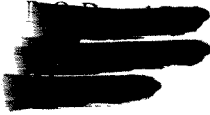


July 12, 2012

Sonja and Denis LeBreton



Environmental Approvals Branch
Conservation and Water stewardship
123 Main Street, Suite 160
Winnipeg, MB
R3C 1A5

Attention: Mr. Darrell Ouimet

RE: Sunterra Horticulture Inc.
File: 4254.10

Dear Sir:

We are full time and permanent residents at Block 1, Lot 3 within Beaver Creek Provincial Park. We were appalled to read of Sunterra's plans to expand their operation at Beaver Point (Mill Creek). We are members of the Beaver Creek Cottagers' Association (BCCA) and are aware of the two appeals submitted against SunGro at Ramsay point (Beaver Creek) and that of Berger at Deer Lake (Little Deer Cottage Development). Now, Sunterra has filed application to double up on SunGro's operation at Ramsay Point and Berger's at Deer Lake. They also want to extend their operation right up past Pine Dock within the Bullhead Bog.

It is a known and proven fact that undisturbed peat will store thousands of tonnes of carbon, thus it acts as the lungs for the air we all breathe. The peat also acts as the kidneys for our already fragile Lake Winnipeg.

The Province of Manitoba passed the Save Lake Winnipeg Act in June of 2011. The spirit and intent of that law was to protect our Lake from further degradation. Now, these peat companies are going out of their way to find loopholes in a well-intentioned but, apparently, flawed piece of legislation.

The Ramsay Point Bog is less than 100 yards from our front door. Twenty-four hours a day, seven days a week from April to November we have to put up with dozens of semi-trailer trucks either going to or coming from Sunterra's existing operation at Mill Creek. Provincial Road #234 is under assault by these trucks during this time. The Department of Infrastructure and Transportation has graders working on the road nearly every day, barring rain. The road is in atrocious shape and that is not the fault of the grader operators. It must be a thankless job for them as each day brings them back to repair the road. The road is extremely dangerous and no matter how the proponents try to sugar coat it, the fact remains their operation is causing hundreds of thousands of tax dollars to be

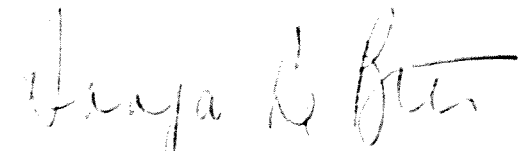
thrown to the wind because of all the repeated maintenance. The Province lays down a dust control solution that would be sufficient on any other road for the entire season. Not here! The solution is only good until the next grading.

We retired to Beaver Creek and have built our dream home. We enjoy going into the forest to see the wildlife. We enjoy watching the various species of songbirds and waterfowl that gather around Ranger Lake. When one observes the operation of Sunterra at Mill Creek they will immediately see that the forest has been strip-mined. These massive peat-harvesting machines vacuum everything in their wake. Should the Province grant this application all of our wilderness will be gone, the air will become more polluted and Lake Winnipeg will suffer more than it does now.

Based on the foregoing we wish to register our strong opposition to this application. Please add our opposition to those already received.

Yours truly,


Denis LeBreton


Sonja LeBreton

Mr. Darrell Ouimet
Environmental Approvals Branch
Conservation and Water Stewardship
123 Main Street, Suite 160
Winnipeg, MB
R3C 1A5

RE: Opposition to Sunterra Horticulture. Peat Mine Development
File: 4254.10

Dear Sir:

The undersigned wish to register their opposition to the application made by Sunterra.

Please add these names to all of the other citizens who oppose this application.

Printed Name	Address	Signature
TODD ALLAN	[REDACTED]	Todd Allan
H. ALLAN	[REDACTED]	H. Allan
G ASHCROFT	[REDACTED]	G. Ashcroft
P. ASHCROFT	[REDACTED]	P. Ashcroft
DOUG DION	[REDACTED]	D. Dion
Iain McManama	[REDACTED]	Iain McManama
ANGIE WARK	[REDACTED]	Angie Wark
TRICIA WARK	[REDACTED]	Tricia Wark
JOHN McDONALD	[REDACTED]	John McDonald
VAL McDONALD	[REDACTED]	Val McDonald
DAVE FAUCETT	[REDACTED]	D. Faucett
Wendy Faucett	[REDACTED]	Wendy Faucett
Kael Smith	[REDACTED]	Kael Smith
Jenna Smith	[REDACTED]	Jenna Smith
Karen Karatichuk	[REDACTED]	Karen Karatichuk

Mr. Darrell Ouimet
Environmental Approvals Branch
Conservation and Water Stewardship
123 Main Street, Suite 160
Winnipeg, MB
R3C 1A5



RE: Opposition to Sunterra Horticulture, Peat Mine Development
File: 4254.10

Dear Sir:

The undersigned wish to register their opposition to the application made by Sunterra.

Please add these names to all of the other citizens who oppose this application.

Printed Name

Address

Signature

3112 S. Salem

[REDACTED]

[REDACTED]

Zabida Saloojee

[REDACTED]

Zabida Saloojee



Mr. Darrell Ouimet
Environmental Approvals Branch
Conservation and Water Stewardship
123 Main Street, Suite 160
Winnipeg, MB
R3C 1A5

RE: Opposition to Sunterra Horticulture, Peat Mine Development
File: 4254.10

Dear Sir:

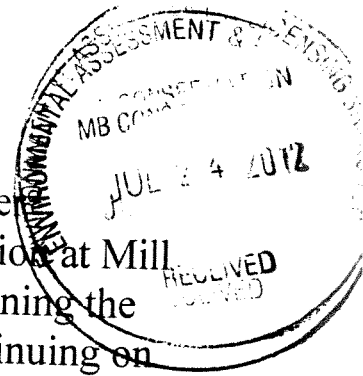
The undersigned wish to register their opposition to the application made by Sunterra.

Please add these names to all of the other citizens who oppose this application.

Printed Name	Address	Signature
[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]
Beaver Creek Cottagers' Association	President - Rick Heuchert	PH. (204) 338-1157 R. Heuchert

* Attached is a list of Beaver Creek Cottagers' Association members. The peat mine development was discussed at our 2011 AGM, and again, in detail at our 2012 AGM. Members expressed concern for the environment in general, and for the overall health of Lake Winnipeg if peat mining development is expanded. Our members are strongly opposed to the peat mining development in general; and specifically opposed to Sunterra Horticulture Peat Mine Development (File: 4254.10). Our 2012 AGM was held on June 30, 2012 at Beaver Creek Recreational Area (P.R. 234).

Sunterra has applied to Manitoba Conservation and Water Stewardship for a licence to expand their existing operations at Mill Creek. This "expansion" will allow them to start strip mining the forest at Beaver Creek, going up to Mill Creek, and continuing on to Little Deer and then finally ending up in the area adjacent to Pine Dock, Leaside and Matheson Island. Quite some expansion!



This application to strip mine the forest in these areas is separate from the existing applications by SunGro at Beaver Creek and Berger at Little Deer. In fact, there will be one continuous strip mine from Beaver Creek right up to the End Of The Road.

Peat, when left undisturbed, stores millions of tonnes of carbon and acts as the lungs for the air we all breathe. It also acts as the kidneys for all water entering Lake Winnipeg. Peat also absorbs spring runoff and reduces flooding.

The forest is home to several species of wildlife. If the Province allows the forest to be strip-mined by these corporations, where will the moose, bears, deer, wolves, coyotes, foxes, raccoons, mink, etc. go? The lakes contained within it, such as Ranger Lakes, Deer Lake Moose Lake, and several others are the staging area for several species of migratory birds and waterfowl.

If you are concerned about green house gases being released into the air, we need you to sign the attached form stating your opposition.

If you are concerned about the further degradation of our beautiful Lake Winnipeg, we need you to sign the attached form stating your opposition.

If you are concerned about the increasing number of semi-trailers on PR 234 and the damage they create, we need you to sign the attached form stating your opposition.

BEAVER CREEK EMERGENCY CONTACT LIST

Last Updated: July 3, 2011

Name (Last, First)	Block/Lot	Cottage Ph	Home Address	City/Prov.	Postal Cd.	Home Phone	E-mail
BLOCK 1							
HUBER, Henry	B1 - L01	276-2000	287 Oakwood Ave.	Winnipeg, MB	R2K 0S1	453-5800	
SUTHERLAND, Allen	B1 - L02	276-2161	Box 311	Riverton, MB	R0C 2R0	276-2161	
LEBRETON, Dennis	B1 - L03		1120 Mountain Ave.	Winnipeg, MB	R2X 1C9	582-3041	
LADOSKI, James G	B1 - L04		283 Sirood Ave.	Winnipeg, MB	R2G 1A8		
HEUCHERT, Rick	B1 - L05	276-2283	463 Sly Drive	Winnipeg, MB	R2V 2H3	338-1157	
HENRY, Barry J	B1 - L06	276-2286	11 Perry Bay	Winnipeg, MB	R2C 3Y5	661-6281	
MCINTOSH, Heather	B1 - L07	276-2269	66 Sandra Bay	Winnipeg, MB	R3T 0K1	452-1344	
MEAKIN, Leonard Fred	B1 - L08	276-2529	42 Willowmeade Cres.	Winnipeg, MB	R2M 4P5	254-8578	
HAMMANN, Friedrich	B1 - L09	276-2288	374 Semple Ave.	Winnipeg, MB	R2V 1C3	339-2651	
PAYNE, Ronald, Herbert	B1 - L10	276-2453	30 Palmer Place	MB.	R0C 2W0	389-5794	
WARK, Helena Isabel	B1 - L11	276-2440	22 Mansard Close	Winnipeg, MB	R2P 0C4	633-7765	
FUCHS, Mel	B1 - L12	276-2139	431 Linwood St.	Winnipeg, MB	R3J 2E2	888-6274	
QUACKENBUSH, Robert	B1 - L13		410 Elmherst Road	Winnipeg, MB	R3R 0T9	832-2179	
BROWN, Mary Aileen	B1 - L14	276-2074	596 Ash St.	Winnipeg, MB	R3N 0R4	951-2225	
LAWRYNUK, William	B1 - L15	276-2347	66 Bethune Way	Winnipeg, MB	R2M 5J3	951-2225	
VOGEN, Elizabeth	B1 - L16	276-2192	653 Foxgrove Ave	East St. Paul, MB	R2E 0A8	669-2144	
VOGEN, Blair	B1 - L17	276-2380	16 Penderennis Drive	West St Paul, MB	R4A 2A9	338-2458	
MALENKI, John	B1 - L18		954 Autumnwood Drive	Winnipeg, MB	R2J 1C4	256-5823	
SKENE, Linda	B1 - L19		16 - 131 Tyndall Ave	Winnipeg, MB	R2X 0Z3	275-5279	
WAKE, Raymond John	B1 - L20	276-2389	127 Costello Drive	Winnipeg, MB	R2Y 1V6	889-8988	
SIMS, Margaret Lorraine	B1 - L22	276-2391	726 Lindsay St.	Winnipeg, MB	R3N 1H7	489-8948	
SIEDLESKI, Merle	B1 - L23		1046 Winderemere Ave.	Winnipeg, MB	R3T 1A4		
BLOCK 2							
TRAUB, Barry George	B2 - L05	276-2430	Box 701	Tuelon, MB	R0C 3B0	886-3369	
GRZENDA, Frank	B2 - L06	276-2040	Box 667	Arborg, MB	R0C 0A0	376-2771	
BUCHTEL, Edward Albert	B2 - L07	276-2261	30 Stonington Ave.	Winnipeg, MB	R3P 2K4	488-6442	
BUCHTEL, Tony	B2 - L08	276-2270	109 Rowandale Cres.	Winnipeg, MB	R2K 0A2	338-8616	

Name (Last, First)	Block/Lot	Cottage Ph	Home Address	City/Prov.	Postal Cd.	Home Phone	E-mail
VASAS, Ulysseus S. G.	B2 - L09		673 Narin Ave.	Winnipeg, MB	R2L 0X4	667-0738	
HELGASON, Janet	B2 - L10	276-2014	Box 156	Arnes, MB	R0C 0C0	642-9498	
ALAM, Lorne	B2 - L11		Box 571	Beausejour, MB	R0E 0C0	268-1062	
ANDERSON, Ronald E	B2 - L12		10 Michael Bay	St. Andrews, MB	R1A 2Z8	334-8856	
MARR, Robert John	B2 - L13		Box 605	Stony Mountain, MB	R0C 3A0	344-5827	
JACQUES, Darrell	B2 - L14	276-2326	440 Raquette St.	Winnipeg, MB	R3K 1N8	888-0363	
BLOCK 3							
PINSONNEAULT, Roger	B3 - L02	276-2482	124 Newman Ave. East	Winnipeg, MB	R2C 0T7	222-0770	
SANDERSON, Kevin D.	B3 - L04	276-2257	478 Kilbride Ave.	Winnipeg, MB	R2V 1B2	334-0329	
REYNOLDS, Carol A.	B3 - L08	276-2021	332 - 2nd St. East, Box 312	Stonewall, MB	R0C 2T0	467-5069	
ASHCROFT, Grant	B3 - L09	276-2447	18 Baillard Cres.	Winnipeg, MB	R2V 1K6	339-5436	
WHERRETT, Al	B3 - L10	276-2386	54 Royal Gate Road	Winnipeg, MB	R3R 2G4	896-3474	
BACALA, Nicholas	B3 - L11	276-2085	239 Linwood St.	Winnipeg, MB	R3J 2C7	888-6919	
SLOAN, Rebecca Faye	B3 - L12	276-2893	Box 284	Riverton, MB	R0C 2R0	256-8096	
JOHNSON, Sheila	B3 - L13		1 - 111 Tyndall Ave.	Winnipeg, MB	R2X 0T3		
BARNETT, Merrle	B3 - L14	276-2467	505 Sinclair Ave.	Selkirk, MB	R1A 0K9		
WYLYCHENKO, Kenneth H.	B3 - L15		679 McIvor Ave.	Winnipeg, MB	R0C 0S0	669-8788	
SCHROEDER, Erich, A.	B3 - L16	276-2526	6 - 600 Davenport Drive	Winnipeg, MB	R2G 1A2	489-2303	
IWANKOW, Garry	B3 - L17	276-2131	7 Harewood Close	Winnipeg, MB	R2G 3L7	338-6172	
MCMANAMNA, Iain, P.	B3 - L18		929 Buchanan Blvd.	Winnipeg, MB	R2Y 1N3		
MCDONALD, John, A.	B3 - L19	276-2473	809 Kebir Place	Winnipeg, MB	R3T 1W8	284-4091	
GRETSCHMANN, Karl	B3 - L20	276-2198	267 Cheriton Ave.	Winnipeg, MB	R2G 0E6	334-1928	
PIRIE, Barbara Joyce	B3 - L21		38 Tracy Cres.	Winnipeg, MB	R2M 4H6	256-8372	
FAWCETT, David James	B3 - L22	276-2494	24 Thorndale Ave.	Winnipeg, MB	R2M 1C6	254-4228	
COULTER, Ryan David	B3 - L23		Box 103, RR #1	Landmark, MB	R0A 0X0		
MARINIC, Jack	B3 - L24	276-2135	614 Pritchard Farm Road	Winnipeg, MB	R2E 0C9	334-1967	
KARATCHUK, Larry and Sharon	B3 - L25	276-2483	Box 360	Garson, MB	R0E 0R0	482-5553	
EMERGENCY NUMBERS							
Fire, RCMP, Ambulance	C1						
RCMP - Arborg	C2	911	Ambulance 642-4040				
MB. Conservation - Parks	C3	376-5251		Arborg, MB			
	C4	378-2261	378-2945	Riverton, MB			
	C5						

July 21st, 2012

Manitoba Conservation
Environmental Assessment and Licensing Branch
Suite 160, 123 Main Street
Winnipeg, Manitoba
R3C 1A5

ENVIRONMENTAL ASSESSMENT

MB CONSERVATION

JUL 23 2012

RECEIVED

Att: Mr. Darrell Ouimet

Re: Sunterra Horticulture (Canada) Inc.
Peat Mine Development
Environment Act Proposal

Dear Mr. Ouimet;

Thanks you for your response of June 26th past to my June 25th query relative to the above.

After reading "Notice of Environmental Act Proposal" posted in the Winnipeg Free Press June 23rd, 2012 with the explicit offer to affected persons the opportunity to make representations, reviewing Sunterra's proposal as prepared by KGS GROUP and your response noted above, I offer the following observations, concerns and questions.

ROAD -

Provincial Road 234, particularly north of Beaver Creek, is just that – a road, not a highway; gravel, narrow by any standards – in places just enough for a large truck and car to pass with a minimum degree of safety, extremely soft edges in places (evidenced by the deep ruts left by heavy trucks driving to the right while passing vehicles), virtually no shoulders, deep water filled ditches in places, road side vegetation (mowed at the most yearly), and narrow cut backs that haven't been cleared for approximately ten years - far narrower on the West than the East hydro right of way. Further, the road consists of hundreds of curves many of which are virtually blind with elevation changes thrown in for good measure. Coupled with the propensity for drivers to hug the middle of the road for safety and it might best be considered an *adventure*.

Add to this the dust, most particularly after a grading, and passing of vehicles, especially large trucks, leaves drivers virtually blind for unreasonable time frames; the narrow cutbacks creating a tunnel effect. Throw in the estimated increase in daily truck traffic of 12 *roundtrip* loads – most probably on the low side (Table 2) and the accident threat rises exponentially. Further, the average estimated distance of travel of 5km (pg 81) is certainly circumspect given the realities of distance between Bullhead (North & South), Little Deer and Ramsay Pt. sites from Beaver Creek. The assertion that increase in traffic is, at the most, small in comparison to resident traffic is somewhat misleading given the type of traffic involved and its impact on safe passing, dust, road deterioration etc.

Unless there are major road upgrades, widening of cut backs (particularly on inside curves), increased roadside vegetation cutting and dust prevention measures taken the development should not be allowed to proceed.

Site –

Given the overall site size and location of the Bullhead proposal it is patently obvious the staging area was selected solely on a cost benefit basis to Sunterra with no consideration whatsoever towards the adjacent long standing cottage development and the enjoyment of property and investment these stakeholders share. Not only is the proposed access road situated to provide the nearest access to PR234 but also the nearest to its proposed neighbors. If this is Sunterra's corporate citizenship strategy then what, if any, weight can be placed on their promises towards stakeholder's interests, environmental and wildlife protection, noise, dust and safety concerns!

Further, PR234 curves from the south entrance to Leaside Beach straightening just before the north entrance with a semi obscured rise dangerously close to the proposed access road turnoff. Entry/exit problems with oncoming traffic abound. In comparison, a new landfill site built by the Federal government near the Calder's Dock turnoff for the area residents including cottagers has yet to open. I am given to understand that initially, at least, provincial licensing was denied given the site access road and its proximity to a curve/elevation change; a concern not dissimilar to the proposed Sunterra access road.

Noting their site dust control proposal i.e. harvesting cessation during adverse wind conditions, what are the proposed velocity parameters, who set them and how will they be monitored? Should the agreed parameters prove detrimental to operations where is the resolve – to Sunterra's favor or area cottagers?

With respect to noise factors not only is the so called buffer zone separating the staging area only approximately 750 ft. but the distance from PR 234 to the cottage development is far less.; perhaps only 300 ft. in places. The former has already been subject to logging with untouched timber far less than suggested. Construction noise, production noise including harvesting tractors, heavy loader and grader equipment may well exceed that suggested by Sunterra. Further it appears that on site electrical generation (30,000 watt generator) is proposed vs. Hydro access (or is that simply back –up)?

Increased heavy truck traffic, access braking/accelerating (including the use of engine retardant brakes) will only serve to contribute to the noise levels experienced by the nearby cottage area. I passed the Beaver Creek facility one morning recently around 6:45AM and there was already a heavy semi truck waiting to enter – so much for noise abatement measures!

It is proposed to utilize the existing creek system for excess drainage into Lake Winnipeg. The current experience already leaves something to be desired with high roadside ditch water levels and local beaver activity contributing to creek damming and constriction. What are the contingency plans should the proposal result in greater increased water levels than purported and who is responsible? What of erosion issues?

The cottage area now sits on very boggy land in places with a very high water saturation level. With a decrease in peat absorption capabilities associated with the farming proposal what of the danger to even increased water levels in the cottage area and possible serious erosion effects? What are Sunterra/Provincial liability responsibilities?

Land Owners –

What of the cottagers and their enjoyment of property and quality of life? I, for one, did not choose a wilderness cottage location approximately three (3) hours driving distance from home, fifty (50) minutes or more along a narrow winding gravel road to sit adjacent to a large commercial peat farming business. Rather, I chose a pristine part of our Province, relatively isolated, with a lack of mass human activity for a reason; none of which included all the detriments that will be brought upon us if this application is approved.

My eldest son suffers from rather excessive allergy problems, particularly pollen and dust particulates. Certainly his quality of life will be impacted while visiting our cottage as may his children's.

The proposal talks of Sunterra's investment! What of the investment of area cottagers – or loss thereof as a result of the proposed development. I liken this to a housing development where a mining company is allowed to expand an "open pit" mining operation on adjacent property irrespective of it being Crown Land or not. I doubt it!

Danger of setting a forest fire as a result of operations is by Sunterra's own admission a *major* concern. What of cottage loss and the subsequent insurance issues that would obviously arise. Should the application be approved I would expect an obligation on my part to advise my Insurance Company of this new "major fire concern". What are Sunterra's obligations or the Province's for that matter being the responsible authority towards covering increased premiums or, in the extreme, outright coverage denial?

Environmental effects –

While I have grave concerns about potential environmental effects on local fauna and flora habitat as well as Lake Winnipeg's nutrient levels, I am not sufficiently versed in these areas to comment further. Suffice to say the fairly recently approved Save Lake Winnipeg Act certainly speaks volumes to the wide concerns of all forms of contamination possibilities affecting the quality of water in one of Canada's largest and best known bodies of water.

It was interesting to read articles, copies attached, covering provincial environmental concerns in this weeks Winnipeg Free Press – Thursday July 19th “Province set to shut down composter” and Saturday July 21st “Peat-mining loophole irks wilderness group”. While the population figures in the affected areas unquestionably vary greatly there are far more important and potentially serious differences between the two situations – albeit they may be considered subtle in some quarters! The first article quotes Assistant Deputy Minister of Conservation and water Stewardship Dan McInnis “we don't want to cause harm to a green initiative, but at the same time, we can't have something like this happen that impacts others.....He doesn't have the right to ruin people's barbeques.”


Odor and barbeques vs. “major” forest fire potential and road safety issues, “moderate” dust particulates - both air and water borne, increased sediment levels in surface water, increased lake pollutants and greenhouse gasses, noise disturbance, unknown disturbance to fauna and floral habitat; subtle issues notably to some but rather disturbing differences to my mind! I trust the Minister will agree.

There are those who probably espouse the notion “only a few seasonal cottagers are affected” – well guess what! Sunterra is a seasonal stakeholder too. I, for one, have never been informed by Sunterra of their application and if not by chance word of mouth and subsequent contact with you, I would not have known of the noted “Notice of Environment proposal”.

Finally, this application must not be considered in isolation of others in the area particularly as it affects road conditions and vehicular safety. Sunterra's truck traffic projections are just that – theirs and by their own admission accounting for other proposed operations will increase heavy truck traffic by a minimum of 59 roundtrips daily. That is not *small in comparison*.

I would appreciate the opportunity to attend a public hearing given this is simply not an environmental issue but encompasses road design and safety, health, quality of life and financial considerations. All must be on and at the table.

Respectfully submitted


George C. Dobson





Province set to shut down composter

Piles must be moved by Aug. 8

By Bruce Owen

THE province has ordered a McGillivray Boulevard garden-supply business to remove its stinky compost piles from its site by Aug. 8 or the government will do it for them.

Manitoba Conservation and Water Stewardship said Wednesday it will enforce an environmental protection order issued against Samborski Environmental Ltd., following an unsuccessful effort over the past year to get the company to move its commercial-compost operation to a new site.

"This is not a decision we took lightly," said Dan McInnis, assistant deputy minister of conservation and water stewardship. "We don't want to cause harm to a green initiative, but at the same time, we can't have something like this happen that impacts others."

"He just doesn't accept the fact that his cause isn't some higher cause. He doesn't have the right to ruin people's barbecues."

McInnis also said Samborski Environmental does not have a provincial environmental licence and the site isn't zoned for such an operation.

Lenn Samborski, who runs the 90-year-old family business, was unavailable for comment.

Longtime Brady Road resident Ken Maes said Samborski should have been shut down long ago. "If you don't have a licence you shouldn't be operating it," he said. "They are also not doing it properly. There's no oxygen getting into the piles. When they go to turn them, it absolutely reeks. It's absolutely unbearable."

Talks with Samborski about moving started last year after the province received more than 200 complaints from residents and neighbouring businesses about the odour and management of the site.

"They're huge piles," Maes said. "They don't have enough space to operate on anymore."

Late last year, the province issued an order requiring the company to remove all compost from its site due to the environmental impacts from the composting operations. Facilitator Reg Toews was brought in to help Samborski move.

"It was clear that they have no idea or plan on how they want to move forward," Toews said in his final report to the province.

Samborski attempted to use a 75-acre section of land adjacent to the city's Brady Road Landfill in the RM of Macdonald, but the RM turned him down three times.

The City of Winnipeg offered to lease him land inside Brady Road Landfill, but Samborski turned it down.

The company collects kitchen scraps and yard waste from homeowners and composts animal waste from the Assiniboine Park Zoo and Assiniboia Downs. It also collects



Lenn Samborski

MANITOBA

Peat-mining loophole irks wilderness group

By Larry Kusch

AN environmental group is decrying the rush to mine peat in the Riverton area near Lake Winnipeg.

The Wilderness Committee said new peat-extraction proposals are continuing to pop up in the area despite a 2010 provincial ban on new quarry leases. That's because peat-mining companies already held numerous leases before the NDP government's Save Lake Winnipeg Act was proclaimed.

Sunterra Horticulture (Canada) Inc., recently applied for an Environment Act licence to expand its operations to the Bullhead, Little Deer Lake and Ramsay Point bogs about 40 to 80 kilo-

metres north of Riverton. The company said it needs the new mines because its nearby Beaver Point bog is nearing the end of its productive life.

"Without the proposed development, Sunterra will either have to drastically reduce its workforce and investments within Manitoba and/or seek out resources in other provinces," the company said in a submission to the government in December.

There are several new peat-mining operations planned for the area east and north of Riverton, prompting the Wilderness Committee's Eric Reder to dub it the "peat rush."

"This entire peninsula is covered with quarry leases," Reder said Friday.

Another company, Sun Gro Horticulture, sparked controversy earlier this

year when it applied to develop a peat mine inside Hecla Grindstone Provincial Park. The province is expected to announce its decision on that project this fall, while also weighing appeals on the granting of licences for two other mines in the area.

Environmentalists are critical of peat mining because they say the process releases substantial amounts of greenhouse gases. There are also worries peat mining near Lake Winnipeg will exacerbate the water's nutrient problems. Meanwhile, the area around the proposed Sunterra mines is said to be prime moose habitat.

Heather Hinam, a naturalist and Hecla/Grindstone cottage owner, has organized an online petition against the proposed Sunterra expansion. Ear-

lier this year, she also helped organize opposition to Sun Gro's planned mine. "I see it as a short-sighted cash grab that's going to have a long-term (environmental) impact," she said of the proposed peat mines.

Conservation and Water Stewardship Minister Gord Mackintosh was unavailable for comment on Friday.

The province is accepting comments from the public on the proposed Sunterra mines until Tuesday. Anyone wishing to weigh in on the company's proposals can email Darrell Ouimet, a provincial environmental officer, at darrell.ouimet@gov.mb.ca.

larry.kusch@freepress.mb.ca

SEE MAP AT WINNIPEGFREEPRESS.COM

July 24, 2012

Hand Delivered



Darrell Ouiment
Environment Officer
Environmental Assessment & Licensing Branch
Manitoba Conservation
123 Main Street, Suite 160
Winnipeg, MB R3C 1A5

Subject: Comments on the Sunterra Peat Mine Development, Manitoba Environmental Act Proposal (EAP), Final Report dated December 2011, File No. 4252.1

- Reference:
- 1) Sunterra Peat Mine Development, Manitoba Environmental Act Proposal (EAP), Final Report dated December 2011, File No. 4252.1
 - 2) Initial Comments and Concerns regarding the Proposed Sunterra Peat Mine Development Expansion into Ramsey Point, Deer Lake and Bull Head Bogs dated November 7, 2011.

Dear Darrell

The Pebblestone Beach Cottagers are a group of new cottage lot owners in the Pebblestone Beach area, which is a new cottage development along Lake Winnipeg established by Manitoba Conservation. The Pebblestone Beach Cottage Development is approximately 40 km north of Riverton on PR 234 within 1 km of the proposed peat mine and will be significantly impacted by the socio-economic and cumulative effects of the proposed development.

The Pebblestone Beach Cottagers are strongly opposed to this Proposed Sunterra Peat Mine Development and any other Peat Mine Development along Lake Winnipeg including the Sun Gro Hay Point Peat Mine, the Sun Gro Ramsey Point Peat Mine and the Berger Peat Moss Peat Mine developments.

The following outlines our summary comments and concerns on the environment effects and the environmental assessment methods.

Environmental Effects Comments and Concerns:

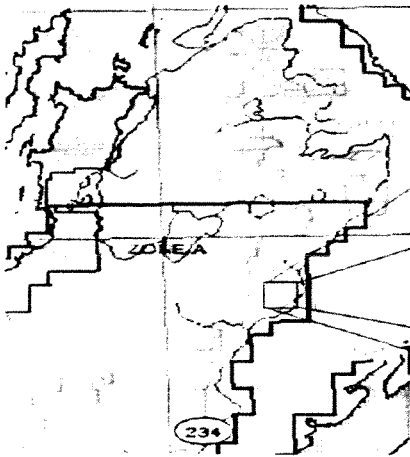
- Traffic – We are concerned about the increased truck traffic on gravel PR 234. The proposed mine will increase the truck traffic on gravel PR 234 by 34 trucks per day. When the Ramsey Point and Deer Lake Peat mines are in operation the truck traffic will increase to 130 trucks per day. This increased truck traffic will further impact on the local and regional community in terms of dust, noise, vibration and safety. It will also further degrade the condition of the gravel highway, which has a further impact on community safety. Although previous EAPs expressed support for road upgrades there is no clear commitment by either the peat mining community or Manitoba

Infrastructure and Transportation (MIT) on what specifically will be done, when it will be done and who will do it. All of the proposed measures are already in place today and do not effectively mitigate the impacts caused by the existing Sunterra truck volumes of 20 trucks per day. More effective solutions would be to black top the road, install a separate mine road, put in sound barriers and/or move peat mine access away from the local or regional communities. These solutions were suggested to KGS in writing but they were not included in the proposal.

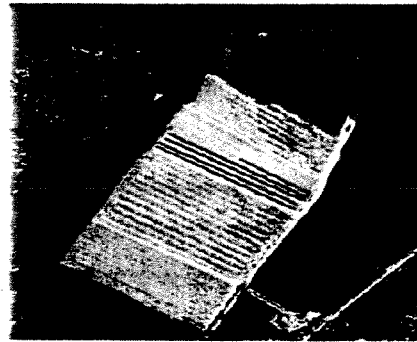
- Fugitive Dust- We are very concerned that the increased fugitive dust from the mine operation may affect the breathing of the local inhabitants. Several individuals in the local cottage areas have dust allergies and asthma. Increased fugitive dust can cause breathing difficulties and trigger asthma attacks. The fugitive dust effect will be further increased by the existing, proposed and potential peat mines. A quantitative air quality analysis should be done to truly understand incremental and cumulative human health risk in the local and regional area. We made this recommendation to KGS in writing but it was not included in the proposal.
- Green House Gas Emissions – We are concerned about the amount of GHG emissions released into the atmosphere by this peat mine and the other peat mines in the area. This peat mine will release approximately 7.8k tons/year of CO₂e emissions into the atmosphere over the next 30-40 years. With the Ramsey Point, Deer Lake and Hay Point a total of 35.9k tons/year of CO₂e emissions will be released into the atmosphere for the next 40-50 years. This represents a 0.164% increase in Manitoba's CO₂e emissions (21.6M tons/year in 2008). The decision to proceed with these mines also goes against the Kyoto protocol commitment which is to reduce Manitoba's CO₂e emissions to 6% below 1990 levels. Without these mines we are already up 10% from 1990 levels. With these peat mines we will be at 10.2%. If we include CO₂e emissions related to peat decomposition (71%), the total CO₂e emission would be 123.8k tons/year which is equivalent to 0.56% of the provincial total per year. These peat mines are moving us in the wrong direction. No further increase to GHG emission should be tolerated or allowed. This peat mine should not be allowed to proceed on this basis alone. We suggested to KGS in writing that a quantitative GHG emissions analysis should be done to truly understand incremental and cumulative effect on Air Quality but it was not included in the proposal.
- Surface Water – We are concerned about the suspended pH, nutrients and chemistry of surface water in the receiving water, particularly Lake Winnipeg. The water draining from these peat bogs are more acidic than the receiving water in Lake Winnipeg and in some cases above MWQSOG and CCME criteria. They have nutrient levels slightly higher than Lake Winnipeg and contain elevated levels of aluminum, cadmium, iron and lead above acceptable criteria. Some studies indicate that peat bogs also sequesters/produces Mercury and the drainage water may contain elevated levels of Mercury as well. Unlike the proponent, we believe that drainage water in this condition should not be allowed to flow into Lake Winnipeg, despite its large relative size, because pH, nutrients and chemistry in the surface water from this peat mine and other sources such as the Ramsey Point, Deer Lake and Hay Point peat mines cumulate and have an adverse effect over time. This is particularly true for Lake Winnipeg because of its known health issues. A quantitative cumulative effects analysis should be performed to understand the cumulative effect of surface water from all potential and proposed peat mines in the area. The decision to proceed with these mines also goes against the Save Lake Winnipeg Act and the government's objective to reduce Lake Winnipeg nutrients by 50%. This peat mine and all recently proposed peat mines had elevated pH, nutrient and

chemistry levels. These peat mines are moving us in the wrong direction. No further increase in any of these levels should be tolerated or allowed. This peat mine or any other peat mine should not be allowed to proceed on this basis alone.

- Soil – We are concerned about the extent of soil loss and the time it will take to restore the land to its original condition. This expansion represents another 1300 hectares or 16M cubic meters of soil lost to peat mining. When you add this to the Ramsey Point, Deer Lake and Hay Point (proposed) peat mine developments, approximately 6100 hectares or 96M cubic meters of soil will be lost to peat mines. When you add the potential peat mine developments with leases a total 10,000 hectares or 150M cubic meters of soil will be lost to peat mines. When you add the remaining proposed or potential peat mine developments with pending leases a total of 15,000 hectares or 225M cubic meters of soil will be lost to peat mines. This represents 22% of the land in the Washow Bay Peninsula area. When viewed from the air it will look like the surface of the moon until it is restored. See Figure 1. Restoration of Peat Land is not an exact science and there are different opinions on whether it can be done effectively or at all.



Washow Bay Peat Mines (15,000 ha)



Loss of Soil at Sunterra (380 ha)

Figure 1 – Loss of Soil

- Wildlife Habitat – We are concerned with the extent of loss and disturbance of wildlife habitat. This habitat is home to some rare species such as the leopard frog and the olive-sided flycatcher, which will likely be lost. It is also prime habitat for the moose and losing it will also further stress the moose population. The extent of the loss and disturbance will also drive wildlife onto PR 234 and local communities increasing the likelihood of vehicular incidents and negative human interactions.
- Vegetation – We are concerned with the extent of loss and disturbance of vegetation. The proponent simply directs attention to the existence of other undeveloped areas supporting unique vegetative types and concludes the effect is minimal. However, if the all the proposed and potential peat mines were allowed to proceed the amount of undeveloped areas to support rare or unique vegetation types will be significantly reduced and the effect will no longer be minimal. This habitat is home to some rare species such as the Manitoba Orchid. Transplanting has proven not to be effective. Attempts have failed in the past. Other mitigating measures need to be identified.
- Economic Conditions - We believe that there is an overall decrease in economic conditions in the local and regional area as a result of the peat mines. The value of

the recreational and residential property in the area are sure to decrease when potential buyers learn that they are located close to a major peat mine facility with all its negative environmental effects. The reduced quality of recreational life will make the area less desirable for recreational users and residents and tourists causing a decline in cottagers, residents and tourism and related economy. There is a risk that the altered sediment, nutrients, pH and chemical levels in the Lake Winnipeg over an extended period of time may start to affect the fish habitat and reduce fish population and fishing economy. The peat leases and royalty revenues paid to the province will not cover the additional road maintenance cost that will be incurred to accommodate the increased truck traffic. The cost not covered by the lease and royalty revenues will have to be covered by the tax payers. Why are putting a \$20M+ per fishing economy and a \$3M+ per year cottage economy at risk for a \$1M+ peat industry potentially at the cost of the taxpayers. Peat mines should not be allowed to proceed on this basis alone.

- Business Opportunities – While there will be business opportunities for local contractors related to peat mine construction and operation, we also believe that there is going to be an equal and opposite effect on business opportunities for local contractors related to recreation and residential construction and operation. The construction and operation of the proposed peat mine will affect the expected quality of recreational life and make the area less desirable for recreational and residential users. This will likely result in fewer smaller cottages and eliminate any possibility for larger permanent residents, which in turn will reduce the construction and operation opportunities for local contractors. This situation will further worsen if the other proposed and potential peat mines in the regional area are allowed to proceed.
- Noise and Vibration – The noise and vibration generated within the mine site will be slightly buffered by the buffer zone of trees between the mine and the cottage development areas and your typical noise muffling techniques. However, we are concerned that the noise and vibration generated by the transport truck driving on PR 234 and entering/exiting the mine access will be significant. The majority of the noise generated by transport trucks driving on PR 234 is caused by the gravel hitting the undercarriage of the truck. The noise generated by the trucks entering the mine access is primarily caused by brake and engine noise when they stop and accelerate at the mine access. Mitigation measures such as black topping PR 234 Road, erecting sound barriers, installing separate mine roads, moving mine access away from cottager, recreational and residential areas needs to be considered.
- Fires and Explosions – We are concerned that the fire hazard and mitigation approach will address workplace hazards and not hazards that the mine imposes on the local communities. The Riverton fire department is 1 hour away – a peat fire at the mine site could quickly overtake our community within that time frame. The cottager and communities only has one road out of the development. Some cottagers are within 1 kilometer of a peat mine. Extreme diligence is therefore required to monitor and assess the risk of fire to the community. Who will be on-site to monitor for fires in the mining area on evenings and weekends when mining staff have gone home for the day/weekend? We also note that the proposed size of the mine is 1300 Hectares once in full operation. What mitigation will be in place for fires that threaten an area greater than what regular fire suppression will be able to address? The impact of potential fires and explosions to the local communities and cottagers needs to be included in any assessment. As well, the cumulative effect of the entire area under all the local mining proposals needs to be included in any assessments. We suggested KGS in writing that this be addressed in the proposal but it was not included.

- Conflicting Interests – We believe the conflict between stakeholders interests in the area is the root cause of the problem we find ourselves immersed in today. Industry areas are areas are not compatible with recreational or residential areas and they should not be co-located. Whenever these areas are mixed there will inevitably be incompatibilities and problems. When the areas of interest acquired their land from the Crown they expected an environment that was pristine and serene cottage and recreational area. Instead they are now going to have to endure chaos, noise, vibration, workers, transport trucks, dust, industry, pollution, reduced wildlife and vegetation, increased risk of vehicular and wildlife incidents and intimately a big lifeless 1300 hectare hole. This is worse than any of us currently experience at our city residence. The area is predominately a residential/recreational area and the government needs to recognize and reinforce thero previous decision to make this recreational and residential area by prohibiting peat mines in the area. We also believe that Manitoba Conservation is in the role of the developer and should ensure that the concerns and interests of the cottage developments are considered. There needs to be a balance between the interests – based on our discussions and experience the balance favors the peat mines

Environmental Assessment Methods Comments and Concerns:

- The Environmental Act states that Manitoba Conservation recognizes the value of public participation and provides several opportunities for public participation including public comment as well as public meetings or hearings if public concern or interest warrants. The advertisement for public comment has occurred and was much improved. However, because of the recent media attention and level of public concern we believe a public meeting is also warranted and should be held in accordance with the Environmental Act.
- It is not clear how effectively the proposed mitigating measures will reduce the impact. The mitigating measures should be evaluated to ensure they adequately reduce the impact to an acceptable level by comparing the inherent adversity rating (before mitigating measures) with the residual (after mitigating measures) using the same rating scheme.
- Most of the environmental effects are stated in qualitative terms. The inherent and residual environmental effects should be quantified so it is not clear from the proposal what the true environmental impact is or how effective the proposed mitigation measures will be.
- The significance of the environmental effects is evaluated in terms of high-level global environmental long term impacts. The rating scheme used to evaluate the significance of the environmental effects should be adjusted to consider regional or local short and long term effects.
- The cumulative environmental impacts were not quantified and only included 8.6% (1,300 hectares of 15,000 hectares) of the existing, proposed and potential peat mines in the entire Washow Bay area. The environmental assessment should identify, quantify and address the cumulative environmental impact of all 15,000 hectares of existing, proposed and potential peat mines in the entire Washow Bay area.
- The Environment License Act Branch has advised that although a cumulative environment impact analysis is included in the EPA it is not included as part of the review and decision process. When asked why the provincial process does not consider the cumulative effect in the review, which is advocated by the Canadian Environment Assessment Agency. The answer was simply "it is not part of the

provincial process so we don't do it". We believe this is a fatal flaw in provincial environment assessment process. You can not effectively assess the impact to environment if you assess each peat mine separately without considering the cumulative effect of all the peat mines. We hope that there is more to the provincial environmental assessment than simply following the process. The cumulative effect assessment needs to be considered as part of the environment impact review and decision.

Our detailed comments, concerns and recommendations are provided in Attachment A for your review.

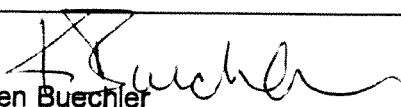
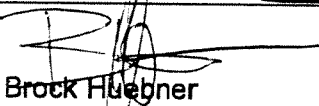
While we recognize we are not the experts, we do believe that there is enough evidence provided here to conclude that the peat mines will have harmful environmental and economic impacts that can not be effectively, practically or affordably mitigated, and should be prohibited and not allowed to proceed. We are confident that if you and your team were to look at this evidence objectively you would reach the same conclusion.

We thank you for the opportunity to provide our comments and concerns and look forward to your response to our comments and concerns.

We request that you keep us advised on the status of your response to the EAP comments and concerns and specifically ask that you advise us when you have posted them for public review.

Please contact Ken Buechler (204)-895-7766 if you have questions or require further clarification regarding these comments and concerns or potential mitigating measures.

Respectfully yours,

Bit Fox Mercedes Alcock Pebblestone Beach [REDACTED]	 Ken Buechler Pebblestone Beach [REDACTED]
 Brock Huebner Pebblestone Beach [REDACTED]	Bit Fox Ralph Kamieniarz Pebblestone Beach [REDACTED]
Bit Fox Ajay Kaushal Pebblestone Beach [REDACTED]	Bit Fox Geraldine & Keith Selkirk Pebblestone Beach [REDACTED]

Attachment A

Detailed Comments, Questions and Concerns on the Proposed Sunterra Peat Mine Development

The following are detailed comments, concern and questions on the Sunterra Peat Mine Development Manitoba Environment Act Proposal submitted on behalf of the Pebblestone Beach Cottagers.

Section 3.6.1: Outlet Ditches – The proposal states that the Ramsey Point Bog outlet ditch for the sedimentation ponds will discharge to the existing unnamed stream to the existing PR 234 roadside ditch. The roadside ditch conveys the stream discharge south along PR 234 to a culvert crossing for outlet to Lake Winnipeg. It is not clear from this explanation or any of the supporting figures exactly where the unnamed stream intersects the PR 234 ditch, where the culvert crossing and where it will drain into Lake Winnipeg relative to the Pebblestone Beach Cottage development. We are very concerned that this drainage may flow into the ditches within the Pebblestone Beach Cottage Development.

Recommendation:

Clearly identify the location and rate of the run-off flow from the Ramsey Point Bog including any potential run-off through the Pebblestone Beach Cottage Development.

Section 4.3: Economy – The proposal identifies forestry, hunting and trapping and particularly fishing in Lake Winnipeg as important economic sources in the area. The proposal conveniently excludes cottage development and operation as an economic source. Based our analysis the cottage communities are a significant economic source for the area. No economic analysis should be considered complete unless all important and significant economic sources including cottage economy for the area are addressed.

Recommendation:

Identify and include Cottage Development in the economic analysis.

Section 5.4: Mitigating Measures – The section highlights the proponent's responses to the stakeholder comments and concerns identified through public consultation process including responses to the Pebblestone Beach cottager concerns. None of the mitigation measures adequately address the concerns we raised in the reference 2) letter. Our concerns remain and are reiterated in this response.

Recommendation:

Adequately address the comments and concerns.

6.1 Environmental Assessment Methods

The inherent environmental effects of the proposed peat mine were assessed using methods prescribed by the Canadian Environmental Assessment Agency. This method rates each environmental component at a macro level based on whether it affects groups or the population as a whole over generations. For example, a minor rating will effect a specific group of individuals in a population in the project area over a short

period of time (one generation or less) but not effect the integrity of the population as a whole, and moderate rating will effect a portion of the population (localized) over for one or more generations but does not effect the population as a whole. Clearly, this rating scheme is not granular enough to accurately assess inherent or residual impacts on the stakeholders in the area of study during the operation of the mine. This brings into question the proposal's assessment of the inherent environmental effects on local or regional stakeholders in the area of study.

The residual environmental effects of the proposed peat mine were evaluated based methods in the Canadian Standards Association draft environmental assessment standards. Seven criteria were rated to determine the significance of the adverse effect for each environmental component. Each criteria was rated using a qualitative macro level rating scheme based on local, regional, national value over 100 year increments. Four (4) of the seven (7) criteria need to have the worst rating to consider the adverse effect to be significant.

We have two concerns with the method used to rate the residual effect. Firstly, this rating scheme is not granular enough to accurately determine the significance of the adverse effect on the stakeholders in the area of study during the operation of the mine. Again, it brings into question the proposals evaluation of the environmental effects significance to the stakeholders in the area of study. Secondly, the residual rating scheme is significantly different than the inherent rating scheme. When you use different rating schemes you can not do a relative comparison between the inherent (before mitigating measures) and residual (after mitigating measures) effects to determine whether proposed mitigating measures effectively reduce the effect. For this reason we have updated residual environment effect in Table 11 from the original proposal using the same rating scheme used to assess inherent effects. The updated inherent and residual environmental effects are shown in Table 1. The inherent and residual adversity ratings in Table 1 clearly demonstrate that for some of the environmental effects the proposed mitigating measures do not reduce the adversity rating and additional mitigating measure are needed to reduce the environmental effect.

Recommendation:

Reassess the inherent and residual environmental effect using a quantified and more granular rating scheme so that local short-term affect can be properly assessed. Assess the residual environmental effect using the same rating scheme used to assess inherent environmental effects. Reevaluate the effectiveness of the mitigation measure based on residual environmental effects using the adversity.

Section 6.2.1: Loss of Wetlands – We are concerned about the proponent's response to the loss of wetlands. The proponent simply suggests the effect is small in comparison to other areas of wetland loss. Today we only have 380 hectares of hectares of wetland being mined in the Washow Bay area. The proposed peat mine will results in a 4 fold increase in wetland loss in the Washow Bay rear. If all proposed and potential mines were allowed to proceed, approximately 15,000 hectares of wetlands would be lost. That's a 39 fold increase in wetland loss in the Washow Bay area.

Recommendation:

Put a hold on any further peat mine development until a proper cumulative assessment and the pending Provincial Boreal Peat land strategy is completed. Or if allowed to proceed, include a "revoke for convenience" condition that allows the license to be

revoked based on the results of the cumulative assessment and Provincial Boreal Peat land strategy so it clear they are proceeding at their own risk.

Section 6.2.3: Loss of Rare Vegetation – We are concerned about the proponent response to the loss of rare vegetation. The proponent simply directs attention to the existence of other undeveloped areas supporting unique vegetative types and the proposed development has therefore a minimal in effect. If all proposed and potential mines were allowed to proceed, the loss of rare vegetation in the Washow Bay area will further increase. This area is home to some rare species such as the Manitoba Orchid. Transplanting of the orchid has proven not to be effective. Past attempts have failed.

Recommendation:

Do not develop or mine areas with rare vegetation that will not survive transplanting,

6.3.2 Air Quality – Fugitive Dust

The proposal states that fugitive dust will increase during the construction and operation of the mine due to access road construction, clearing, ditching, harvesting storing, loading and transporting. The air quality environmental component has been rated moderate for fugitive dust. This means the increase in fugitive dust will effect the local population over for one or more generations. The types and increase in fugitive dust is not quantified in the proposal.

We are very concerned that fugitive dust may affect the breathing of the local inhabitants. Several individuals in the local cottage areas have dust allergies and asthma. Increased dust levels can cause breathing difficulties and trigger asthma attacks.

The proposal identifies several mitigation measures that may be used but does not quantify the residual impact. Without specifically defining what will be done and the quantifying residual impact it is not clear that they will be effective. There is also no commitment that they will be put in place or when they will be put in place. With the proposed mitigation measures we assessed the residual adversity rating to be moderate (Table 1). Additional mitigating measures are needed to reduce the environmental effect.

Recommendations

Measure existing fugitive dust levels and types. Identify and commit to mitigation measures including black top road and moving access/staging area well south of the recreational and residential area to ensure existing levels are maintained. Quantify the residual dust levels and types to ensure they will effectively reduce levels once in place.

6.3.2 Air Quality – Green House Gas Emissions

The proposal states that green house gas emissions will increase during the construction and operation of the mine due to equipment and vehicle emissions during site preparation, peat harvesting and transporting activities. The Sunterra Bogs will account for a 0.001% increase in the total annual emissions for the country (735M tons/year) and a 0.036% increase in the total annual emissions for Manitoba (21.M tons/year). The air quality environmental component has been rated minor for green

house gas emissions. This means the increase in green house gas emissions will effect the local population for less than one generation.

We do not agree that the Air Quality effect related to greenhouse gas emissions is minor. The hay point peat mine will elevate greenhouse gas emissions in locally regionally and nationally for life of the mine. The Air Quality effect related to greenhouse gas emissions should be upgraded to moderate (Table 1) because it's effect crosses federal boundaries and the green house gas emissions will be elevated for one or more generations.

The air quality effect related to greenhouse as emissions will be further increased by the existing and proposed peat mines at Ramsey Point, Deer Lake, Beaver Point and Bull Head bogs. When all these mines are in operation they will account for a .015% increase in the total annual emissions for the country and a 0.5% increase in the total annual emissions for Manitoba.

These figures do not include green house emissions related to the decomposition of peat harvested from these peat mines. GHG emission related to the decomposition of peat is estimated to be 71% of the total peat mine GHG emissions. When you include peat decomposition these peat mines will increase total annual emissions for the country by 0.05% and increase in the total annual emissions for Manitoba by 1.5%.

The decision to proceed with any peat mines goes against the Kyoto protocol commitment which is to reduce GHG emissions to 6% below 1990 levels. Without these mines we are up 10% and with these mines we will be up at least 10.5% without peat decomposition and 11.5% with peat decomposition. Allowing any peat mine to proceed moves us in the wrong direction. No peat mine should be allowed to proceed on this basis alone.

The proposal identifies several mitigation measures that may be used but does not quantify the residual impact. Without specifically defining what will be done and the quantifying residual impact it is not clear that they will be effective. There is also no commitment that they will be put in place or when they will be put in place. With the proposed mitigation measures we assessed the residual adversity rating to be moderate (Table 1). Additional mitigating measures are needed to reduce the environmental effect.

Recommendation:

Do not proceed with this or any peat mines as they significantly increase GHG emissions goes against the Kyoto protocol commitment which is to reduce GHG emissions to 6% below 1990 levels. We also believe the effects of the GHG emissions cross into federal jurisdiction and this should have triggered an assessment by the Canadian Environmental Agency

6.3.4 Surface Water

The proposal states that the surface water nutrients and chemistry in the receiving water, particularly Lake Winnipeg, will be altered during construction and operation of the mine associated with drainage of water from the peat mine. It states that water draining from the bog will be more acidic than the receiving water in Lake Winnipeg and above the MWQSOG and CCME criteria, and will have nutrient levels are slightly higher

than Lake Winnipeg. It also stated that it contains elevated levels of aluminum, cadmium, iron and lead above acceptable criteria. It then concluded that the adverse environmental effects to the surface water is minor because the volume of drainage water is minimal compared to the volume of the receiving water in the watershed and the receiving water in Lake Winnipeg. The incremental acidic, nutrient and metal levels were not quantified in the proposal. Some studies indicate that peat bogs also sequesters/produces Mercury and the drainage water may contain elevated levels of Mercury as well. Mercury levels were not considered or measured.

Unlike the proponent, we believe that drainage water in this condition should not be allowed to flow into Lake Winnipeg, despite its relative volume, because pH, nutrients and chemistry in the surface water from this peat mine and other sources such as the Ramsey Point, Deer Lake and Hay Point peat mines cumulate and have an adverse effect over time. This is particularly true for Lake Winnipeg because of its known health issues. A quantitative cumulative effects analysis should be performed to understand the cumulative effect of surface water from all potential and proposed peat mines in the area.

The decision to proceed with these mines also goes against the Save Lake Winnipeg Act and the government's objective to reduce Lake Winnipeg nutrients by 50%. This peat mine and all recently proposed peat mines had elevated pH, nutrient and chemistry levels. These peat mines are moving us in the wrong direction. No further increase in any of these levels should be tolerated or allowed. Peat mine should be allowed to proceed on this basis alone.

We do not agree that the unmitigated surface water effect is minor. Without mitigation, the surface water will elevate acidic and metal levels in Lake Winnipeg for life of the mine. The surface water environmental component effect should be upgraded to moderate (Table 1) to reflect the fact that the surface water will be elevated for one or more generations.

The proposal identifies sedimentation ponds as mitigation to control water chemistry. It also states that if necessary a limestone and carbon lined drainage ditch may be installed. Without a limestone and carbon lined drainage ditch installed we assessed the residual adversity rating to be moderate (Table 1).

Recommendation:

Do not proceed with this or any peat mines as they increase pH, nutrients and chemistry in Lake Winnipeg which goes against the Save Lake Winnipeg. Perform a cumulative quantitative analysis to determine how all proposed and potential peat mines will impact surface. Assess mercury levels in the drainage water. We also recommend that the installation of a limestone or carbonate-lined drainage ditch to increase pH of draining bog water be mandatory not optional at the construction phase to eliminate any concern for water pH levels if the mine is allowed to proceed.

6.3.5 Groundwater

The proposal states that groundwater used locally may become contaminated during construction from leaks and accidental spills or releases of other hazardous substances, and although the likelihood of contamination is mitigated naturally by the low permeability clay layer on-site, there is a risk that it may become contaminated through

the well that will be installed on-site. This ground water environmental component effect was rated minor, which means the groundwater contamination will effect the local population for one generation or less. The expected contamination levels and its effect on the local population were not quantified in the proposal.

Although we agree that the groundwater contamination may occur during construction, we also believe the ground contamination is just as likely to occur during the operation of the mine as well. Since the potential for groundwater contamination will last for life of the mine, the ground water environmental component effect should be upgraded to moderate (Table 1) to reflect the fact that the groundwater contamination will effect the local population for one or more generations.

The proposal identifies proper installation of the well, preventing leaks, spills and releases, drip trays secondary containment and an emergency response plan as mitigating measures, but does not quantify the residual contamination levels. The proposal does not specify how these measures will be implemented and without quantifying the baseline and residual contamination levels it is not clear how effective they will be. The proposal also states that the proponent will perform inspections for leak, spill and releases, remediate and record, maintain the emergency response plan and adherence to license conditions.

Recommendation:

Upgrade the ground water rating to moderate to reflect the potential groundwater contamination during life time of the mine. Apply mitigation measures through the life of the mine if the mine is allowed to proceed. Specify how these measures will be implemented and quantify the baseline and residual contamination levels to validate there effectiveness. If the effectiveness of these measures can not be demonstrated, consider alternatives such as shipping water to the site.

6.3.7 Wildlife/Habitat

The proposal states that the preparation and harvesting operation will result in a loss and disturbance of wildlife habitat. It concluded that the adverse environmental effects to the wildlife habitat are minor because there is an abundance of undisturbed habitat.

We are concerned with the extent of loss and disturbance of wildlife habitat. This habitat is home to some rare species such as the leopard frog, which will likely be lost. The extent of the loss and disturbance will also drive wildlife onto PR 234 and local communities increasing the likelihood of vehicular incidents and negative human interactions.

We do not agree that the loss and disturbance of wildlife habitat is minor. The loss and disturbance of wildlife is significant and will last until the habitat is restored. The wildlife/habitat environmental effect should be upgraded to moderate (Table 1) to reflect the fact that the wildlife/habitat will lost and disturbed for one or more generations.

The proposal identifies several mitigating measures to reduce the loss of wildlife and habitat. We concerned that there were no mitigating measures proposed for the increased likelihood of negative human interactions due to the loss of habitat. We are also concerned with the mitigating measures proposed for loss and disturbance of reptiles and amphibians such as the leopard frog. The proposal identifies a 100 meter

vegetation buffer zone around the lakes to mitigate any potential effects of the project on the northern leopard frog. In the Ramsey Point Peat Mine EAP, the Sustainable Resource and Policy Management Branch & Land Programs Branch stated that the 100 meter buffer zone was inadequate and would prefer a 300 meter buffer zone to accommodate migrating habits of the leopard frog and other amphibians. With the proposed buffer zones we assessed the residual adversity rating for loss and disturbance of reptiles and amphibians to be moderate (Table 1). A larger buffer zone is needed to reduce the environmental effect.

Recommendation:

Increase the buffer zone to 300 meters as a minimum if the mine is allowed to proceed. Identify and implement mitigating measures proposed for the increased likelihood of negative human interactions

6.4.1 Economic Conditions

The proposal states that the peat mine will create seasonal and permanent jobs for local residents. This socio-economic effect was rated positive. However, the actual economic value was not quantified.

While we agree that peat mine development will improve economic conditions by adding local, supporting local business and contracting work services. We also believe that the peat mine will have an equal and opposite effect on other areas of the local economy for the following reasons:

- 1.) The value of the recreational and residential property in the area are sure to decrease when potential buyers learn that they are located within several kilometers of a major peat mine facility with all it's negative environmental effects. The recreational and residential property value will drop further if the other proposed and potential peat mine in the regional area are allow to proceed.
- 2.) The reduced quality of recreational life will make the area less desirable for recreational users and residents and tourists. This is sure to lead to a decline in cottagers, residents and tourism, which will result in fewer local jobs and reduced support for local business and contract work services. This situation will further worsen if the other proposed and potential peat mines in the regional area are allowed to proceed. Figure 2 provides a rough estimate of the local cottage economy based on estimates based on data from the 2007 cottage lot draw program and discussions with contractors and cottagers in the area.

The cottage community will contribute approximately \$48M for cottage development and \$3.5M annually for cottage operating cost into the local economy. Why are we putting this local cottage economy at risk for a \$1.5M local peat economy. The cottage development program and related economy is clearly a Manitoba Conservation success story that should be protected, promoted and expanded further.

Cottage Development	Number of Cottages	New Cottages	Lot Revenue	New Cottage Construction Cost	Avg Operating Cost/ Year
Islandview	22	22	\$ 218,000	\$ 2,640,000	\$ 110,000
Little Deer	120	120	\$ 3,120,000	\$ 14,400,000	\$ 600,000
Mill Creek	71	71	\$ 1,506,000	\$ 8,520,000	\$ 355,000
Pebblestone	12	12	\$ 240,000	\$ 1,440,000	\$ 60,000
Beaver Creek	50	0	\$ -	\$ -	\$ 250,000
Grindstone	412	138	\$ 88,500	\$ 16,560,000	\$ 2,060,000
Total	687	363	\$ 5,172,500	\$ 43,560,000	\$ 3,435,000

Figure 2 – Local Cottage Economy

- 3.) Drainage water from the peat mines is expected to alter sediment, nutrients, ph and chemical levels in the Lake Winnipeg. It is not clear what the impact will be when all the existing and proposed peat mines are draining water into Lake Winnipeg because a cumulative review of all existing and proposed peat mines has not been performed. Lake Winnipeg is already a sick lake. Adding anything to the Lake will make it worse. We believe there is a risk that these increased levels over an extended period of time may start to affect the fish habitat and reduce fish population. Reduced fish population would be devastating to the local and regional fishing. Why are we putting a \$20M+ fishing economy at risk for a \$1M+ local peat industry economy?
- 4.) At peak production, the province revenue is expected to be \$33,850 per year through peat leases (\$10,000/yr) and royalties (\$23,850/yr). The province revenue will not cover the increased PR 234 maintenance/improvement based on our discussion with MIT and the maintenance cost experience on PR 234. How will the extra maintenance cost covered? Will the tax payers pay? The peat mine will generate approximately \$3M revenue per year during peak. Why doesn't the peat mine company pay?

In summary, we are very concerned that the tax payer may end up investing in infrastructure to support the profitability and revenue growth of the peat mine industry, which causes a net degradation in the local and regional fishing and cottage economy. This is not an acceptable business or economic plan.

Recommendation:

Conduct an economic analysis to ensure that the introduction of peat mine developments does not result in an overall degradation to the local or regional fishing and cottage economy or additional cost to the tax payers. The province should also cut it's loses and seriously consider buying out the peat mines leases, which at this time is

estimated to be \$30,000. It will be cheaper than the cost of expected annual increase in the maintenance cost on PR 234 in the first year.

6.4.2 Business Opportunities

The proposal states that the peat mine will provide additional business opportunities for local contractors related to peat mine construction and operation. This environmental effect was rated positive. The value of the business opportunities was not quantified.

While we agree with the business opportunities for local contractors related to peat mine construction and operation, we also believe that there is potentially an equal and opposite effect on business opportunities for local contractors related to recreation and residential construction and operation. The construction and operation of the proposed peat mine will affect the expected quality of recreational life and make the area less desirable for recreational and residential users. This will likely result in fewer smaller cottages and eliminate any possibility for larger permanent residents and will reduce the construction and operation opportunities for local contractors. This situation will further worsen if the other proposed and potential peat mines in the regional area are allowed to proceed.

Recommendation:

Reassess the business opportunities considering the reduction in cottage and residential construction and operation opportunities.

6.4.3 Traffic

The proposal states that the peat mine will result in increased traffic on PR 234. At peak production 12 truckloads or 24 truck trips per day would be required to transport packaged peat on PR 234 from the processing plant to market. Once the harvestable area at Ramsey Point bog is opened and additional 5 truckloads or 10 truck trips per day would be required to transport raw peat from Ramsey Point bog to the processing plant. The total truck traffic on PR 234 by the Pebblestone Beach cottage development is 17 truckloads or 34 truck trips per day. It further stated that the increased truck traffic will increase dust, further degrade the road, and increase the risk of vehicle accidents and road kill. The traffic environmental component has been rated moderate. This means the increase traffic will effect the local population over for one or more generations. The local environmental effects of the increased traffic levels were not quantified.

Despite best efforts and significant expense, Manitoba Infrastructure and Transportation (MIT) can not maintain PR 234 to keep up with existing truck traffic levels from the Sunterra Beaver Point mine. Within days after the road is either dust treated, bladed and dragged the ruts, potholes and wash boarding on corners and poor visibility due to dust levels return. These conditions make driving dangerous and will cause accidents. Based on discussion with MIT, current maintenance cost on PR 234 is approximately \$400K per year (above standard), which includes blading, several gravel applications and one (1) dust control application per year. MIT believe the additional truck traffic will require additional maintenance and potentially strengthening but they did not know how much more or how effective it will be.

The proposal identifies dust control, drive the speed limit and driving during daylight hours as mitigation measures. These mitigation measures are used today on PR 234 and have limited effect.

The MIT has proposed to monitoring traffic levels, public complaints and vehicle accidents. However, it should already be clear from our experience with Sunterra Peat Mine on PR 234, that further needs to action needs to be take right away.

With the proposed mitigating measures we assessed the residual adversity rating to be moderate (Table 1). Additional mitigating measures needed to reduce the environmental effect.

Recommendation:

Consider more effective mitigation measures such as black topping the road, traffic lights, reduced speed limits, installing sound barriers, installing separate mining truck roads and relocating mine access road so that existing traffic effects are not affected. Include these mitigating measures in Manitoba's Highway Renewal Plan and as license conditions that must be implemented prior to any peat mine development.

6.4.4 Noise and Vibration

The proposal states that there will be an increase in noise and vibration level in the local area. The noise and vibration is caused by use of heavy equipment and transport truck during construction and operation of the mine, as well as the transport trucks driving along PR 234. The noise and vibration environmental component was not quantified but was given rated minor. This means the increase traffic will effect the local population over for one generation or less.

We agree that the noise and vibration generated within the mine site will be slightly buffered by the buffer zone of trees between the mine and the cottage development areas. However, the noise and vibration generated by the transport truck driving on PR 234 and entering/existing the mine access will be significant and last for one or more generations. For this reason, we believe the inherent adversity rating for noise and vibration to be moderate (Table 1).

The proposal identifies muffling vehicles and equipment, limiting idling and maintaining vehicle as mitigating measures, but does not quantify the residual noise and vibration levels. Without quantifying the baseline and residual noise and vibration levels it is not clear how effective the proposed mitigating measure will be. While we agree these measures may further reduce vibration and noise level within mine, these mitigating measures will not mitigate noise and vibration levels generated by transport truck driving on PR 234 and entering/existing the mine access. The noise generated by transport trucks driving along PR 234 is primarily caused by the gravel hitting the undercarriage of the truck. The noise generated by the trucks entering the mine access is primarily caused by brake and engine noise when they stop and accelerate at the mine access. Additional mitigation will be required to mitigate these noise sources.

The MIT also proposes to monitor noise and vibration levels and public complaints. Again, it is already clear from the noise and vibration levels at the Sunterra Beaver Point peat mine that definitive action needs to be taken.

With the proposed mitigating measures we assessed the residual adversity rating to be moderate (Table 1). Additional mitigating measures needed to reduce the environmental effect.

Recommendation:

Move the mine border or eliminate sections to mitigate noise and vibration caused by the mine operation. Black topping the road and erect sound barriers around affected areas to mitigate the noise and vibration caused gravel hitting the undercarriage of the truck. Relocate the mine access road further away from affected areas and erect sound barriers around the cottage and recreational areas to mitigate noise and vibration caused by trucks entering and exiting the development site. These mitigating measures should be accommodated as license conditions and included in the Manitoba's Highway Renewal Plan to ensure there is commitment to make them happen.

6.4.5 Human Health

The proposal states that the human health of the local population will be affected due to increased noise, vibration, dust and collision risk by the increased traffic. This human health environmental component effect was rated moderate, which means the human health of the local population will be affected for one or more generations. The affect that the increased noise, vibration, dust and collision risk will have on the local population was not quantified in the proposal. We agree with the assessment stated in the proposal.

The proposal identifies the same mitigating measures identified for the Traffic and the Noise and Vibration environmental effects. As previously stated, despite MITs best effort, these mitigating measures do not effectively address current traffic levels from the Sunterra Peat Mine on PR 234.

The proponent also proposes to monitor dust level and public complaints and consider further action if warranted. Monitoring is only delaying the obvious and inevitable. It is already clear from the noise, vibration and dust levels from the Sunterra peat mines that any additional traffic will require definitive action needs to be taken.

With the proposed mitigating measures we assessed the residual adversity rating to be moderate (Table 1). Additional mitigating measures needed to reduce the environmental effect.

Recommendation:

Implement the mitigating measures recommendations identified for the Traffic and Noise and Vibration environmental effects. Specify how these measures will be implemented and quantify the baseline and residual noise, vibration and dust levels to validate their effectiveness. If the effectiveness of these measure can not be demonstrated consider alternatives such as relocating the mine or offering relocation or buy out packages to the cottagers. These mitigating measures should be accommodated as license conditions and included in the Manitoba's Highway Renewal Plan to ensure there is commitment to make them happen.

6.4.7 Areas of Interest

The proposal states that the most of the area is used for recreational purposes and both recreational and year-round residence. It acknowledges the recreational facilities and residences as well as the natural environment are areas of interest. It then concludes that area of interest impact will be moderate, which means it will have local impact that will last for one or more generations. We agreed with this assessment.

The proposal identifies limiting construction activities to designated areas, marking maximum clearing width of the proposed development site, protecting trees from blow down and reusing timber from clearing. With the proposed mitigating measures we assessed the residual adversity rating to be moderate (Table 1). Additional mitigating measures needed to reduce the traffic, health, noise and vibration impact on the areas of interest.

We believe that the conflict between stakeholder interests in the area is the root cause of the problem we find ourselves immersed in today. Simply put, Industry areas are not compatible with recreational or residential areas and they should not be co-located. Whenever these areas are mixed there will inevitably be incompatibilities and problems. That is why city planners create zones and keep operations like peat mines in industrial zones, away from recreational or residential zones. Putting a 500 hectare peat mine next to a existing 400 cottage community would be like putting a 500 hectare gravel pit next to a 400 house residential community. If that was proposed in the city, there would be outrage.

When the areas of interest acquired their land from the Crown they expected an environment that was pristine and serene cottage and recreational area. Instead they are now going to have to endure chaos, noise, vibration, workers, transport trucks, dust, industry, pollution, reduced wildlife and vegetation, increased risk of vehicular and wildlife incidents and intimately a big lifeless 500 hectare hole. This is worse than any of us currently experience at our city residence.

Recommendation:

The goals and desires of an industrial area and a residential/recreational area diametrically oppose each other. The 2 areas can not coexist without problems. The area is predominately a residential/recreational area and government needs to recognize and reinforce their previous decision to make this area a provincial/ park and recreational by prohibiting peat mines in the area.

6.4.8 Recreation/Tourism

The proposal states that the areas surrounding the proposed peat mine to be designated commercial resource/recreation which is intended for recreational and commercial use. It acknowledges the recreational land use along Lake Winnipeg. It then concludes that although the proposed peat mine is not in close proximity to the recreational areas, its effect on the recreational use will be minor due to the traffic generated on Grindstone Road.

We do not agree that the effect will be minor. The road traffic will impact the recreational areas for one or more generations. As such, we recreational/tourism effect is moderate (Table 1).

The proposal identifies several mitigating measures. With these proposed mitigating measures we assessed the residual adversity rating to be moderate (Table 1). Additional mitigating measures needed to reduce the environmental effect.

Recommendation:

Implement the mitigating measures recommendations identified for the Air Quality, Traffic, Health and Noise and Vibration environmental effects. Specify how these measures will be implemented and quantify the baseline and residual noise, vibration and dust levels to validate their effectiveness. If the effectiveness of these measure can not be demonstrated consider alternatives such as relocating the mine or offering relocation or buy out packages to the cottagers. These mitigating measures should be accommodated as license conditions and included in the Manitoba's Highway Renewal Plan to ensure there is commitment to make them happen.

6.5.1 Fires and Explosions

The proposal states that "fires and explosions may result from spontaneous combustion, lightning strikes, equipment malfunctions, improper handling and storage of hazardous materials, as well as various construction and operation activities. Diesel fuel and small quantities of gasoline are stored, transported and dispensed as part of peat harvesting operations. Small quantities of hazardous materials and potentially flammable materials will be stored on-site. Fires and explosions can cause serious harm to staff, construction workers, contractors, the public and the environment. The potential adverse environmental effects of fires and explosions were assessed to be major."

The proposal outlines mitigation measures includes "complying with applicable provincial and municipal legislation, codes and guidelines, providing and testing fire suppression equipment on-site, preparing, exercising and implementing an emergency response plan that includes fire and explosion prevention, notification and response, regular employee training on use of equipment and notifying Manitoba Conservation immediately if a fire or explosion occurs."

We note that these mitigation measures were not included as license conditions, therefore there is nothing binding the mining company from implementing these measures prior to operating the mine.

As property owners and future residents living within the region of the proposed mine site we have the following concerns and questions:

1. The fire hazard and mitigation approach seem to address workplace hazards and not hazards that the mine imposes on the local cottage communities.
2. The Riverton fire department is 1 hour away – a peat fire at the mine site could quickly overtake our community within that time frame.
3. There is only has one road out of the area. Extreme diligence is therefore required to monitor and assess the risk of fire to the community.
4. Who will be on-site to monitor for fires in the mining area on evenings and weekends when mining staff have gone home for the day/weekend?
5. What kind of fire suppression equipment will they have on-site?

6. We note that the proposed size of the mine is 1300 Ha once in full operation. What mitigation will be in place for fires that threaten an area greater than what regular fire suppression will be able to address?
7. What remedies do we have if Sunterra does not fulfill these fire mitigation measures?

Recommendation

The impact of potential fires and explosions to the cottagers needs to be included in any assessment. As well, the cumulative effect of the entire area under all the local mining proposals needs to be included in the risk assessments. Once the risk to life and property of the cottagers is known, a committee composed of representatives from the cottage communities and the proponent can propose mitigation measures. These measures must be included as mining license conditions. Ongoing monitoring and compliance inspections must be conducted by the community-based committee. If all peat mines are allowed to proceed, serious consideration should also be given to establishing a permanent fire department within close proximity of mines during the summer months.

6.7 Cumulative Environmental Effects

The proposal followed the 5-step approach for assessing cumulative environmental effects advocated by the Canadian Environmental Assessment consisting of scoping, analysis, identifying mitigation, evaluating significant and follow-up. The scope included the existing Sunterra peat mine, Sungro Ramsey Point peat mine, Berger Deer Lake peat mine, existing/new cottage development, recreation (hunting, fishing and camping), commercial trucking, airports, Beaver Creek Provincial Park, Beaver Creek Bible Camp, transfer station and PR 234 maintenance and traffic as projects that contribute to the cumulative effect. The cumulative effect of the projects on each environment component was assessed based on how the project overlapped in time and space. The proposal concluded the cumulative effect on most environmental components to be negligible because they overlap in time but do not overlap in space. The 3 exceptions were loss of soil, loss of bird habitat (olive-sided flycatcher) and increased traffic on PR 234. They were assessed as minor as they overlay in time and overlay in time. The cumulative effect that the projects will have on the environmental components was not quantified in the proposal.

We agree with 5-step approach advocated by the Canadian Environmental Assessment and believe it would accurately determine the potential cumulative environmental affects on the environmental components if worse case production capacity at all existing, proposed and potential projects were considered. Unfortunately, the proposal did not include all of the other existing, proposed and potential peat mine developments in the region and did not used the worse case cumulative production capacity to determine the cumulative affects. The Sunterra Peat Mine development represents only 8.6% of the total potential production capacity in the region, which is 15,000 hectares.

Table 2 provides a more comprehensive schedule of the cumulative existing, proposed and potential production in the region based on available information and assumptions reasonable assumptions regarding future production. It includes existing and proposed production by Hay Point (500 hectares), Sun Gro (1700 hectares) and Berger Peat (2500 hectares). It also includes potential production by Tourbieres (2500 hectares) and Premier (800 hectares) with an assumed 2015 production start. The cumulative production schedule shows a cumulative total volume of 134.6M cubic meter of

harvested peat over 50 year period with peaks of 3M cubic meters of harvested peat per year and 125 truckloads per day. The cumulative total volume of harvested peat is 44 times greater than the total expected volume from the existing Sunterra peat mine at Beaver Point and 6 times greater than the total expected volume from the proposed Berger Peat Moss peat mine at Deer Lake. The cumulative harvesting and truckload peaks are 11 times greater than the peaks at the existing Sunterra peat mine at Beaver Point and 6.25 times greater than the peaks expected at the proposed Berger Peat Moss peat mine at Deer Lake. This is a significant increase production and environmental component effects.

The cumulative production does not include potential production expansion by Premier @ Bull Head Bog, Sunterra @ Beaver Point (1320 hectares) and Sun Gro @ Deer Lake (2260 hectares) and Ramsey Point West (1800 hectares). The magnitude of these expansions is equivalent to the proposed production by Sunterra (1310 hectares), Sun Gro (1700 hectares) and Berger Peat (2500 hectares). That would further increase the total volume of harvested peat by 86M cubic meters with peaks of 2M cubic meters of harvested peat per year and 82 truckloads or 160 truck trips per day. The incremental volume of harvested peat is 14 times greater than the total expected volume from the existing Sunterra peat mine at Beaver Point and 2 times greater than the total expected volume from the proposed Berger Peat Moss peat mine at Deer Lake. The incremental harvesting and truckload peaks are 6.7 times greater than the peaks at the existing Sunterra peat mine at Beaver Point and 4.3 times greater than the peaks expected at the proposed Berger Peat Moss peat mine at Deer Lake. Realistically the extended production would likely occur after the proposed Berger Peat and Sunterra production runs are completed so the annual harvesting and truckloads peaks will not increase. However peat production in the region will continue at a significant rate for another 40-50 years starting in the 2045 and ending in the 2100 timeframe.

Most of the environmental components will be directly affected by the production volume. Their environmental effects will be increased 44 times as a result of the cumulative the cumulative existing, proposed and potential production in the region. When you include the potential production expansion at by Sunterra @ Beaver Point and Sun Gro @ Deer Lake and Ramsey Point West the environmental effects will be increased 54 times. It is clear that the cumulative environmental effect is significant. Table 4 shows the cumulative environmental effect increase for each environment component by project based on cumulative factor analysis in Table 3. Wherever possible, we included quantified effects from the proposal. If it didn't exist we included % increases to at least show relative effect. You will see that most the table is populated with % increases which demonstrated how poorly the effects at proposed Deer Lake Peat Mine development are quantified relative the existing Sunterra peat mine.

8.0 Mitigation Summary

The proposal summarizes and categories the mitigation measures identified throughout the proposal.

As previously stated, the proposed mitigation measures are not well defined and the residual effect after mitigation was not assessed or quantified to determine their effectiveness. In some cases it was clear that the proposed mitigation measures were not effective and additional mitigation measures were recommended to reduce or

eliminate the environmental effect. Table 1 summarizes our residual effect assessment and our recommendations for additional mitigation measures.

9.0 Conclusions

The proposal states that the proposed peat mine operation will not result in significant adverse environmental effects. As discussed previously, the significance of the residual environmental effects of the proposed peat mine were evaluated using methods in the Canadian Standards Association draft environmental assessment standards. This rating scheme uses a qualitative macro level rating scheme based on local, regional, national value over 100 year increments and requires four (4) of the seven (7) criteria need to have the worst rating to consider the adverse effect to be significant. This rating scheme is not granular enough to accurately determine the significance of the adverse effect on the stakeholders in the area of study. At a local and regional level, we believe for that the environmental effects will be significant during the operational life of the mine and for many years after.

Based on our review of the Sunterra Point Peat Mine application for the mine permit a license should not be issued for the following primary reasons:

- Not all key stakeholders within the proposed peat mine study area were advised, consulted nor involved in the many assessments that went into the permit application.
- The inherent and residual environmental effects were not qualified so it is not clear from the proposal what the true environmental impact is or how effective the proposed mitigation measures will be.
- The assessment methods evaluated high-level, regional, and global environmental long term impacts but did not adequately identify, quantify and address local short and long term effects. When viewed at the highest levels, the local and regional impacts are significant and will last for generations. (see comments)
- The environmental assessment does not appropriately assess or address the cumulative environmental impact of existing and proposed peat mines in the entire Washow Bay (see Table 4).
- Most of the mitigation measures do not effectively reduce the inherent environmental effect (see Table 1) and other mitigation is required to reduce the environmental effect to acceptable levels.
- The peat mine is located in a Provincial Forest and will affect its natural beauty and waterways for generations. Our access to these natural resources will likewise be affected for generations.
- A moratorium on peat mines on Lake Winnipeg went into effect with the implementation of the "Save Lake Winnipeg Act". While the act does not apply to existing leases this proposal clearly opposes the intent of the act. The proposed mine will add nutrients to the lake which clearly opposes the governments goal to reduce the nutrients in Lake Winnipeg by 50%.
- The peat mine adds GHG emissions to the atmosphere which goes against the provinces Kyoto commitment reduce GHG emissions 6% below 2009 levels.
- The peat mine (\$1.5M per year) will put at risk the thriving fishing (\$20M per year) and cottage (\$3M per year operation/maintenance plus \$48M development) economies. Proceeding with the peat mine is not good for the local or regional economy.

Table 1 – Summary of Mitigation Effectiveness and Additional Mitigation Measure

Environmental Component	Inherent Adversity Rating	Proposed Mitigation Measures	Residual Adversity Rating with Proposed Mitigation	Additional Mitigation Measure	Residual Adversity Rating with Additional Mitigation
Microclimate Changes in airflow, wind speed and snow deposition pattern	Minor	- Install snow fences to control snow deposition on the property if required	Minor	- None	Minor
Air Quality Increased fugitive dust from site preparation, construction, operation and reclamation activities	Moderate	- Use approved dust suppressant - Minimize peat handling activities during high winds - Reduce exposed peat area (harvesting fields and peat stockpiles) to prevailing winds - Control Vehicle speed - Instruct employees on proper harvest equipment operation to minimize dust - Cover loads being hauled from site - Re-vegetate harvested areas - Utilize windbreaks (tree and brush barriers)	Moderate	- Reduce speed limits along PR 234 by all recreational and cottage developments - Install separate mining roads and relocate site access roads - Reduce and follow speed limits - Backstop PR 234 to eliminate dust from traffic - Move mine borders or relocate mine away from the recreational or cottage areas	Minor
Increased levels of greenhouse gases and VOCs from equipment and vehicle emissions during site preparation, peat harvesting, and transporting activities	Minor	- Use low sulfur fuels - Require a high standards of maintenance of equipment and vehicles - Limit unnecessary long-term idling - Use appropriate fuel dispensing equipment	Minor	- None	Minor
Increased release of carbon dioxide into atmosphere from clearing and peat-harvesting	Minor	- Minimize areas cleared - Prepare and implement a reclamation plan that restores the area to a carbon condition	Minor	- None	Minor
Soils Loss and disturbance of surface soil during site preparation and harvesting activities	Major	- Minimize the surface area disturbed - Leave non-commercial peat reserve in place - Prepare and implement a Mine Closure plan to restore the area to natural conditions	Major	- Prohibit peat harvesting or significantly limit peat harvesting volume and duration	Minor (Prohibit) or Moderate (Limit)
Contamination of soils from leaks and accidental spills and releases of fuel or other hazardous substances	Moderate	- Prevent leaks, spills and releases - Provide ULC Certified double-walled fuel storage tanks with spill prevention and leak detection - Require drip trays for equipment - Designate fuel storage and re-fueling areas - Ensure equipment arrives in good condition - Provide spill clean-up equipment and materials - Provide an emergency spill response plan	Minor	- None	Minor
Surface Water Loss of small ponds and intermittent creeks due to site drainage for peat harvesting operations	Moderate	- Minimize the area disturbed - Formalize a drainage plan to maintain the natural drainage patterns - Maintain water levels in adjacent undisturbed land - Prepare and implement a mine closure plan to restore predevelopment water levels	Moderate	- Prohibit peat harvesting or significantly limit peat harvesting volume and duration	Minor (Prohibit) or Moderate (Limit)
Modified surface water runoff flow rate due to site drainage and land profiling activities during construction	Moderate	- None proposed	Moderate	- Prohibit peat harvesting or significantly limit peat harvesting volume and duration	Minor (Prohibit) or Moderate (Limit)
Increased suspended sediment levels in surface water	Moderate	- Direct drainage water into sedimentation ponds equipped with floating booms before discharging by an outlet to existing drainage systems	Minor	- None	Minor
Alteration of surface water chemistry of downstream receiving waters	Moderate (See comments)	- Use sedimentation pond to control the discharge rate of drainage water into the existing drainage system - If necessary install a limestone or carbonate lined drainage ditch to increase pH of draining bog water	Moderate	- Make the installation of a limestone or carbonate-lined drainage ditch to increase pH of draining bog water mandatory not optional	Minor
Contamination of surface water leaks and accidental spills and releases of fuels or other hazardous substances	Moderate	- Prevent leaks, spills and releases - Provide secondary containment for fuel storage - Require drip trays for equipment - Provide spill clean-up equipment and materials - Provide an emergency spill response plan	Minor	- None	Minor

Table 1 – Summary of Mitigation Effectiveness and Additional Mitigation Measure (Cont'd)

Environmental Component	Inherent Adversity Rating	Proposed Mitigation Measures	Residual Adversity Rating with Proposed	Additional Mitigation Measure	Residual Adversity Rating with Additional
Groundwater Containation of groundwater from leaks and accidental spills and releases of fuels or other hazardous substances	Moderate (See comments)	<ul style="list-style-type: none"> Ensure new supply well in staging area is properly sealed at ground level Prevent leaks, spills and releases Provide secondary containment for fuel storage Require drip trays for equipment Provide spill clean-up equipment and materials Provide an emergency spill response plan. 	Minor	- Ship water in	Minor
Vegetation Loss and disturbance of terrestrial vegetation during site preparation and construction	Moderate	<ul style="list-style-type: none"> Minimize loss and disturbance of vegetation Protect vegetation along the perimeter of the cleared areas from blow down Limit construction activities to designated areas Utilize timber removed from site Re-vegetate disturbed or reclaimed areas Ensure workers are aware of rare grass pink orchid outside project area Control dust using approved suppression Curial construction and operation during high wind events Prepare and implement an emergency response plan Provide suppression equipment on site Notify Manitoba Conservation immediately if a fire or explosion occurs 	Moderate	- Prohibit peat harvesting or significantly limit peat harvesting volume and duration	Minor (Prohibit) or Moderate (Limit)
Impairment of vegetation from dust accumulation during operation	Minor		Minor	- None	Minor
Risk of fire during construction and operation	Major		Moderate	- Establish a permanent fire department in close proximity to the mine during summer months	Minor
Wildlife/Habitat Loss and disturbance of wildlife habitat during site preparation activities	Moderate (See comments)	<ul style="list-style-type: none"> Limit construction activities to designated areas Limit operation activities to areas disturbed during construction Re-vegetate disturbed or reclaimed areas Minimize the area of disturbance by limiting construction to designated areas Limit operation activities to areas disturbed during construction Maintain habitat around the QL's Implement a closure plan to restore wildlife habitat Operate trucks during daylight hours Provide wildlife awareness information to drivers Adhere to posted speed limits Beer-proof garbage containers Regular deposit of waste at existing waste facilities Use animal deterrents such as noise-makers, reflectors and scents if required Avoid ponds in the peatland development areas Minimize disturbance of vegetation around ponds with buffer zones Limit construction to designated areas Limit operation activities to areas disturbed during construction Re-vegetate disturbed or reclaimed areas during or after operation Locate Peat mining components away from critical migratory bird habitat Schedule construction activities outside of critical nesting and rearing periods 	Minor	- None	Major
Increased wildlife-vehicle interactions during peat transportation	Moderate (See comments)		Minor	- Reduce speed limits	Minor
Attraction of problems or nuisance animals	Minor		Minor	- None	Moderate
Loss and disturbance of migratory bird and waterfowl habitat	Moderate (See comments)		Minor	- None	Moderate
Disturbance of migratory and other bird nesting during construction and operation	Moderate (See comments)		Minor	- None	Minor
Loss and disturbance to amphibians and reptiles	Moderate (See comments)		Moderate	- Extend the buffer zone around lakes to 300 meters	Minor
Aquatic Biota/Habitat Disturbance to aquatic biota and habitat due to elevated levels of suspended sediment in peatland drainage water	Moderate (See comments)	<ul style="list-style-type: none"> Use settling ponds 	Minor	- None	Minor
Disturbance of habitat due to construction activities involved in installation of culvert crossings	Moderate	<ul style="list-style-type: none"> Follow Manitoba Stream Crossing Guidelines for the protection of Fish and Fish Habitat Follow best management practices Install the culvert such that low flow connectivity is maintained 	Minor	- None	Minor
Economic Conditions Creation of employment and introduction of money to the regional economy	Positive				
New Decline in fishing, recreation & tourism economy with increased infrastructure costs and tax burden	Negative			- Buyout peat mine leases and prohibit peat mining	Neutral

Table 1 – Summary of Mitigation Effectiveness and Additional Mitigation Measure (Cont'd)

Environmental Component	Intermittent Adversity Rating	Proposed Mitigation Measures	Residual Adversity Rating with Proposed Mitigation	Additional Mitigation Measure	Residual Adversity Rating with Additional Mitigation
Business Opportunities					
Creation of jobs and contracts for development construction and operation requirements	Positive	- None	Positive	- None	Positive
New - Creation of jobs and contracts for recreational and residential construction and operation requirements	Negative	- Not addressed	Negative	- Prohibit peat harvesting or significantly limit peat harvesting volume and duration - Implement mitigation measures identified for the other socio-economic effects	Neutral
Increased traffic will cause increased dust	Moderate	- Utilize dust control methods - Reduce speed and follow posted limits - Reduce the number of vehicles traveling during high wind events - Only travel during daylight hours - Provide wildlife information to drivers - Not addressed	Moderate	- Backstop PR 234 - Install separate mining roads and relocate site access roads - Reduce and follow speed limits - Install traffic lights	Minor
Increased traffic will cause increased road kila and vehicular accidents	Moderate	- Not addressed	Moderate	- Backstop PR 234 - Reduce and follow speed limits	Minor
New - Increased traffic will cause increased noise levels	Moderate	- Not addressed	Moderate	- Backstop PR 234 - Reduce and follow speed limits	Minor
New - Increased traffic will cause increased road degradation	Moderate	- Not addressed	Moderate	- Backstop PR 234 - Increase road maintenance	Minor
Noise/Vibration					
Increased noise and vibration levels from construction and operation activities	Moderate (See comments)	- Muffle vehicles and equipment - Limit un-necessary long-term idling - Require a high standard of maintenance for heavy equipment - Not addressed	Moderate	- Move mine borders or relocate mine away from the recreational or cottage areas - Erect sound barriers around the cottage and recreational areas	Minor
New - Increased noise and vibration levels from truck traffic	Moderate (See comments)	- Not addressed	Moderate	- Backstop PR 234 - Reduce and follow speed limits - Install separate mining roads and relocate site access roads	Minor
New - Increased noise and vibration levels from truck braking and accelerating at site access road	Moderate (See comments)	- Not addressed	Moderate	- Backstop PR 234 - Reduce and follow speed limits - Install separate mining roads and relocate site access roads	Minor
Human Health					
Risk of adverse effects on public attitude and general health and well-being due to increased noise, vibrations and dust generated	Moderate	- Utilize dust control methods - Reduce the number of vehicles traveling during high wind events - Drive according to road conditions - adhere to posted speed limits - Operate transport trucks only during daylight hours - Provide adequate ventilation - Ensure a high standard of facility and equipment maintenance	Moderate	- Backstop PR 234 - Install separate mining roads and relocate site access roads - Follow speed limits - Move mine borders or relocate mine away from the recreational or cottage areas - Erect sound barriers around the cottage and recreational areas - None	Minor
Risk of effects to workers health associated with poor indoor air quality from VOCs, carbon monoxide, propane gas, dust and refrigerant	Minor	- Locked gate signed with no trespassing - Warning signs for ditches and ponds - Compliance with Manitoba Workplace, Safety and Health regulations - Develop and enforce standard operation procedure guidelines - Provide training to employees - Ensure visitors have reported in and are accompanied by an employee	Minor	- None	Public - Negligible and Workers - Minor
Potential Threat to public and worker safety during construction and operation activities	Public - Negligible and Workers - Minor	- None	Public - Negligible and Workers - Minor	- None	Public - Negligible and Workers - Minor
Aesthetic Values					
Impaired aesthetic from new infrastructure (access road) and increased dust during peat mine operation from transport trucks	Minor	- Utilize dust control methods and cover loads during transport to and from the site - Re-vegetate the peat fields in accordance with the provisions in the mine closure plan	Minor	- None	Minor
Areas of Interest					
Disturbance and alteration to the moose Creek WMA and Pegasus First Nation CZ	Moderate	- Limit construction activities to designated areas - Mark minimum clearing width of the proposed development site - Protect adjacent trees from blow down - Re-use trees from clearing	Moderate	- Prohibit peat harvesting and compensate peat mines, or - Offer buy out or relocation packages to cottagers	Minor
Recreation/Tourism					
Increased Truck Traffic on PR 234 and resulting dust could cause decline in tourism to nearby recreation	Moderate (See comments)	- Utilize dust control methods - Cover loads during transport to and from the site - Reduce speed and follow posted limits - Drive according to road conditions - Reduce the number of vehicles traveling during high wind events - Only travel during daylight hours	Moderate	- Backstop PR 234 - Install separate mining roads and relocate site access roads - Follow speed limits - Move mine borders or relocate mine away from the recreational or cottage areas - Erect sound barriers around the cottage and recreational areas	Minor

Table 3 – Cumulative Factors Analysis

Cumulative Factor	Baseline Effect (Sunterra @ Beaver Point)		Proposed Projects				Potential Projects			Proposed and Potential Projects Cumulative Total	Percent Increase from Sunterra 2011 levels
	Sungro @ Ramsey Point	Berger Peat @ Deer Lake	Sunterra @ Deer Lake, Bullhead & Ramsey Point	Tourbières-Lumber @ Bullhead & Deer Lake	Premier @ Bullhead	Sunterra @ Beaver Point	Sungro @ Ramsey Point West, Deer Lake & Bullhead				
Number of Operational Sites (Hectres)	1	1	1	2	1	1	1	1	3	11	1100%
Harvested Surface Area (Hectres)	380	2,500	1,300	2,500	800	1,320	4,060	14,180	3732%		
Harvested Volume (Cubic Meters)	4,844,868	39,487,500	16,574,550	36,112,500	12,467,200	16,829,543	65,467,739	214,351,632	4424%		
Annual Harvested Volume (Cubic Meters)	303,150	708,750	394,900	675,000	378,000	394,900	994,500	4,540,550.00	1498%		
Production Lifespan (Years)	27	59	51	57	42	51	74	117	433%		
Total Production Years	27	59	51	57	42	51	74	377	1396%		
Total Truckloads	28,499	232,278	97,497	212,426	73,336	98,997	385,104	1,260,892	4424%		
Total Truck Traffic	56,998	464,559	194,995	424,853	146,673	197,995	770,209	2,521,784	4424%		
Peak Daily Truckloads	11	28	15	26	15	15	67	123	1118%		
Peak Daily Truck Traffic	22	56	30	52	30	30	134	246	1118%		

Table 4 – Cumulative Environmental Effects Increase

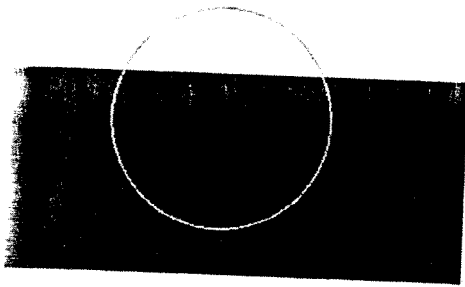
Environmental Component	Existing Sunterra Baseline	Applicable Cumulative Factor	Cumulative Increase from Sunterra Baseline (See Table 3)
Microclimate			
Changes in airflow, wind speed and snow deposition pattern	Not quantified	Surface Area	37x
Air Quality			
Increased fugitive dust from site preparation, construction, operation and reclamation activities	Not quantified	Volume	44x
Increased levels of greenhouse gases and VOCs from equipment and vehicle emissions during site preparation, peat harvesting and transporting activities, construction material and fuel use	Not quantified	Volume & Truckloads	44x
Increased release of carbon dioxide into atmosphere from clearing and peat-harvesting	Not quantified	Surface Area	37x
Soils			
Loss and disturbance of surface soil during site preparation and harvesting activities	Not quantified	Surface Area	37x
Contamination of soil from leaks and accidental spills and releases of fuel or other hazardous substances	Not quantified	Volume	44x
Surface			
Loss of small ponds and intermittent creeks due to site drainage for peat harvesting operations	Not quantified	Surface Area	37x
Modified surface water runoff flow rate due to site drainage and land profiling activities during construction	Not quantified	Volume	44x
Increased suspended sediment levels in surface water	Not quantified	Volume	44x
Alteration of surface water chemistry of downstream receiving waters	Not quantified	Volume	44x
Contamination of surface water leaks and accidental spills and releases of fuels or other hazardous substances	Not quantified	Volume	44x
Groundwater			
Contamination of groundwater from leaks and accidental spills and releases of fuels or other hazardous substances	Not quantified	Volume	44x
Vegetation			
Loss and disturbance of terrestrial vegetation during site preparation and construction	Not quantified	Surface Area	37x
Impairment of vegetation from dust accumulation during operation	Not quantified	Volume & Truckloads	44x
Risk of fire during construction and operation	Not quantified	Volume	44x

Table 4 – Cumulative Environmental Effects (Cont'd)

Environmental Component	Existing Sunterra Baseline	Applicable Cumulative Factor	Cumulative Increase from Sunterra Baseline (See Table 3)
Wildlife			
Loss and disturbance of wildlife habitat during site preparation activities	Not quantified	Surface Area	37x
Loss and disturbance of large, small and burrowing mammals during construction and operation	Not quantified	Surface Area	37x
Increased wildlife-vehicle interactions during peat transportation	Not quantified	Truckloads	44x
Attraction of problem or nuisance animals	Not quantified	Years of Operation	14x
Loss and disturbance of migratory bird and waterfowl habitat	Not quantified	Surface Area	37x
Disturbance of migratory and other bird nesting during construction and operation	Not quantified	Surface Area	37x
Loss and disturbance to amphibians and reptiles	Not quantified	Surface Area	37x
Aquatic Biota's/Habitat			
Disturbance to aquatic biota and habitat due to elevated levels of suspended sediment in peatland drainage water	Not quantified	Volume	44x
Disturbance of habitat due to construction activities involved in installation of culvert crossings.	Not quantified	Number of Operational Sites	11x
Economic Conditions			
Creation of employment and introduction of money to the regional economy	Not quantified	Volume	44x
Value of residential and recreational properties	Not quantified	Volume	44x
Business Opportunities			
Creation of jobs and contracts for development construction and operation requirements	Not quantified	Annual Volume	15x
Creation of jobs and contracts for recreational and residential construction and operation requirements	Not quantified	Annual Volume	15x
Traffic			
Increased traffic will cause increased dust.	Not quantified	Peak Daily Traffic	11x
Increased traffic will cause increased road kills and vehicular accidents	Not quantified	Volume	44x
Increased traffic will cause increased noise levels	Not quantified	Peak Daily Traffic	11x
Increased traffic will cause increased road degradation	Not quantified	Volume	44x
Noise/Vibration			
Increased noise and vibration levels from construction and operation activities	Not quantified	Volume	44x
Increased noise and vibration levels from truck traffic	Not quantified	Peak Daily Traffic	11x

Table 4 – Cumulative Environmental Effects (Cont'd)

Environmental Component	Existing Sunterra Baseline	Applicable Cumulative Factor	Cumulative Increase from Sunterra Baseline (See Table 3)
Human Health			
Risk of adverse effects on public attitude and general health and well-being due to increased noise, vibrations and dust generated	Not Identified	Volume	44x
Risk of effects to workers health associated with poor indoor air quality from VOCs, carbon monoxide, propane gas, dust and refrigerant	Not Identified	Volume	44x
Potential Threat to public and worker safety during construction and operation activities	Not Identified	Volume	44x
Aesthetic Values			
Impaired aesthetic from new infrastructure (access road) and increased dust during peat mine operation from transport trucks.	Not Identified	Number of Operational Sites	11x
Areas of Interest			
Disturbance and alteration to the moose Creek WMA and Peguis First Nation CIZ	Not Identified	Surface Area	37x
Recreation/Tourism			
Increased Truck Traffic on PR 234 and resulting dust could cause decline in tourism to nearby recreation	Not Identified	Peak Traffic	11x



Peguis First Nation

P.O. Box 10
PEGUIS RESERVE, MANITOBA ROC 3JO
Telephone: (204) 645-2359 Toll Free: 1-866-645-2359 Fax: (204) 645-2360
Website: www.peguisfirstnation.ca

July 23, 2012

Honourable Gord Mackintosh
Minister of Conservation & Water Stewardship
330 Legislative Building, 450 Broadway
Winnipeg, MB R3C 0V8

Tracey Braun, Director Environmental Approval Branch &
Darrell Ouimet, Environment Officer
Manitoba Conservation, Environmental Approvals
123 Main St Suite 160,
Winnipeg MB R3C 1A5



Dear Minister Mackintosh:

Re: Public Registry File #4254.10 - Sunterra Horticulture Inc. - Sunterra Peat Mine Development

Peguis First Nation is objecting to the renewal of peat quarry leases, granting of any pending peat quarry leases, and the proposal for another peat mine expansion – Public Registry file #4254.10, Sunterra Horticulture Inc. This proposal affects our rights, our lands and waters, while also contradicting the Crown's intention to consult in a meaningful manner.

We expect you to make sure that notification regarding lease applications or renewals, license applications, response to correspondence from our First Nation, and meaningful consultation occurs before any further leases or licenses are approved. To date there has been no accommodation or compensation to our First Nation for existing peat leases or mines, either.

One of our concerns about the effect on the lands and waters, and peatland environmental services, is that it appears no combined or cumulative assessment by your experts regarding expansion of peat mining in our TLE Notification Zone, and Peguis First Nation Traditional Territory. We also wonder whether the application of the consultation policy for Aboriginal Peoples means that our concerns about the environmental impacts, risks to water, species, and habitat from peat mining are ignored in your departments' process.

Decimation of the peat bogs goes against stated provincial objectives in regards to moose management. This affects us as First Nations people in our ability to harvest moose as traditional food. If moose populations cannot bounce back it will have a very negative effect on our traditional harvesting practices. All moose habitat must be managed sustainably.

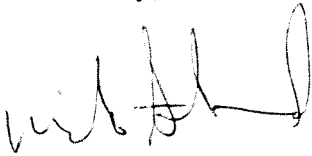
There are also many traditional medicines and berries in these bogs and their loss will hamper our traditional practices in these peatlands.

We are particularly concerned about a new pattern – that is the issuing of peat leases and peat expansion in the vicinity of Lake Winnipeg. Surely this contradicts all your Government's intentions to return the lake to its former state of health and function.

We also would like to see a complete stop to any possible peat leases inside parks, crown land designations, and protected areas.

Peguis First nation is formally communicating our objections to the proposal by Sunterra Horticulture Inc. File #4254.10.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Sutherland". The signature is fluid and cursive, with a large loop at the end.

Mike Sutherland
Councilor Peguis First Nation

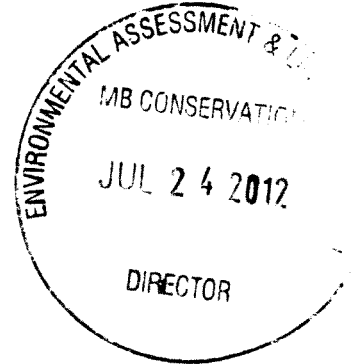
CC: Tracey Braun, Director Environmental Approval Branch, Darrell Ouimet,
Environment Officer



July 23, 2012

Honourable Gord Mackintosh
Minister of Conservation & Water Stewardship
330 Legislative Building, 450 Broadway
Winnipeg, MB R3C 0V8

Tracey Braun, Director Environmental Approval Branch &
Darrell Ouimet, Environment Officer
Manitoba Conservation, Environmental Approvals
123 Main St Suite 160,
Winnipeg MB R3C 1A5



Dear Minister Mackintosh, Director Braun, and Officer Ouimet:

Re: Public Registry File #4254.10 - Sunterra Horticulture Inc. - Sunterra Peat Mine Development

This correspondence is comments under the *Environment Act* regarding Public Registry File #4254.10 - Sunterra Horticulture Inc. - Sunterra Peat Mine Development.

In the spirit of the Manitoba Government's intentions to change how peat leases, mining, and licensing are handled in Manitoba, we have some suggestions:

- All leases for crown lands should be posted on line in a public accessible manner.
- Existing leases for peat lands should be posted immediately (both current and pending).
- Clear information as to leases that are deemed to be in place, and those leases that are frozen during the two-year moratorium on new peat mines should be clearly identified.
- Full information about existing peat mines, including which leases they use needs to be public also.
- Notification of any request for a peat lands lease or a peat lands mining license under the *Environment Act* should include an RSS feed, and on line notification.
- Public review for any such disposition is expected.
- Where First Nations are potentially affected then notification for potential leases should be included in the notification system regarding license applications.
- Public comments and review should apply to both leases and mining proposals.
- All comments, and responses to public reviews should be kept public.



- The fact that two primary acts (*Mines and Minerals Act* and *Environment Act*) are involved, plus various other regulations and acts, should no longer be an excuse to avoid making appropriate decision making and public reviews.
- One department, Manitoba Conservation and Water Stewardship should administer all steps with regards to peat mining, including if leasing, licensing/permitting/approvals under more than one act are involved.
- Peat leases and mines inside Crown land designations and wildlife management areas, parks, etc. should not be allowed.
- Peat leases and mines should not operate within 50 km of any cottage or housing subdivision, beach, camping or picnic area.
- Manitoba Conservation Environmental Approvals Branch advice to proponent for peat dispositions (and any other Crown lands disposition) should be posted with review documents.
- All other regulatory steps, laws used, permits or rights issued or potentially issued regarding any peat lease or license will be identified as part of the materials for public review.
- Methodology for ecological, aboriginal rights, and potential economic benefits should be researched, and applied in a transparent manner to any proposal or application for use of these peat crown lands.
- Government should become transparent as to the annual revenue from peat leases, and royalties from peat mines – with this information made public annually, including the allocation of these revenues also being public.
- Transparent research that is independent of the industry regarding peat reclamation needs to be conducted, especially regarding environmental effects.
- Any future peat lands policy for Manitoba needs to clearly differentiate between boreal region peat lands that are usually called muskeg, and the southern sites which may be smaller but equally as ecologically significant as boreal region peat lands.
- Finally, all leases for peat lands that are in the vicinity of Lake Winnipeg should be stopped immediately, with any existing leases or licenses cancelled.

Specific to the proposal for Public Registry File #4254.10 - Sunterra Horticulture Inc. - Sunterra Peat Mine Development we would observe:

- As outlined in the December 2011 Manitoba *Environment Act* Proposal Form (EAPF) the proposed peat mine will result in approximately 1324 hectares (ha) of land clearing (see: 6.3.7 Mammals/Habitat, p. 75), with 715 ha being mined directly (see: 3.4 Project Location, p. 11). This will have significant impact on moose and other wildlife in the region, and contradicts public policy.
- All of the quarry leases (both pending and existing) and proposed mining will take place inside Peguis First Nation's Treaty Land Entitlement (TLE)



Notification Zone (incorrectly referred to as Peguis First Nation's Community Interest Zone).

- That the proposed mines will be within the Moose Lake Wildlife Management Area (WMA) and in close proximity to Beaver Creek Provincial Park – inhibiting recreational activities in the area, reducing property values, and limiting other citizen activities.
- The proposal not only includes four existing quarry leases granted between 2006 and 2008 under the *Mines and Minerals Act*, but it also includes 6 additional pending (frozen) leases (see Table 2 at p. 124). It is inappropriate for a proponent to be applying for an *Environment Act* license on leases that it does not in fact hold. As you are likely aware, *The Save Lake Winnipeg Act* placed a two-year moratorium on the granting of new peat quarry leases, so there is no guarantee that these pending peat quarry leases will ever be granted (and we submit that these pending leases should not be granted).
- The proponent is choosing to refer to or avoid reference to smaller project study area when it benefits them to do so, and is likewise choosing to refer to or avoid reference to the much larger regional study area when it benefits them to do so. For example, the proponent claims the amount of land cleared equals: 1% of the regional study area, 7% of the project study, and because there is “abundant undisturbed habitat” including “protected habitat with the Moose Creek WMA” (see: 6.3.7 Mammals/Habitat, p. 75) any potential effects are determined to be “not significant.” However large portions of both the regional study areas, and project study areas include large portions of Lake Winnipeg (see: Figure 2). Obviously Lake Winnipeg is not suitable habitat for moose, and this additional area should be subtracted from any calculations of the percentage of moose habitat impacted.
- The calculations also need to take into account lands inside the project and regional study areas that are impacted by other developments, including cottages and other peat mines in the area. The cumulative effects section is quite deficient in this respect.
- The proponent also claims that moose populations are “abundant and secure” (see: 4.1.8 Mammals/Habitat, p. 43), but this fails to consider that moose population have been declining rapidly in many parts of Manitoba leading Manitoba Conservation to restrict hunting in several areas of the province.
- The proponent also cites a 1990 study “Evaluation of Ecological Constraints on Peat Mining in New Brunswick” by Helene Gautreau-Daigle in support of it's assertion that “...no [moose] population differences were observed between developed and undeveloped bogs.” (see: 6.2.2 Loss of Wildlife Habitat, p. 64). The claim is highly suspect and requires more than a nearly twenty year old study to substantiate. Their selection of scientific literature, from eastern Canada, is dated and opportunistic.



- The claim that "...restoration of a [peat mining] site often results in a wider diversity of flora which will result in a wider variety of habitats to support a more diverse fauna."(6.3.7 Mammals/Habitat, p. 75) is highly suspect and requires further substantiation. Clearly the question in restoration is if the same species and ecosystem function are returned. Wider diversity may mean invasive species.
- The proponent did request water quality data from Water Stewardship, and species data from Manitoba Conservation's Data Centre. However an absence of data may not have much weight, because this may simply confirm a lack of existing knowledge. As water Quality Modelling Specialist Elaine Page warned: "We have very little data from the 1970's on lake Winnipeg – much of the chemistry data has been collected intensively since 1999." Likewise Chris Friesen from Manitoba Conservation Data Centre disclaimed: "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." (see: Appendix D - Government Correspondence.) The same can be said for the lack of known heritage of historical data (see: 4.2.7 Heritage Resources, p. 51).
- The proponent did limited wildlife surveys in Sept 2010 and May-June 2011 (see 4.1.8 Mammals/Habitat, p. 43), but does the proponent realize that wildlife surveys need to be wider than the site only?
- Lastly the cumulative effects assessment needs to take greater account of the fact that there are several existing and pending peat mines and leases on the peninsula at the narrows between the north and south basins of Lake Winnipeg. Combined these numerous peat leases and mines have significant cumulative impacts.

Sincerely,

Gaile Whelan Enns
Director, Manitoba Wildlands

Beaver Creek Cottagers' Association
463 Sly Drive
Winnipeg, MB
R2V 2H3

July 21, 2012

Mr. Darrell Ouimet
Environmental Assessment and Licensing Branch
Manitoba Conservation and Water Stewardship
123 Main Street, Suite 160
Winnipeg, MB
R3C 1A5



RE: Application by Sunterra Horticulture to Strip Mine the Forest at Ramsay Point, Beaver Point, Deer Lake and Bullhead. File: 4254.1

Dear Sir:

The Beaver Creek Cottagers' Association (BCCA) is firmly opposed to the issuance of a licence to Sunterra to strip mine peat from the forest at Ramsay Point, Beaver Point, Deer Lake and the Bullhead Bog.

SunGro Horticulture has been granted a licence by your Office to strip mine 1170 hectares at Ramsay Point (Beaver Creek Provincial Park) for a period of 45 years. The BCCA appealed the issuance of licence number 2964 on August 9, 2011. We await a decision from the Minister's Office. Our letter of appeal contained several reasons why we are opposed to this mining. Many of those reasons are applicable to this separate application as well.

Berger has been granted a licence by your Office to strip mine 2557 hectares at Deer Lake (Little Deer Cottage Development) for a period of 77 years. The BCCA appealed the issuance of licence number 2969 on August 26, 2011. We await a decision from the Minister's Office. Many of those reasons are applicable to this separate application as well.

First, we must state that we are disappointed that the Province of Manitoba, amid great fanfare, announced the coming into being of The Save Lake Winnipeg Act. The provisions placed a two-year moratorium on, what was explained to the public, the issuance of any new licence or quarry lease. The law is terribly flawed as SunGro, Berger, and Sunterra continue to file applications as their quarry leases existed prior to June 16, 2011. Although they have found this huge loophole within the law, these firms are in contradiction, in our opinion, of the spirit and intent of this law. Prior to this law, Premier Selinger issued a media release whereby he stated that the Province of Manitoba is dedicated to saving Lake Winnipeg. If there is to be any new law, we sincerely hope that a better legal team than what Minister Blaikie had, is available to draft proper legal terminology.

In their Executive Summary dated December 8, 2011 KGS has stated, "In less than 3 years Sunterra will no longer have sufficient quality sphagnum peat moss to maintain the current operation. The proposed project is estimated to extend the peak operation by approximately 30 years. Without the proposed development Sunterra will either have to drastically reduce its workforce and investments within Manitoba and/or seek out resources in other Provinces."

Well, KGS has made Sunterra's position loud and clear for starters. Therefore, for starters, it is our position that this type of economic reasoning of taking their business to another Province, should just take place. The same tactic was used by a pork consortium in Winnipeg in regards to a massive slaughterhouse that was to be built within the St. Boniface Industrial Park. Many citizens complained and, fortunately, the Government of the day, listened. The slaughterhouse was not to be and despite catcalls from some within the business community, life went on. The Province continues to attract new businesses, despite those catcalls.

This strip mine is located on 715 ha of forest between Beaver Creek (Ramsay Point) all the way to a point north of Pine Dock (Bullhead). In between there are the 1170 hectares that SunGro will strip mine at Beaver Creek. Then 10 km northeast there are the existing 236 hectares at Mill Creek Cottage Development (Beaver Point). Sunterra has commenced strip mining Bog A2 which is 28.3 hectares located at Mill Creek on the east side of PR 234 right up to the shores of Lake Winnipeg. By separate letter we are requesting confirmation that the area being strip-mined will not exceed the 28.3 hectares that their licence allows. Sunterra has a licence for Bog B at Beaver Point as well. Fifteen km north of Mill Creek (Beaver Point) is where Berger has been granted a licence to strip mine 2557 hectares of forest at Little Deer Cottage Development (Deer Lake). Finally, Sunterra has applied to strip mine the forest 25 km north of Deer Lake at the Bullhead Bog, which is north of Pine Dock.

Stakeholders:

KGS, on behalf of Sunterra, has provided a list of stakeholders. Notably missing is the Mill Creek Cottage Development located less than 200 feet away from the existing processing and storage area. The residents there are in the process of building their recreation homes, apparently unaware that they are located in an industrial area. The Province of Manitoba continues to offer cottage lots for sale at that location. We wonder how long it will be before they form an Association and deal directly with the Province over this problem.

KGS has listed fourteen (14) stakeholders. Amongst the 14 are 3 governmental agencies; Water Stewardship, Mines and DFO. Of the other 11, Peguis First Nation, Manitoba Trappers Association, the RM of Bifrost or the Beaver Creek Bible Camp gave any responses to KGS.

Of course, Water Stewardship is now part of Conservation. Mines have issued these quarry leases and that, apparently, is all they are interested in. When we needed to protect

our shoreline against high water and erosion, the cottage owners had to jump through several hoops placed by Manitoba Conservation and DFO in order to get a permit. All the while Manitoba Hydro ensured that the Lake remained above 715 feet. After all the I's were dotted and the T's were crossed, we received a permit to protect our lakeshore frontage. DFO was a department that was adamant that all regulations must be complied with. We deeply respect the need to be environmentally sound, but the fact remains that DFO did not object to any applications made by SunGro at Ramsay Point or Berger at Deer Lake. So, there is a law and regulations for us with cottage lots, who are paying the bill out of our own pocket, and another for mining companies. In the meantime we spend thousands of dollars to protect our crown-leased shoreline and the governmental agencies, Conservation for the Province and DFO for the Federal government, do not object to a corporation that plans to rape and strip mine the forest. And, in the end, unlike Lake Manitoba communities, we on the west side of Lake Winnipeg paid our bills for construction and went on with our lives.

The BCCA has been in contact with Peguis First Nation. The land in question is the traditional land of Peguis First Nation. We in no way, shape or form pretend to speak for them. It is our understanding that the Province is complying with Federal law under Section 35 of the Constitution Act and consulting with Peguis First Nation. It is the responsibility of the Province of Manitoba to act on the Duty to Consult, not KGS or Sunterra. For the Province to not consult as they failed to do with SunGro's application at Ramsay Point, Bergers at Deer Lake and, indeed, the original application by Gromor in 1997 for the existing Sunterra mine; they do so at their own peril. Grassy Narrows First Nation proved that in Ontario in August of 2011.

At a policy workshop hosted by the Province we listened to the representatives from Peguis First Nation who passionately explained how their First Nation uses the forest for hunting and for feeding their people. We learned how the various plants are used for traditional medicines. We learned that the forest is sacred. We learned the same from workshop leaders, Ray and Sofia Rabliauskas from Poplar River First Nation. Ellen Young represented Bloodvein First Nation and told about their concerns regarding the damage to Lake Winnipeg. These First Nation representatives have got it right. The earth is more important than the bottom-line.

It is interesting to note that the rest of the stakeholders are all opposed, save the far away Village of Riverton, to this plan to strip mine the forest. We have spoken to Mr. John Mowat, President of the Matheson Island Fur Council. The Province of Manitoba has not consulted with them. They are opposed to these mining companies coming in, strip mining the forest and destroying their way of life. Trapping has taken place within the Deer and Moose Lake area since the area was established at the turn of the last century. The Matheson Island Fur Council has their own autonomy and therefore would supersede anything forwarded by the Manitoba Trappers' Association. Once again, it is not KGS that should consult with the Aboriginal/Metis Community, but the Province of Manitoba.

We have spoken to several residents from Pine Dock. To a person, they are opposed due to several reasons. Many have signed a letter of opposition to this application and those

letters are on file with your office. The community's only source of income is derived from commercial fishing. They are concerned that by stripping the forest of peat that there will not be any natural filtration system and Lake Winnipeg will be degraded further. Another reason, one that is shared by everyone who uses PR 234, is the damage caused by the huge semi trailers. The road is in atrocious shape, but more on that later.

We have spoken to several residents from Matheson Island. They too, like Pine Dock, are opposed to this application by Sunterra. The main source of income is commercial fishing and they are worried about further degradation of our Lake Winnipeg. They too are very concerned about PR 234. Several citizens of Matheson Island have signed a letter of opposition to this application and they are on file within your office.

The group from Pebblestone Beach is opposed and have listed their concerns. We support all of these concerns. One of their concerns is that Provincial Road 234 should be paved. We will discuss Provincial Road 234 later but it is the position of the BCCA that we do not support, under any mitigating conditions, the granting of any strip mining of any forest within the Province of Manitoba. Our reasons follow.

Provincial Road 234:

Every person we talked to had one common complaint and that is the condition of PR 234. A very important stakeholder should be Manitoba Infrastructure and Transportation (MIT). By separate letter we are finally writing to Minister Ashton to personally invite him and Minister Mackintosh to travel up to our (so far) beautiful neck of the woods and to also observe, first hand, the condition of Provincial Road 234. We have talked about this for far too long, but the invite will go out in a letter July 24th, 2012. In fact, the Premier will be invited to join the two senior Ministers of his administration.

We have offered comments in our two appeals about this road. This writer has been at Beaver Creek since 1957. As a young teenager we saw the road in its infancy. Our next-door neighbour at Beaver Creek was Dr. Steinn O. Thompson, MD who also happened to be the MLA for this area. According to his book, "Riverton and the Icelandic Settlement"(pages 394 to 404), Dr. Thompson presented a brief to the Manitoba Legislature regarding the plight of the commercial fishers from Matheson Island, Pine Dock, Washow Bay, Bullhead, Loon Straits, Rabbit Point and Bloodvein River. Due to heavy snowfall and light temperatures, Lake Winnipeg was slow to freeze in the winter of 1948. Usually, tractors would pull a dozen sleighs on the ice to the railhead at Riverton. The Legislature passed a resolution that led to the construction of a road to Matheson Island in January of 1949. The road eventually took seven years to be completed. Riverton based Monarch Construction was on it from start to finish.

During the first year, Monarch slashed through the virgin forest in a remarkable time of less than one month. The fishers were able to operate their tractors and sleighs over the frozen road and deliver their fish to the railway at Riverton. This road still allows the commercial fishers from Pine Dock, Frog Bay, Matheson Island, Bloodvein First Nation and Berens River First Nation to have their fish transported to the Freshwater Fish Institute in Winnipeg.

The road, however, is built on top of a bog, the same, as Sunterra and the other mining companies, want to strip away. In the last few years, PR 234 was widened from the Washow River up to Beaver Creek. The road is entirely different from Beaver Creek up to the End Of The Road sign. From there, it is narrow and difficult to meet or pass vehicles on this stretch. Before the Province invests hundreds of millions of dollars into paving PR 234, it would require massive work, widening that portion northward from Beaver Creek. It was reported that when Highway 75 was twinned south to Emerson that it cost over one million dollars per kilometre. That is solid gumbo clay, and not bog. The cost to pave 234 with its bog base would be prohibitive.

Ironically, KGS, on behalf of Sunterra, states they would contact MIT to have the road "upgraded" with no firm definition of what "upgraded" actually means. While doing research on these appeals we found out that there is no levy or fee whatsoever placed on the peat mine for maintenance to PR 234. And yet, they would lobby the government for millions of dollars to upgrade the road. How much are we, the taxpayers of the Province of Manitoba, expected to dole out to subsidize these corporations? As further mitigating efforts, they would have MIT place water on PR 234 as part of a dust control effort. In reality, the Province sprays a chemical on the road to control dust. In years gone by, one costly application per year was more than enough. Now, with all the trucks on the road, there is a requirement for graders to constantly repair PR 234. In fact, the only days they are not out is when it rains. As the road dries, and the graders move over, MIT has tanker trucks spray dust control on the road. This is very costly as out of area municipalities can attest to. During research for our Deer Lake appeal we learned that on some days, Highways has five (5) graders repairing PR 234 at the same time. Five graders! How many communities in Manitoba, that are larger than ours, have this much attention and money spent on one of their roads? Maybe, they are correct and paving would only cost a few hundred million dollars and would be cheaper in the long run. Of course, the trucks could go faster to market and, thus, enhance the mining companies profits and then more maintenance would be required.

Further mitigation by the mining company would be to instruct the truckers to obey the 70-kph speed limits through Beaver Creek Provincial Park. First, and foremost, KGS or Sunterra had absolutely nothing to do with this speed restriction being placed on PR 234. It came about because our Association received constant complaints from our Members about the semis roaring through at more than 100 kph. Calls to Sunterra went unheeded so the BCCA approached MIT and got the speed limit reduced, without any lobbying or support from KGS or Sunterra. And, sadly, it means nothing to the majority of trucks hauling peat moss or equipment for Sunterra. KGS in their application on behalf of Sunterra, state, "All traffic associated with the development will be directed to drive according to road conditions and adhere to the posted speed limits." That, my friends, is the law of the land for everyone and not a reason to ask for more huge trucks on our road.

In their application, we firmly believe that they are minimizing the number of trucks they say will be needed to haul their peat to Texas. One must realize that in order for a truckload to go to market, an empty truck has to show up in the first place. The

application states that the new development would be an increase of 50 ha in peak operation and would result in an increase of “only” (KGS’s words) 1420 truckloads per year, equivalent to 48 trucks per week. Using their figures, one would have to actually double the figures (considering empties and loads) so there would be 2840 trucks per season or 96 per week. This writer counted 38 peat trucks in one day last August (19 empties going north and 19 loads coming back south), as reported in our Deer Lake appeal. How many trucks will there be if the Province of Manitoba denies our appeals and SunGro starts to strip mine 1170 hectares and Berger commences to strip mine 2557 hectares. Using their own estimates for this application by Sunterra, 50 hectares is equal to 2840 trucks per season. Therefore, the cumulative effect for 4442 hectares from all the mining companies that KGS has made application for in the past year, would amount to thousands of trucks per season. We’ll need several Flying J’s to support all these truckers.

Once the Province of Manitoba grants this licence, it will be the taxpayers who will be responsible for the upkeep of PR 234. We want to caution Minister Ashton and Minister Mackintosh about that fact. Quite simply, the trucks create an extremely dangerous condition. The grader operators do a fantastic job, however, within 24 hours they must return to the same section of road and start all over again. At night it is impossible to see the massive ruts at the side of the road where a truck has carved a huge hole in the road. If anyone reading this thinks we are exaggerating, please attempt to drive PR 234 from Highway 8 up to Mill Creek. Oddly enough, the road, although narrow, improves after you get past the Sunterra Industrial Park on Beaver Point at Mill Creek. Originally PR 234 was not built for these big trucks, but for the residents of Pine Dock, Matheson Island and Bloodvein First Nation. That should continue to be the primary reason for its existence.

The Environment:

On December 14, 2009 several prominent scientists wrote to several International Leaders in a letter titled “Scientists Call on International Leaders to Protect Vast Boreal Carbon Storehouse” Prime Minister Harper was one of the Leaders that the letter was addressed to. Our Federal Government has proven, as of late, that they are anti-environment. We sincerely need our Provincial Government to step up to the plate to protect Manitoba’s environment. In a study done by The Songbird Initiative, there was praise for the Government of Manitoba regarding the Pimachiowin Aki World Heritage Project. One has to wonder how our Government can be so progressive at times and then stoop to approve these applications to strip mine the forest. By approving these applications, the Government of Manitoba is distancing them from this praise.

We refer your Office to a report issued by the Songbird Initiative entitled “The Carbon The World Forgot”. It is a very informative read and is available online. It was attached, in full, as part of our Ramsay Point and Deer Lake appeals.

By disturbing the bog, there is an increase of green house gases released into our already fragile atmosphere. In reviewing this we were referred to an article copied below:

Greenhouse Gas Emissions from Canadian Peat Extraction, 1990–2000: A Life-cycle Analysis

Julian Cleary*, Nigel T. Roulet*, Tim R. Moore*
Abstract

This study uses life-cycle analysis to examine the net greenhouse gas (GHG) emissions from the Canadian peat industry for the period 1990–2000. GHG exchange is estimated for land-use change, peat extraction and processing, transport to market, and the in situ decomposition of extracted peat. The estimates, based on an additive GHG accounting model, show that the peat extraction life cycle emitted 0.54×10^6 t of GHG in 1990, increasing to 0.89×10^6 t in 2000 (expressed as CO₂ equivalents using a 100-y time horizon). Peat decomposition associated with end use was the largest source of GHGs, comprising 71% of total emissions during this 11-y period. Land use change resulted in a switch of the peatlands from a GHG sink to a source and contributed an additional 15%. Peat transportation was responsible for 10% of total GHG emissions, and extraction and processing contributed 4%. It would take approximately 2000 y to restore the carbon pool to its original size if peatland restoration is successful and the cutover peatland once again becomes a net carbon sink.

Received: February 19, 2004; Revised: May 12, 2004; Accepted: May 21, 2004
AMBIO: A Journal of the Human Environment 34(6):456-461, 2005
doi: 10.1579/0044-7447-34.6.456.

These experts have proven that it would take 2,000 years to restore the carbon pool to its original size. If this is a proven fact, we must ask how a government would be irresponsible and ignore it?

Mammals/Habitat:

The great thing about having a cottage at Beaver Creek and surrounding areas is that on any given day you can see wildlife freely moving about. No cages. No fences, just freedom. We take offence to the author(s) of this report when they refer to these animals and write, in part: "All of which are listed provincially as S5 (abundant and secure; Table 7)". If the forest disappears here and the Government decides to issue several of these licences to make the forest disappear, just how abundant and secure will these animals be? Just yesterday we saw a coyote in our back yard walking along like he owned the place. And, he is correct, he does. The moose, deer, bears, wolves, martens, weasels, fishers, mink join the coyote in living in an area that they can be self-supporting in. If the Province approves this application, where will these animals go? The unfortunate answer is they will be driven out to PR 234 to be run over by a semi trailer carrying peat. Or, they will wander into an inhabited area to be trapped or shot. Hopefully they can continue to live in an undisturbed forest.

Birds/Habitat:

There are hundreds of birds that occupy the forest within this area. In the spring the songbirds return bringing a sense of joy to the humans visiting their forest. In the spring

and fall the forest surrounding Ranger Lake is alive with the sounds from the various waterfowl, geese, ducks, sand hill cranes by the thousands. And, that is just our area. What about the entire peninsula right up to Matheson Island? If the Mayor of Riverton is looking to find economic development he might look into ecotourism. Once the forest is destroyed, that opportunity will be gone forever.

Aquatic Biota/Habitat:

Our only comment here is that the original application by SunGro for Ramsay Point stated that only one solitary dead fish was found to exist. They even intimated that it was killed by another animal or bird and left at Ranger Lake. We challenged that statement, as there are 3 or 4 generations of families who have regularly walked into Ranger Lake and successfully fished. We have spoken to Ann Mowat from Matheson Island who recalled fishing at Ranger Lake over a period of several years. Now, according to the proponent's own evidence, there are northern pike, mud minnow, perch, stickleback and Johnny Darter fish. It would appear that the proponent has hired a better fisher for this study, or, maybe we are correct and there are lots of fish in Ranger Lake. Our 10 year olds will happily guide their authors to their favourite fishing holes.

Amphibians and Reptiles:

Just as in the application by SunGro to strip mine the forest at Ramsay Point, the northern leopard frog continues to be a special concern species. Whenever we go into the forest we see different types of frogs and garter snakes. These will all disappear once Sunterra and the other mining companies start strip-mining our forests.

Once the Province approves this licence, Sunterra will have the right to prohibit trespassing. On Saturday, July 14, 2012 one of our neighbours at Beaver Creek, advised this writer he could not sign our petition, as he wanted more information, specifically from Sunterra. This elderly gentleman drove to Sunterra's plant at Mill Creek to ask questions and was rudely and promptly told he was trespassing and to get out. Due to the attitude of the Sunterra employee(s), he signed our petition that afternoon.

In closing, we remind your Office that out of all the named stakeholders, the only supporting one was the Mayor of the far away Village of Riverton. Mayor Colin Bjarnason. According to KGS's application on behalf of Sunterra, the Mayor has stated, publicly, that Sunterra "purchases more goods compared to the recreational cottage developments occurring in the area." The Conservative Selkirk-Interlake Member of Parliament, James Bezan, is onside with Mayor Bjarnason, but many Riverton residents we have spoken to care for the Lake and the environment and disagree with their Mayor and their MP.

There are 12 cottages being built at Pebblestone Beach. Some are in excess of 2,000 square feet in size. Beaver Creek has 51 developed cottage lots. Mill Creek has 78 cottages under construction, again some very large. Little Deer has 120 lots, some massive permanent homes. Leaside has more than 20 developed lots. The End of The Road Development has over a dozen. Matheson Island is home to approximately 120 residents. Pine Dock has approximately 100 residents. The hundreds of residents from

Bloodvein First Nation shop in Riverton and are opposed to this application. We have to wonder if the good mayor checked with the merchants who own the Riverton Motor Inn, the downtown restaurant, the Post Office, the Castle Lumber Store, Rick's Electric, Doug's Plumbing or the people who supply gravel and topsoil as well. Are they part of the anti-cottagers movement? The Riverton Co-op is very busy with us cottagers, and others who do not support this application to strip-mine the forest. Do they agree that Sunterra purchases more goods than us? The MICC Thrift Shop even has a sign on Highway 8 welcoming campers and cottagers. We realize that two major merchants have referred to us all as outsiders but, in total, there are more outsiders shopping in Riverton than residents. Riverton must realize that our shopping dollars will not be spent where we are not wanted or welcome. We are in the process of determining who does not want our shopping dollars and we definitely will respect their wishes. Stay tuned. We'll keep the good mayor posted.

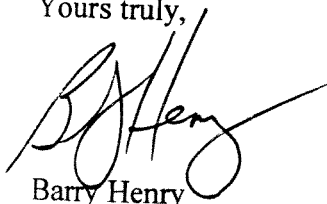
Due to this application being filed by KGS on Behalf of Sunterra, we have learned new facts that we were not aware of when preparing our appeals against the issuances of licences to SunGro at Ramsay Point and Berger at Deer Lake. For those reasons we will elect to utilize the provisions contained within Section 29 of The Environment Act and file that new evidence with the Minister.

We urge the Province of Manitoba to deny this application and any other application whereby our environment will be placed in jeopardy. We sincerely urge the Province to put in place a permanent moratorium regarding strip-mining our forests for peat. We sincerely request the Minister to ensure he has qualified staff who will use proper legal language contained within any new law in order to prevent these corporations from looking for and finding loopholes.

Should further clarification in regards to our position or any sources referred to be required, please do not hesitate to contact us.

Thank you for your time and efforts involved in this serious matter.

Yours truly,



Barry Henry
For Rick Heuchert, President

CC: The Honourable Gord Mackintosh, Minister of Conservation and Water Stewardship
The Honourable Steve Ashton, Minister of Infrastructure and Transportation



Scientists Call on International Leaders to Protect Vast Boreal Carbon Storehouse

December 14, 2009

Dear Prime Minister Batbold, President Halonen, Prime Minister Harper, President Hu Jintao, President Medvedev, President Obama, Prime Minister Stoltenberg, and Prime Minister Reinfeldt:

As leaders of the eight nations that steward the global boreal forest biome that accounts for more than half of the world's terrestrial carbon reserves and half of the world's remaining intact forests, you have an exceptional responsibility to the citizens of the planet. You also have an exceptional opportunity to show global leadership by calling for mechanisms to better protect these carbon reserves during the upcoming climate negotiations in Copenhagen.

Globally boreal forests are a key carbon pool that has been largely overlooked in the climate change policy debate to date. In fact, boreal forest holds more carbon per acre than any other land-based ecosystem, perhaps two or three times as much carbon as in the tropics. The boreal region is also home to some of the world's last intact forests, abundant populations of large mammals and birds and home to hundreds of indigenous communities. When boreal soils and peatlands are disturbed by development, major carbon reserves are released. These facts make it imperative that the world's policy makers and public now make a concerted effort to ensure that both the boreal forest and its vast stores of carbon remain intact. To achieve this will require both drastic cuts in industrial emissions and importantly, a vast increase in the areas protected for their carbon values and left undisturbed from industrial development.

Industrial emissions of greenhouse gases are moving the world into an uncertain future. Solutions to slow negative impacts of rapid and large changes are still possible, if we act swiftly and strategically on a global scale. First and foremost is, of course, a drastic reduction in industrial emissions of carbon from the burning of fossil fuels. Without real and substantial cuts in the amount of carbon we are putting into the atmosphere, the ecological foundations upon which humans and all life depends will be degraded and changed in more ways than scientists or the public have been able to predict or imagine. The northern parts of the planet, especially within your eight nations, are already experiencing some of the most dramatic impacts and will continue to be among the hardest hit on the globe.

Reducing the loss of carbon from industrial land-use needs to be included as part of the solution. In particular, the accelerating conversion of natural habitats for agriculture, forestry, mining, oil and gas extraction, hydropower and other industrial purposes must be slowed. Globally, land-use change has accounted for nearly 20% of annual greenhouse gas emissions. Because of these emissions, there has been a recent push to find financial incentives and policy instruments that will encourage developing tropical nations to slow deforestation and retain natural forests through environmental service payment schemes and increased protection efforts. This initiative is critical to helping to slow climate change impacts and to

protect the incredible species richness and indigenous cultures of these tropical regions and we encourage you to do your part to ensure that this continues. We also urge you to broaden this approach by including the world's carbon-rich northern boreal forests as a focus for future carbon protection policy solutions.

Policy mechanisms under negotiation should formally recognize the importance of maintaining intact carbon stores in the global boreal forest region and other terrestrial ecosystems and provide incentives for protecting and conserving large intact carbon rich ecosystems. All emissions including those from land-use activities should be accounted for in national carbon budgets and revenues obtained through separate regulatory processes like taxes or cap-and-trade should be used to lower total emissions and maintain intact ecosystems that will be the future climate change refugia for the earth's biodiversity.

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Ducks Unlimited Canada

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Dr. John Jacobs
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