum moss, into the upper peat layer. This would result in the sphagnum moss layer being un-available for use in the progressive rehabilitation process, and
- b) donor material for use in the progressive rehabilitation process at an existing operation must come from a subsequent new development. This strategy presumes that the new development, such as the one proposed by Sunterra in the Bullhead area, will be approved and go forward. At the least, this strategy places additional pressure on government to approve new peat extraction sites because it is critical to the progressive rehabilitation process. How can a review of the EAP for a new peat development be conducted in an objective manner when decision-making is influenced by the impact it may have on the success of rehabilitation of existing operations.

The proponent should be required to design a progressive rehabilitation process that uses donor material from the next development area from within their existing operation, rather than mulching and mixing this material into the peat layer to be extracted. This strategy would eliminate the need to obtain donor material from other bogs, but require that the operator to design the final rehabilitation phase in the absence of sphagnum moss, which could be a more water oriented wetland scenario."

If you have any further questions or concerns, please feel free to contact me,

Veronika Kanya

Conservation and Water Stewardship - Wildlife Branch

Dagdick, Elise (CWS)

From: Jacobs, Kevin (CWS)

Sent: July-16-13 3:38 PM

To: Dagdick, Elise (CWS)

Subject: RE: Sunterra peat mine - response to information request

Hello Elise,

I reviewed the response to the information request you provided regarding the proposed Sunterra Peat Mine. I have nothing further to add at the present time.

Regards,

Kevin