



Lake Winnipeg
Foundation

3rd Floor, 303 Portage Avenue | Winnipeg, MB R3B 2B4 | (204) 956-0436 | info@lakewinnipegfoundation.org

February 2nd, 2012 WORLD WETLANDS DAY

The Lake Winnipeg Foundation encourages the preservation of existing wetlands, the restoration of degraded wetlands, and the development of new wetlands centered on technological and institutional requirements for wetland management and governance.

As Peat extraction is destructive of wetlands the LWF does not endorse peat operations being permitted anywhere in the Province.

Parks should be spaces reserved for habitat and biodiversity protection for present and future generations.

Recent scientific findings have confirmed that rapid eutrophication of Lake Winnipeg during the past 20 yrs is driven mainly by phosphorus transported to it from diffuse watershed sources by more frequent and extensive Red River floods.

We believe that increasing Red River flooding is a consequence of climate warming. According to our POSITION STATEMENT ON CLIMATE CHANGE "*...the Lake Winnipeg Foundation supports policies and practices that reduce greenhouse gas emissions.*"

As Peat extraction is a net GHG contributor, the LWF opposes peat operations anywhere in the Province of Manitoba.

The reduction in GHG emissions resulting from a ban on Peat extraction would be in keeping with provincial legislation, The Climate Change and Emissions Reduction Act (June 2008). It would also support the spirit and intent of the Save Lake Winnipeg Act

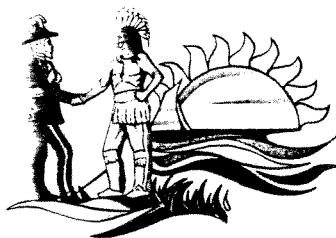
In summary, the LWF considers peat extraction to be unnecessary and unsustainable and urges the Manitoba Government to support development and use of alternative processes and products, such as the conversion of dairy manure into horticultural products and bio-gas. Nutrient reduction to Lake Winnipeg would be a welcome co-benefit of this approach.

LWF POSITION STATEMENT ON CLIMATE CHANGE

Global climate warming, from human-driven increases in atmospheric CO₂ with associated changes in rainfall, runoff, evaporation, ice duration, and temperatures in the Lake Winnipeg watershed, is impacting the Lake Winnipeg ecosystem.

Extreme hydrological events, such as flooding and drought, are becoming more common and are detrimental to the lake's ecology and biodiversity. Increasing water temperatures are contributing to proliferation of toxic blue green algae and to invertebrate species changes which ultimately influence the Lake Winnipeg fish community.

The Lake Winnipeg Foundation supports policies and practices that reduce greenhouse gas emissions.



F I S H E R R I V E R C R E E N A T I O N

July 23, 2012

Darrell Ouimet
Environment Assessment and Licencing Branch
Manitoba Conservation and Water Stewardship
e-mail darrell.ouimet@gov.mb.ca



Dear Mr. Ouimet,

**RE: Sunterra Horticulture (Canada) Inc.
Peat Mine Development December, 2011 Manitoba Environment Act
Proposal – Final 11-1996-01**

The Fisher River Cree Nation is strongly opposed to the above noted peat mine development proposal and requests that the Environment Act licence application not be approved for the reasons set out in this letter.

Manitoba's Duty to Consult

The proposed developments are located within the areas that have been traditionally used and occupied by members of the Fisher River Cree Nation in the exercise of their aboriginal and treaty rights since time imemorial. The assessment report does not include any assessment as to the adverse impact of the proposed and potential future peat mining developments on the aboriginal and treaty rights of members of the Fisher River Cree Nation.

Manitoba owes a duty to directly engage Fisher River Cree Nation in a process for consultation, justification and accommodation prior to the issuance of any authority or disposition, express or implied, in relation to the Sunterra Environment Act licence application and any related Crown land applications, with the objective of determining whether Manitoba's conduct might adversely affect, impact or infringe a right which is recognized and affirmed under Section 35 of the Constitution Act, 1982.

Fisher River Cree Nation was not consulted prior to the province approving the existing quarry leases held by Sunterra. Although the province has recently contacted us with respect to entering into a consultation process with respect to the environment licence for the existing Sunterra leases, this process has not begun and likely will not begin prior to the deadline for comments on this EA proposal.

It is therefore our position that any approval or conditional approval of the EA licence application prior to the government's completion of consultation with Fisher River Cree Nation would constitute a complete disregard for the existing legislation, Supreme Court rulings, and public policies noted below pertaining to the Crown's duty to consult:

- Section 35 of the *Constitution Act, 1982* states: *“The existing aboriginal and treaty rights of the aboriginal peoples of Canada are hereby recognized and affirmed.”*
- The Supreme Court of Canada has ruled that the Crown has a legal duty to consult in a meaningful way with First Nations, Metis communities and other Aboriginal communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise of an aboriginal or treaty right.
- The Supreme Court has further established that government can not interfere with aboriginal or treaty rights without a compelling reason to do so (eg. conservation or safety purposes) and if such a reason exists, government must be respectful and considerate of the aboriginal community’s rights such that there is the least possible adverse impact to those rights.
- Subsequent to Supreme Court of Canada rulings, the Government of Manitoba has acknowledged in its Interim Aboriginal Consultation Policy and other public documents that the Crown has a legal duty to consult in a meaningful way with First Nations, Metis communities and other Aboriginal communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise of an aboriginal or treaty right.
- On November 12, 2010, the Government of Canada formally endorsed the United Nations Declaration on the Rights of Indigenous Peoples which includes:
 - Article 26 states that Indigenous peoples have the right to, and the right to own, use, develop and control the lands, territories and resources which they have traditionally owned, occupied or otherwise used or acquired, and the state shall give legal recognition to these lands, resources and territories with due respect to the customs, traditions and land tenure systems of the indigenous peoples concerned;
 - Article 32 states that Indigenous peoples have the right to determine and develop priorities and strategies for the development or use of their lands or territories and other resources, and States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.

“Pending Leases”

The government of Manitoba has confirmed with us that the above mentioned consultation process will not include the “pending leases” referred to throughout the assessment report. The “pending leases”, which in fact are pending applications for leases and should have been referred to as such, are on hold under the moratorium imposed under the Save Lake Winnipeg Act and can not be processed while the moratorium is in place. Therefore, they will be addressed by Fisher River Cree Nation at the appropriate time when and if the moratorium affecting them expires, and the Manitoba government fulfills its duty to consult with respect to those applications at that time.

Impact on Fisher Bay Provincial Park and Proposed Expansion

Chief Crate and Council of Fisher River Cree Nation have long recognized the importance of developing a sustainable tourism and recreation based economy for their community. Their successful joint efforts with the Manitoba government that resulted in the recent designation of Fisher Bay Provincial Park (FBPP) as well as a joint cooperative cottage lot development agreement for the Bay River Cottage Subdivision are just two examples of the initiatives taken to develop this economy by working in close cooperation with the province.

The Fisher Bay Provincial Park encompasses the west shores of Fisher Bay and extends eastward towards Deer Lake, ending just before Moose Lake. Fisher River Cree Nation has for many years proposed expansion of the park boundaries further east beyond Moose Lake. Any approvals of environment act licences and quarry leases for peat mining developments on the Washow-Fisher Peninsula will not only adversely affect and future opportunities for expansion of the provincial park, but will also jeopardize the development of a sustainable tourism and recreation based local and regional economy.

The Center for Indigenous Resources (CIER) conducted a study for Fisher River Cree Nation regarding the FBPP and estimated that this park will generate roughly \$12,000,000 annually in tourism revenues once it is fully operational. As mentioned above, these and other potential tourism and recreation based economic benefits to the region that includes not only the community of Fisher River Cree Nation, but also communities to the east such as Riverton, Pine Dock and Matheson Island, will be at risk as a result of the adverse impacts that the proposed peat mining developments would have.

The Value of Boreal Wetland and Peatland Ecosystems

Economic values of wetland and peatland ecosystems are critical factors that were not, but should have been included in the economic impact assessment of the proposed peat mine developments.

Based on our research, we estimates the true value of boreal wetlands to be in the range of \$926/ha to \$4196/ha per year. The types of goods and services that the valuation includes are: Flood Control, Amenities/Recreation, Water Quality, Biodiversity, Habitat/Nursery, and Recreational Hunting.

In addition to the above described economic values, boreal wetland ecosystems, provide additional value in terms of carbon storage and sequestration. The process of extracting peat also creates emissions of CO₂, SO₂, and NO_x. Using the data provided in the Sunterra KGS report regarding CO₂ emissions, we have estimated the damages caused by CO₂ from the Sunterra operations between \$3.8 and \$4.3 million dollars, in present value based on the stated 39 year lifespan of the mines. The per year damages have been estimated to be between \$226,000 and \$257,000 thousand dollars.

Specific Report Related Comments

In addition to the preceding reasons for our objections, we have included additional comments on the following specific excerpts taken from the proposal.

2.2 SCOPE OF THE ASSESSMENT

Excerpt from Report: *The major alteration is for the proposed amendment of the existing peat mine development at the Beaver Point Bog to include Sunterra's existing and pending quarry leases at the Bullhead, Little Deer Lake and Ramsay Point Bogs.*

**TABLE 1
QUARRY LEASE INFORMATION
SUNTERRA PEAT MINE DEVELOPMENT**

Site	Quarry Lease No.	Area (Ha)
Little Deer Lake Bog	QL-1323	266.8
	QL-1406	100.8
	QL-2390*	98.5
	QL-2391*	84.8
	Sub-Total	550.94
Bullhead Bog	QL-1134	248.4
	QL-1291	49.7
	QL-2401*	51.4
	QL-2402*	48.9
	Sub-Total	398.36
Ramsay Point Bog	QL-2409*	128.0
	QL-2410*	246.6
	Sub-Total	374.60
	Total	1323.90

*Notes: * indicates that the Quarry Lease is still pending.*

Fisher River Cree Nation Comments: It is the Fisher River Cree Nation's position that the province should not have accepted an Environment Act (EA) licence application that included the "pending quarry leases" on Crown lands noted by the asterisks in the above table, as Sunterra has no legal tenure or interest in those Crown lands and there is currently a moratorium in place disallowing any approvals or processing of applications for quarry leases or permits for peat extraction.

Although Sunterra has applied for quarry leases, processing of those applications is on hold as per government's moratorium. Simply applying for the quarry leases does not convey any legal rights or interests in the lands nor in the peat minerals located on those lands. Therefore, accepting an application for an EA licence contravenes the purpose of the moratorium in our opinion.

We conclude from the maps provided, that the required access roads to the various quarry leases (QL) will need to be constructed on Crown lands that are not within the QL boundaries. However, the report does not indicate whether the proponent has applied for and/or acquired the necessary legal authority under the Crown Lands Act.

It appears that the proponent is applying for an EA licence for development of a) peat mine operations on Crown lands for which there are no valid existing QLs, and b) access roads on Crown lands for which the proponent does not appear to have the necessary legal tenure or authority (we base our assumption on the fact that we have not been consulted with respect to the Crown lands outside of the QL areas that are required for the access roads).

Do EA licence applicants not have to provide proof that they have legal ownership or authority over lands on which development(s) requiring an EA licence are to be established?

Excerpt from Report: *The proposed peat harvesting developments will not likely result in significant adverse environmental effects, based on the available information for this project, the environment, the assessment of environmental effects outlined in this environmental assessment report, and application of proposed mitigation measures, including conducting the required follow-up.*

Fisher River Cree Nation Comments:

As stated by KGS in the report, "wetlands are considered one of the most productive ecosystems, sustaining more life than any other ecosystem. Wetlands in Canada developed following the most recent retreat of glacial ice and are typically between 5,000 and 10,000 years old."

"The Bullhead, Little Deer Lake and Ramsay Point Bogs can be described as lightly to moderately treed raised bog areas with open areas of *Sphagnum* moss."

While bogs and fens may be quite common in Manitoba and Canada, Raised Bogs such as these three bogs are not common.

We maintain that these bogs are unique, ecologically fragile and sensitive areas and require exhaustive studies in order to understand the linkages between the various eco-systems that make up the Washow-Fisher Peninsula, and be able to assess their true values in terms of biodiversity, carbon storage and sequestration, water filtering and flood control.

It is our opinion, based on consultation with our Elders, Traditional Ecological Knowledge holders and community members, as well as through various research, that the proposed peat mining developments, along with the cumulative effects of other existing and proposed peat mining developments within the Washow-Fisher Peninsula, can have serious and potentially irreversible adverse effects on the sensitive and fragile natural ecosystems of not only the project study area but also the entire peninsula.

Excerpt from Report: *The proposed project is estimated to extend the peak operation by approximately 30 years.*

Fisher River Cree Nation Comments: Based on this and other projections in the assessment report related to restoration timelines and limitations, the impacts will affect more than one generation which is a major adverse impact and infringement on the aboriginal and treaty rights of Fisher River Cree Nation (FRCN) members who hunt, fish, trap and gather traditional medicines and plants in this area.

Hunting, fishing and trapping by non-FRCN members will also be adversely affected for at least one generation, which will affect many individuals and families from Riverton, Arborg, Pine Dock, Matheson Island and other communities.

Excerpt from Report: *The scope of the project includes planning, designing, constructing, operating, maintaining and eventual decommissioning and restoring the proposed peat mine development at Bullhead, Little Deer Lake and Ramsay Point Bogs.*

Fisher River Cree Nation Comments:

The scope of the project should not include the "pending leases" areas for the reasons previously stated.

Based on our limited research, it is our understanding that on a local scale, peat extraction significantly alters hydrological and ecological functions, and that "...many of the changes are irreversible, such as changes to the soil structure (Okruszko, 1995; Gottlich et al., 1993)".

The assessment report does not address this issue nor explain how the hydrological, ecological and carbon storage functions of the peatlands will be restored to their original condition.

Excerpt from Report: *The Class 2 peat mining development will include access roads, bog roads, a drainage ditch system with settling ponds and an on-site facility and equipment storage area.The environmental assessment of the proposed peat development was carried out based on project information provided by Sunterra andincluded consultations with stakeholders; and site investigations by the project team.*

Fisher River Cree Nation Comments:

The report states there was consultation with stakeholders but the Fisher River Cree Nation was not contacted by the proponents despite the fact the subject areas fall within the traditional territory of Fisher River Cree Nation.

The report did not identify that any consultation occurred with trappers (for the area south of the registered trapline area), hunters or commercial fishermen, many of whom are Fisher River Cree Nation members; nor is there any indication that an assessment was done regarding the potential impact on those groups.

Excerpt from Report: *Follow-up was proposed to verify the accuracy of the assessment and determine the effectiveness of the mitigation measures. Significance of the residual environmental effects remaining after mitigation was then evaluated.*

Fisher River Cree Nation Comments:

There is nothing in the report to indicate what the legal obligations and/or consequences to the proponent would be if a follow up activity identified a serious problem. Would the licence identify the conditions or circumstances under which operations would be required to immediately cease until the problem is addressed to the satisfaction of government?

There is a serious lack of reference to the potential adverse impacts on the moose populations in the area, nor are there any proposals to undertake wildlife studies and surveys along with associated mitigation and/or habitat enhancement plans. There is widespread concern in the province regarding moose populations and closures that affect the treaty rights of First Nations with respect to hunting. An assessment of the potential for significant adverse impact on moose in this area is seriously lacking in this report.

Sunterra's existing EA licence 2288R for the Beaver Point Bog peat mine included numerous conditions and requirements for monitoring, reporting, mitigation, fishery enhancement etc.

What has government's experience been with respect to environmental impact assessments (water quality, impact on moose and other wildlife, plants, fish etc.) and audits of the current Sunterra operation along PR 234?

Has Sunterra met all of its licence conditions and requirements; what resulting reports are available, what if any issues or concerns occurred, what mitigative actions were taken and what were the outcomes?

Excerpt from Report: *Potential adverse environmental effects of the proposed peat harvesting development assessed to be major in the environmental assessment included: loss and disturbance of soil (harvested peat) and potential accidents, including fire and explosions or vehicle collisions during the transportation of peat.*

Additional environmental effects assessed to be potentially moderate included: increased dust and particulates; loss of small ponds/streams; increased sediment levels in surface water; loss of terrestrial vegetation; disturbance to bird habitat (olive-sided flycatcher); disturbance to areas of interest; impacts to soil and surface water quality associated with spills and hazardous substance release; and disturbance to public well-being associated with increased traffic.

Fisher River Cree Nation Comments:

There is no mention in the report of there being any moderate or major impacts on wildlife, particularly moose, nor mention of the potential impact on other big game, fur bearing animals or fish.

In our opinion the cumulative effects of proposed developments along with other peat developments under review and the potential for additional developments on the large number of existing quarry leases in the Washow-Fisher Peninsula will be very significant and likely irreversible, or at the very least not restorable for several generations.

The adverse impact on wildlife and fish and their habitats will have a significant adverse effect on the aboriginal and treaty rights of Fisher River Cree Nation members and on the quality of life and economic livelihood of members of Fisher River Cree Nation as well as of the numerous communities and cottage subdivisions dependent on or located in the area.

Excerpt from Report: *With mitigation and follow-up, the residual effects of the project for all of the potential adverse effects were determined to be insignificant.*

Fisher River Cree Nation Comments: The assessment report does not support this statement and nor does our research. We believe the assessment was incomplete as it failed to address the several issues identified in this letter, and therefore the above noted conclusion in the report is flawed.

Excerpt from Report: *Mitigation for potential adverse effects identified for the proposed peat harvesting development included a wide variety of design and proposed measures, regulatory requirements and management practices.*

Fisher River Cree Nation Comments: The report does not contain mitigation measures to address the loss of wildlife and fish and their respective habitat, disturbance to moose routes, adverse impact on moose populations, adverse impact on trapping, fishing and hunting activities

for sustenance as well as recreation, eco-tourism, adverse impact on aboriginal and treaty rights, adverse impact on plants required for traditional medicines and cultural purposes, adverse impact on economic opportunity potential as a result of the adverse impacts of peat operations on the new Fisher Bay Provincial Park, adverse impacts with respect to the potential for any new sustainable natural resource based eco-tourism economic initiatives.

Therefore, as we have already noted, the conclusions as to potential for adverse impacts are not valid.

Excerpt from Report: *Follow-up identified for the proposed peat harvesting development included a variety of inspecting, monitoring, record keeping and reporting requirements.*

Fisher River Cree Nation Comments: There are no follow-up plans in the report to address the adverse effects identified above.

3.4 PROJECT LOCATION

Excerpt from Report: *As the proposed project lies on Crown Land, there are no Certificates of Title available for the properties. However, Sunterra holds the mineral rights for the project areas under existing and pending Manitoba QLs ..*

Fisher River Cree Nation Comments:

The statement that " Sunterra holds the mineral rights under pending Manitoba QLs." is not correct from what we understand. We understand that Sunterra has applied for Quarry Lease areas referred to by the consultant as "pending leases" but the applications have not been approved nor are they being processed. Therefore Sunterra has no mineral rights nor any other legal rights or interests in the "pending QL" lands.

3.6 PROJECT COMPONENTS AND ACTIVITIES

Excerpt from Report:

3.6.1 Project Components

Main Access Roads: Several access roads will be required to provide access from PR 234 to the proposed peat harvesting developments at Bullhead, Little Deer Lake and Ramsay Point Bogs.

Fisher River Cree Nation Comments:

As previously mentioned, if the proposed roads are outside of the quarry leases, Fisher River Cree Nation must be consulted with respect to the Crown land applications for the road sites.

4.1.10 Aquatic Biota/Habitat

Excerpt from Report: *Aquatic biota and habitat, particularly fish and fish habitat are protected under the Fisheries Act. In discussions with Mr. Todd Schwartz of Fisheries and Oceans Canada (DFO) (29), it was determined that there was no data regarding fish habitat or known fish species within Little Deer Lake, the Ranger Lakes, or the tributary flowing from the south Ranger Lake to Lake Winnipeg. Therefore, it was suggested that all water bodies and watercourses be examined for fish and fish habitat availability (Appendix D).*

Aquatic biota assessment was completed during May 2011 by setting a 2 and 3 inch panel gill net at 10 locations on the Ranger Lakes within Ramsay Point Bog to determine the types and

abundance of medium and large bodied fish species inhabiting the area, as well as to obtain basic water quality and water temperature information within the study area.

Fisher River Cree Nation Comments:

It doesn't appear that the proponent has fully met the requirements of DFO who requested that "..... all streams, lakes and wetlands that are potentially impacted should be assessed for habitat quality and fish use. This means that proper fisheries assessments by qualified fisheries consultants should be done. Assessments of seasonal (spawning) and year round fish use should be made."

4.2.2 First Nations

***Excerpt from Report:** There are no First Nation communities located within the project or regional study areas, however, there are three First Nation communities located beyond the regional study area that have interest in the area. The Fisher River Cree Nation (Reserve No. 44 and No. 44A) and the Peguis First Nation (Reserve No. 1B and 1C) are located approximately 30 km northwest and 40 km west of the Ramsay Point, respectively. Both communities likely have traditional land use in the area and, as previously noted, the proposed development is located with the Peguis First Nation CIZ.*

Fisher River Cree Nation Comments:

The report recognizes that Fisher River Cree Nation has traditional land use in the area but no contact or consultation was made with our community by the proponent, which we find unacceptable.

6.4 SOCIO-ECONOMIC EFFECTS ASSESSMENT

6.4.1 Economic Conditions

The economy in the regional area surrounding the proposed development is dependent on fishing, forestry, tourism and recreational related activities and government operations. The existing Sunterra Beaver Point Bog operation currently has a positive impact in the development area, employing 35 to 40 residents from the surrounding communities with an aggregate seasonal payroll in excess of \$1 million. Additionally, Sunterra supports local businesses by purchasing supplies and contracting local companies for service works (e.g. trucking, sewage and waste disposal) having a minimum total annual expenses of \$3 million with at least 50% of this spent within the Interlake area and another 25% within Manitoba. With the proposed peak operation of 282 ha beginning by 2015 Sunterra will continue to provide employment opportunities requiring approximately 43 to 48 employees. Therefore, the potential effect to the regional economy was determined to be positive (Table 13). As such no mitigation or follow-up activities are proposed.

6.4.2 Business Opportunities

Continued business opportunities for local contractors will include the contracts for harvesting merchantable timber, constructing the access roads with culvert installation, transporting harvested peat, disposal of sewage and domestic wastes as well as the eventual restoration. The potential effects were determined to be positive (Table 13).

Fisher River Cree Nation Comments to 6.4.1 and 6.4.2:

The potential positive effects anticipated by the proponent with respect to business opportunities would likely result in a negative effect if the assessment included the potential loss of the significant employment and economic benefits related to construction of new cottages,

recreational activities and purchases of the cottagers and campers, and the economic benefits from the growing tourism industry which would suffer irreparable damage if the pristine Fisher Bay Provincial Park and the vast wilderness area on the Washow-Fisher Peninsula east of the park was subjected to a number of peat mining operations.

The wetland ecosystem economic values must be included in the economic impact assessment of the proposed peat mine developments. The consultant's report does not attribute any values to the existing ecosystems.

The table previously referred to in this letter, from *Counting Canada's Natural Capital: Assessing the Real Value of Canada's Boreal Systems* by Mark Anielski and Sara Wilson, the Pembina Institute identifies the value of wetlands and of peatlands in terms of 2002 dollar values.

6.4.4 Noise and Vibration

Construction and operation activities including the use of heavy equipment and transport trucks will result in increased noise and vibration levels in the local area, as well, the transport trucks along PR 234 will result in increased noise and vibration. The residual effects of noise and vibration during construction and operating were determined to be not significant (Table 13).

6.4.6 Aesthetic Values

The proposed peat operation is located in a relatively remote location with very few local residents and is unlikely to be seen by regional visitors. The residual effect of decreased aesthetics was determined to be not significant (Table 13).

6.4.7 Areas of Interest

..... Additional land uses in the regional study area includes.... cottage development along the shore of Lake Winnipeg ... Residual environmental effects of the proposed development site on land use and areas of interest were evaluated to be not significant (Table 13).

6.4.8 Recreation/Tourism

The areas along the shoreline of Lake Winnipeg within the regional study area for the proposed peat harvesting development are prominent tourism and recreation areas. The residual effect was determined to be not significant (Table 13).

Fisher River Cree Nation Comments to 6.4.4, 6.4.6, 6.4.7 and 6.4.8:

We are of the view that the proposed developments will have a significant adverse impact on existing tourism and recreational cottages and camping activities in the area, as well as on any expectations to grow those industries.

We also are of the view that the proposed developments will adversely affect the value of cottages and cottage lots in the areas along PR 234 as well as in the Bay River subdivision at Fisher Bay due to the negative impact peat developments will have on the Fisher Bay Provincial Park. The aesthetic values that attracted cottage lot buyers will be adversely affected by the noise, dust and traffic from the peat operations.

6.7 CUMULATIVE ENVIRONMENTAL EFFECTS

Cumulative environmental effects are defined as effects that are likely to result from the proposed project in combination with the effects of other projects or activities that have been or will be carried out in the foreseeable future.

Fisher River Cree Nation Comments:

It is our opinion that the assessment should have included the cumulative effects of all peat quarry leases and licences in the Washow-Fisher Peninsula, not just the ones currently under EA review.

That would include the current Sunterra operation, leases currently undergoing EA approvals or appeals, valid and existing quarry leases for which an EA has not yet been applied, and quarry lease applications that have been submitted but which won't be processed until the moratorium is lifted. With respect to these, we would like to know:

- What is the total combined area of the actual leases?
- What is the total combined area of the study area (i.e. the area within 3 km of the QL boundaries)?
- What is the combined area of the regional study area (i.e. the area within 10 km of the QL boundaries)?

6.7.1 Scoping

Excerpt from Report: Surface Water Quality

Surface water quality in the region is generally good with the exception of recent algal blooms on Lake Winnipeg in Comments to elevated nutrient levels.

Excerpt from Report: Groundwater Quality

According to GWDRILL logs in the regional area, the groundwater is generally potable with no known exceedences of MWQSOG. Pristine groundwater quality is valued by Manitobans for consumption, industry and agriculture. The groundwater in the regional area is generally protected from impacts by the low permeability clay cover, as discussed in section 4.1.4, which forms a very good barrier between surface water and the underlying local bedrock aquifer.

Fisher River Cree Nation Comments: Re Surface and Ground Water

Has any testing been done to determine conclusively whether or not the groundwater sources are ecologically interconnected to the raised peat bogs, and whether any given peat bog is ecologically interconnected to another peat bog ecosystem.

If so, what are the results? If this has not been determined, will it be?

Excerpt from Report: Recreation/Tourism Economy

The recreation/tourism economy in the regional study area is growing in importance. The industry benefits from a pristine environment with abundant and diverse natural resources and a general absence of industrial or other commercial development.

Fisher River Cree Nation Comments:

We agree with this statement. The adverse impact of the proposed peat developments on the growing recreation/tourism industry in this region would be a major impact.

Excerpt from Report: Wildlife/Habitat

Native wildlife species play an important role in the recreation and tourism industry in the regional area. Additionally, hunting is one of the traditional land-uses by the First Nations.

Fisher River Cree Nation Comments:

We agree with this statement. The proposed developments would adversely impact the recreation and tourism industry, and the exercise of Fisher River Cree Nation members' treaty right to hunt, for the numerous reasons stated elsewhere in this letter.

Excerpt from Report: Quality of Life

The rural quality of life is of value to Manitobans. The quality of life is characterized by a remote setting with open spaces, peace and quiet, clean air, water and soil, and a general absence of industrial or other commercial development.

Fisher River Cree Nation Comments:

The proposed developments would adversely impact this valuable quality of life in a major way.

Excerpt from Report: Spatial Boundary

The spatial boundary for the cumulative effects assessment is the regional study area, which includes the area within 10 km from the edges of the Bullhead, Little Deer Lake and Ramsay Point Bogs and the existing facility at Beaver Point Bog as previously described. This covers a total area of approximately 128,208 ha (Figure 2).

Fisher River Cree Nation Comments:

What would be the total area if existing quarry leases for all lease holders were included in the assessment as they should have been? A map should be provided to show how much of the peninsula would not be impacted by all of the existing, proposed and potential developments.

Excerpt from Report: Existing Projects and Activities

The proposed peat development is located in a relatively isolated area in the Interlake area of Manitoba. The following is a list of known development, projects and activities in the cumulative effects spatial boundary:

- *Sunterra; existing Beaver Point Bog Peat Mine*
- *Beaver Creek Provincial Park*
- *Beaver Creek Bible Camp*
- *Beaver Creek transfer station*
- *Communities/Cottage Developments: Pine Dock, Matheson Island, Calders Dock (harbour), Bullhead, Little Bullhead, Leaside Beach, Beaver Creek and Pebblestone Beach*
- *Airports: Pine Dock and Matheson Island*
- *Commercial trucking along PR 234*
- *Road maintenance of PR 234 and park access roads*
- *Recreation including hunting, fishing and camping*

Fisher River Cree Nation Comments:

Some activities that are not included in the assessment report but should have been are:

- Hunting, fishing, trapping, gathering of traditional medicines, and other traditional activities by members of the Fisher River Cree Nation and other First Nation and Aboriginal peoples.
- Trapping by non-aboriginal peoples.
- Commercial fishing - Frog Bay fish camps

Potential (Rumored) Projects and Activities

The regional area has substantial peat reserves with much of the area parceled out through existing and pending quarry leases, thus there are several potential peat mine projects that may arise. These include potential peat mine developments by Premier Horticulture and Tourbiers-Lambert Inc. in addition to the other companies already noted to be developing in the area. However, at this time it is unknown if and or when any of these will be developed and therefore they have not been included as part of the cumulative effects assessment.

Fisher River Cree Nation Comments:

We do not accept the consultant's reasons for excluding the Premier, Tourbiers-Lambert and other potential peat mine developments referred to above, from the assessment. It should be noted that the Sunterra quarry leases, which are under application but are not valid or existing leases, were included. Why then were the valid leases not included?

It is our opinion that the assessment should have included the cumulative effects of all existing peat quarry leases and licences in the Washow-Fisher Peninsula, and as a result the potential effects would be assessed as major.

6.7.2 Analysis

Excerpt from Report: Cumulative Environmental Effects

Environmental effects of the proposed peat harvesting development project and environmental effects of other known and potential projects and activities occur within the cumulative effects assessment area (Table 14). As such, there is some potential for the effects of the proposed project to be cumulative with the effects of other projects and activities within this area. While these projects and activities overlay in time most of them do not overlap in space. Therefore most of the potentially cumulative effects are negligible and none of the cumulative effects identified were assessed as major.

Fisher River Cree Nation Comments:

We strongly disagree with the statement that the potential cumulative effects are negligible. We find the assessment flawed in that a large number of valid and existing quarry leases were not considered in the assessment despite the fact that the Sunterra quarry leases, which are under application but are not valid or existing leases, were included.

It is our opinion that if the assessment considered the cumulative effects of all existing peat quarry leases and licences in the Washow-Fisher Peninsula, as well as other consideration we have noted throughout this letter, the potential effects would be assessed as major.

Excerpt from Report: 6.7.4 Significance

Potential cumulative effects associated with the proposed peat harvesting development were determined to be not significant.

Fisher River Cree Nation Comments:

In our opinion the report does not support this statement. Based on our research and considering the numerous issues not addressed by the proponent, it is our conclusion that potential cumulative effects associated with the proposed peat development will be significant.

6.8 SUSTAINABILITY

Excerpts from Report:

6.8.1 Principles of Sustainable Development

Integration of Environmental and Economic Decisions

Stewardship

The economy, environment, human health and social well-being should be managed for the equal benefit of present and future generations. Manitobans are caretakers of the economy, the environment, human health and social well-being for the benefit of present and future generations. Today's decisions are to be balanced with tomorrow's effects.

Sunterra is committed to long-term management that provides economic benefit while ensuring the integrity of the development. The proposed peat harvesting development will provide approximately 43 to 48 jobs and additional contracts (transporting) over the 30 years that the production life will be extended. The natural soil conditions at the site will protect potential underlying groundwater sources. Site design will protect surface water quality and surrounding wildlife habitat. Long term adverse effects on the environment, human health, and social well-being are expected to be negligible.

Fisher River Cree Nation Comments:

In our opinion the proposal does not meet the test of this principle as it adversely affects the economy, environment and potentially human health and social well-being.

Shared Responsibility and Understanding

Manitobans should acknowledge responsibility for sustaining the economy, the environment, human health and social well-being, with each being accountable for decisions and actions in a spirit of partnership and open cooperation. Citizens share a common economic, physical and social environment and should understand and respect differing economic and social views, values, traditions and aspirations. Manitobans should consider the aspirations, needs and views of the people of the various geographical regions and ethnic groups in Manitoba, including Aboriginal peoples, to facilitate equitable management of Manitoba's common resources.

Sunterra will be responsible for the day-to-day operations at the proposed peat harvesting development and will be responsible for keeping the general public informed about issues, actions, and decisions relevant to the facility.

Fisher River Cree Nation Comments:

In our opinion the proponent has failed with respect to this important principle, namely that "Manitobans should consider the aspirations, needs and views of the people of the various geographical regions and ethnic groups in Manitoba, including Aboriginal peoples, to facilitate equitable management of Manitoba's common resources." as there was no consultation with nor any consideration given to the needs and views of the Fisher River Cree Nation or other aboriginal peoples.

Conservation and Enhancement

Manitobans should maintain the ecological processes, biological diversity and life-support systems of the environment, harvest renewable resources on a sustainable yield basis, make wise and efficient use of renewable and non-renewable resources, and enhance the long-term productive capability, quality and capacity of natural ecosystems.

The proposed development will protect existing potential wildlife and fish habitat areas by creating buffer zones around water bodies and water courses within the development area. Additional measures, such as maintaining flow connectivity at crossings and ensuring protection against erosion and sedimentation, will be included in all stages of construction and development.

Fisher River Cree Nation Comments:

In our opinion, the proposed development is contrary to this principle.

It is our opinion as previously stated, that the proposed development will adversely impact the ecological processes, biological diversity and life-support systems of the environment; that the harvest of peat resources can not occur on a sustainable yield basis, that the proposed development does not make wise and efficient use of renewable and non-renewable resources, and adversely impacts rather than enhances the long-term productive capability, quality and capacity of the natural ecosystems.

9.0 CONCLUSIONS

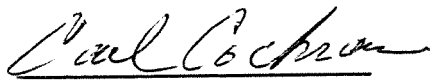
Excerpt from Report:

The proposed peat harvesting operation at Bullhead, Little Deer Lake and Ramsay Point Bogs, will not likely result in significant adverse environmental effects based on the available information on the project, the environment, the assessment of environmental effects outlined in this EAP, the application of proposed mitigation measures and the conduct of required followup. Similarly, the cumulative environmental effects of the project in combination with the effects of other projects or activities that have been and will likely be carried out in the reasonably foreseeable future were determined to be not significant.

Fisher River Cree Nation Comments:


Our conclusions, as supported by our comments noted throughout this letter, are that the proposed peat harvesting operation at Bullhead, Little Deer Lake and Ramsay Point Bogs, **will likely result in significant adverse environmental effects.** Similarly, the cumulative environmental effects of the project in combination with the effects of other projects or activities that have been and will likely be carried out in the foreseeable future **will be significant.**

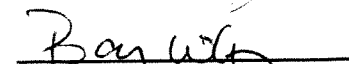
FISHER RIVER CREE NATION


Councillor Carl Cochrane


Councillor Darrell Thaddeus


Chief David Crate


Councillor Dion McKay


Councillor Barry Wilson

c. c.

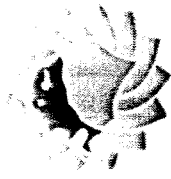
Minister of Conservation, Gord Mackintosh, Province of Manitoba

Chief Dave Traverse, Kinonjeoshtegon

Chief Glenn Hudson, Peguis

Lorne Cochrane, Indigenous Management Group

Harley Jonasson



green
PARTY OF MANITOBA

Green Party of Manitoba
Box 26023, 170 Maryland,
Winnipeg, MB, R3G 3R3
(366) 742-4292 (toll-free)
(204) 433-2331
www.GreenParty.mb.ca

July 24, 2012

Darrell Ouimet, Environment Officer
Manitoba Conservation, Environmental Approvals
123 Man St., Suite 160
Winnipeg MB, R3C 1A5

Dear Mr. Ouimet,

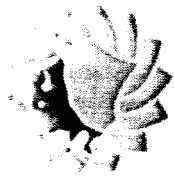
Re: Public Registry File #4254.10 – Sunterra Horticulture Inc. – Sunterra Peat Mine Development

This letter is sent as a formal objection to the granting of an *Environment Act* license for Sunterra Horticulture Inc. (Public Registry #4254.10), or any other peat mining operations in Manitoba.

When Manitoba passed the *Save Lake Winnipeg Act* it was promised that the new act would “protect wetlands” by “banning the rapid expansion of peat extraction from wetlands.”ⁱ As it presently stands however, the changes are having the exact opposite effect: encouraging companies to get any existing lease holdings into operation as soon as possible.

Peat mines require both: i) a peat quarry lease under the *Mine and Minerals Act*, and ii) an *Environment Act* license to operate. The *Save Lake Winnipeg Act* placed a two-year moratorium on the granting of new peat quarry leases, but it did nothing to existing leases and there are also many pending leases, which are on hold as long as the moratorium implemented by the *Save Lake Winnipeg Act* remains in place. The result is that we have at least 30,000 hectares in Manitoba that are already subject to existing peat quarry leases, and another roughly 20,000 hectares of peat quarry lease applications on hold due to the moratorium enacted through the *Save Lake Winnipeg Act*.ⁱⁱ To put this into perspective according to the Laval University Peatland Ecology Research Group: “around 17,000 ha of peatland are used for peat moss extraction in Canada, and an additional 5,000 ha will be harvested within the next 10 years.”ⁱⁱⁱ In other words if all of the existing peat quarry leases in Manitoba were put into production this would more than double the number of hectares in peat production across Canada – and this is to say nothing of the pending leases.

Under these circumstances, the companies holding existing peat quarry leases have attempted to rush them into production, and so the changes brought about by the *Save Lake Winnipeg Act* have in fact encouraged the rapid expansion of the peat industry in Manitoba.



green
PARTY OF MANITOBA

Green Party of Manitoba
Box 26023, RPO Maryland,
Winnipeg, MB, R3G 3R3
(366) 742-4292 (toll-free)
(204) 488-2331
www.GreenParty.mb.ca

The comments above apply equally to other peat mining operations in Manitoba, which have applied for *Environment Act* licenses since the implementation of ban on the granting of new peat quarry leases *vis-a-vis* the *Save Lake Winnipeg Act*.^{iv}

Particular to the present proposal (Public Registry File #4254.10), the proponent is applying for an *Environment Act* license on 10 separate quarry leases, but only four of the leases have been granted. The other six lease applications are still pending due to the *Save Lake Winnipeg Act* ban on granting new peat quarry leases. It seems problematic and presumptuous to grant a proponent a license on peat quarry lease holdings that have not even been granted.

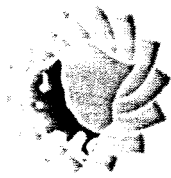
It also seems worth noting that in addition to the three separate peat bogs on the Washow - Fisher Peninsula that Sunterra is proposing to mine: Sun Gro Horticulture and Berger Peat were recently given licenses for peat mines on the Washow – Fisher Peninsula (located north of Gimli and Riverton). The individual mining operations will be harmful in their own right; the cumulative impact of so many mines in one area will be exponential.

We also need to make a distinction between the various types of peat lands (muskeg, bogs, fens, etc.). There is a tendency, particularly within the industry, to state that we have plenty of peat lands in Manitoba and so on a relative basis the impact of peat mining is not that significant. This fails to distinguish that different peat lands, provide different ecosystem functions. There are differences between muskegs, which tend to be located in more northern regions, and southern bog peat lands whose proximity to roads makes them more vulnerable to development.

All of the proposed peat mining operations will eventually drain into Lake Winnipeg, and because peat lands serve as natural filters that help to protect our waterways, expanded peat mining operations in the vicinity of Lake Winnipeg is liable to jeopardize the health of a Lake that is already in dire straits.

Peat lands take centuries to form, and these unique ecosystems create habitat for equally unique species such as orchids and carnivorous plants. They also serve as important winter habitat for moose, as well as habitat for various other species. Perhaps most importantly undisturbed peat lands store vast amounts of carbon, helping to mitigate against climatic impacts from increasing greenhouse gas emissions that are causing global warming.

Peat lands are also important to First Nations people in the area, and this has been something that has been raised by the technical advisory committee in comments on other recently licensed peat mines in Manitoba.^v



green
PARTY OF MANITOBA

Green Party of Manitoba
Box 25023, RPO Maryland,
Winnipeg, MB, R3G 3R3
(366) 742-4292 (toll-free)
(204) 433-2331
www.GreenParty.mb.ca

Cottagers in the area have also raised objections, and the *Environment Act* licenses referenced above have been subject to appeals by both cottagers and First Nations. The Minister of Conservation, the Honourable Gord Mackintosh, has recently announced that he will not be deciding on these appeals or on whether to issue an additional license to Sun Gro to mine peat inside Hecla/Grindstone Provincial Park until he has more time to study the matter further and in conjunction with each other.^{vi}

Clearly we need a holistic comprehensive strategy before we issue new *Environment Act* licenses for peat mining operations, because if we continue to issue new *Environment Act* licenses then the purpose of the implementing a "peat moratorium" and developing a peat strategy become increasingly moot. It would only be prudent for this Government to make it a matter of policy not to grant any new *Environment Act* license for peat mines in Manitoba until such a comprehensive and holistic policy on peat lands is developed.

We also need to investigate the possibility of buying back some of the peat quarry leases that have been issued, starting with those that are located in the most sensitive habitats and/or are closest to shorelines or other riparian areas.

It is for all these reasons we request that no new *Environment Act* licenses for new peat mining operations be granted.

Sincerely,

James Beaddome, Leader, Green Party of Manitoba
leader@greenparty.mb.ca

CC: Gord Mackintosh, Minister of Conservation, Greg Selinger, Premier of Manitoba



green
PARTY OF MANITOBA

Green Party of Manitoba
Box 26023, RPO Maryland,
Winnipeg, MB, R3G 3R3
(866) 742-4292 (toll-free)
(204) 433-2331
www.GreenParty.mb.ca

ⁱ Government of Manitoba News Release “Premier Unveils Plan To Save Lake Winnipeg” June 2, 2011, online: <<http://www.gov.mb.ca/chc/press/top/2011/06/2011-06-02-105000-11639.html>>.

ⁱⁱ Manitoba Wildlands “Reality Check #32 – How Many Peat Quarry Leases in Manitoba” January 13, 2012, online: <http://manitobawildlands.org/gov_rc32.htm>.

ⁱⁱⁱ Laval University Peatland Ecology Research Group “Peat Industry,” online: <<http://www.gret-perg.ulaval.ca/industrie-gret.html?&L=0Firef...cada1c72a857c929118957c47>>.

^{iv} See Public Registry File #5548.00 - Sun Gro Horticulture Canada Ltd.- Hay Point Peat Mine Development, online:

<http://www.gov.mb.ca/conservation/eal/registries/5548sungro_haypoint/index.html>.

^v See Public Registry Summaries for file numbers: #5496.00, online:

<<http://www.gov.mb.ca/conservation/eal/archive/2011/summaries/5496.pdf>>; #5507.00, online: <<http://www.gov.mb.ca/conservation/eal/archive/2011/summaries/5507.pdf>>; and #5461.00, online

<<http://www.gov.mb.ca/conservation/eal/archive/2011/summaries/5461.pdf>>.

^{vi} Larry Kusch, “Decision on Peat Mine Delayed” Winnipeg Free Press July 1, 2012, online: <<http://www.winnipegfreepress.com/local/decision-on-peat-mine-delayed-160933835.html>>.

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of Heather and Waldemar Erickson
Sent: July-20-12 6:33 PM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

Re: Sunterra's proposal #4254.1, Sun Gro's proposal #5548, Sun Gro's license #2964, Berger's license #2969, Jiffy Canada's license #2941.

Peat is not a renewable resource and is essential to a healthy climate. Peat bogs must be protected at all costs. By stripping our boreal forests of large areas of bogs, we are contributing to the decline in our water fowl, moose, unique flora, and air quality. Netley Marsh is dead due to man's interference with the flow of rivers, pollution, and disregard for the natural order. Stop raping our heritage of its pristine boreal areas. There are areas of this province that no longer support moose populations, no longer provide nesting areas for waterfowl, and the continual degradation of natural spaces is ruining our heritage. Do not issue licenses to strip away peat for a paltry sum. I have seen the results of the stripping of peat from the land. What you are left with is a wasteland, not suitable for growing anything, not part of the natural order. You cannot restore it for generations, if ever.

This letter was created with the use of an online letter writing tool at wildernesscommittee.org

July 23, 2012

Heather Hinam, Ph.D.
President/CEO
Second Nature Adventures in Discovery
Box 501
Riverton, Manitoba, R0C 2R0
heather@discoversecondnature.ca

Darrell Ouimet
Environmental Assessment and Licensing Branch
123 Main St.
Winnipeg, Manitoba, R3C 1A5

Re: File 4254.10 – Sunterra Peat Mine Development Proposal

Dear Mr. Ouimet,

I am writing to express my continued frustration with the Provincial Government's policy regarding the licensing of new peat mine operations in Manitoba, specifically the consideration of the expansion of peat mining operations by Sunterra in the Beaver Creek Region.

As both a long-time resident of in the area and an experienced naturalist, I find it disturbing to think that a government who has publically stated their commitment to restore the health of Lake Winnipeg and mitigate the causes of climate change would be willing to grant leases in the Grindstone and Beaver Creek region that would see as much as 128,000 ha of carbon storing and watershed filtering peatland irreparably destroyed.

Peatlands are infinitely more valuable to our province and the world in general, when left intact as functioning ecosystems. The Government of Manitoba has acknowledged their importance through the Save Lake Winnipeg Act. However, since it was enacted, there have been more mine development proposals than there were before. Do we really want to let these applications slip under the radar of this loop-hole ridden act? With all of the peat licenses that have been cropping up in the last year, it's hard to believe there is even a moratorium in place. It's like watching vultures swooping in while they think they still can to snap up as much of this fragile ecosystem as possible before a peat management strategy is in place. It's as though there is a run on peat suddenly now that other provinces are realizing the destructive nature of this industry and making harder for companies to get licenses. Do we really want Manitoba to become the go-to province for environmental destruction?

What I, and the over 290 signatories of the attached petition are asking is for the government to respect take to heart their commitment to a greener future for Manitoba and ban all new peat mines regardless of when the leases were granted, including expansions like the one proposed by Sunterra, before we lose a vital filter in the fight to save Lake Winnipeg and a priceless carbon storehouse that is offsetting the seemingly unchecked rise in CO₂ in our atmosphere.

Bogs and fens can hold vast amounts of water (up to 20 times the weight of the *Sphagnum*) and play a critical role in trapping or filtering nutrients and other pollutants from runoff before it has a chance to make it to

the lake. In fact, its filtering ability is one of the reasons companies harvest peat in the first place. Even more importantly, peatlands are critical carbon sinks. Although they only cover 12% of the land area, Canadian peatlands hold somewhere around 147 gigatonnes of organic carbon, over 50% of the all the carbon found in our soils. Oxidizing just 1% of the peatlands in our country would release 10 times the amount of CO₂ that Canadians put into the atmosphere in one year. Manitoba has the largest percentage of boreal wetlands in western Canada, storing some of the largest concentrations of carbon and we have some of the laxest regulations when it comes to its preservation. This needs to change and rejecting all new mine proposals is your chance to make a positive step forward toward truly becoming a "leader in peatlands preservation," as Premier Selinger has stated he would like the province to be.

Mined peatlands do not recover, because once the site is drained, the main peat-producing plants (*Sphagnum* sp.) cannot re-establish itself in this drier, more compact land and is easily pushed out by encroaching trees and other vegetation. Mined peatlands are no longer able to store and filter water or carbon to anywhere near the same degree as an untouched ecosystem. Once the damage is done, there is no going back. This is not a sustainable resource, which is why Sunterra wants to expand their operations in the first place. The original mine is going to be tapped out soon. Are we really going to let them and other companies in the area dig new holes until there's nothing left on the peninsula?

I am concerned that the government is not considering the cumulative effects of all of these peat leases in one place. Mines are not a bubble. Each hole you carve into the fabric of that peninsula ripples effects throughout the ecosystem, into the lake and into our atmosphere.

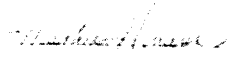
I understand that local municipal governments are supporting these proposals as a source for jobs for their residents and are painting us cottagers as 'outsiders' who shouldn't have a say in 'their' community. However, cottagers in Beaver Creek, Mill Creek, Grindstone and Little Deer as well as 'local' residents of Pine Dock and Matheson Island will be the ones to bear the brunt of the destruction on a daily basis with increased truck traffic, reduced quality of life through destruction of the natural habitat and the constant noise of the processors destroying the serenity of their wilderness home. Residents of the Peguis and Fisher River First Nations will see the destruction of their traditional lands and severe displacement of wildlife with increased habitat fragmentation all for jobs that are few, seasonal and not sustainable. The effects of these mines will be felt well beyond the boundaries of these municipalities in the runoff into the lake and with increased CO₂ in the atmosphere that will be felt worldwide.

If the Province of Manitoba truly wants to become a leader of 'green' technology and practices as suggested in their new 'Tomorrow Now' plan, I would encourage them to start thinking outside the box, away from old, unsustainable practices such as peat mining and looking towards sustainable technologies that will keep people employed in the long term. If they are looking for something within the horticultural industry, may I suggest exploring industrial-scale composting? Waste is a resource we never run out of, and it would employ more people for the long-term than peat mining.

So, on behalf of myself and the signatories of the attached petition, I would like to strongly urge you to reject the Sunterra expansion (file 4254.10) and put an immediate freeze on all other pending peat mine leases in the province. I would like to add my voice to the growing chorus calling for a comprehensive assessment of the ecological value of peatlands to our province and the development of a peatlands strategy that clearly lays out steps for their preservation. I would also like to urge the government to explore alternative industries as ways to create lasting jobs for rural communities instead of these short-term cash grabs.

I would like to thank you for this opportunity to comment on this proposal. I hope that you consider the ramifications of moving forward with this mine seriously before giving any approval.

Sincerely,

A handwritten signature in cursive script, appearing to read "Heather Hinam".

Heather Hinam, Ph.D.

cc. Hon. Peter Bjornsson, MLA

cc. Hon. Greg Selinger, Premier

cc. Hon. Gord MacKintosh, Minister of Conservation and Water Stewardship

Helios Hernandez

[REDACTED]
[REDACTED]

July 24, 2012

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

Dear Mr. Ouimet:

I have reviewed EAL File 4254.10, the proposed Sunterra Peat Mine Development in Hecla/Grindstone Provincial Park, and offer the attached comments. These comments are similar and expand on, some comments that I provided on February 3, 2012 to EAL File 5548.00 for the proposed Sun Gro Hay Point Peat Mine Development in Hecla/Grindstone Provincial Park.

I do not support the Sunterra proposal and I request that it not proceed for further consideration. If the project proceeds for further consideration, however, I request that a Clean Environment Commission Hearing be held to address the issues and concerns associated with this proposal, as detailed in my comments. Thank you.

Yours truly



Helios Hernandez

Encl.

Helios Hernandez

July 24, 2012

**SUNTERRA HORTICULTURE (CANADA) INC. – SUNTERRA PEAT MINE
DEVELOPMENT - EAL FILE # 4254.10**

Submitted by Helios Hernandez

Implications of Peat Mining to Lake Winnipeg

The issues of (a) the effects of increased peat mining to Lake Winnipeg, of which the Sunterra application is only one proposal, and (b) compliance with *The Save Lake Winnipeg Act* (S.M. 2011 c.36, (<http://web2.gov.mb.ca/laws/statutes/2011/c03611e.php>)) have been widely discussed in the media.

Details are available in the *Winnipeg Free Press*: in print January 6 on page A9 (also online at <http://www.winnipegfreepress.com/local/peat-mine-proposed-for-manitoba-park-136796553.html>); in print January 30, 2012 on page A4 (also online at <http://www.winnipegfreepress.com/local/mining-peat-in-lakes-watershed-opposed-138310029.html>); and online dated January 10, 2012 (<http://www.winnipegfreepress.com/breakingnews/Grits-Greens-join-opposition-to-peat-mine-plans-137035038.html>); in print on page A16 and online at <http://www.winnipegfreepress.com/local/peat-mining-loophole-irks-wilderness-group-163273066.html>. In addition CBC News, Manitoba Region on February 2, 2012 (<http://www.cbc.ca/news/canada/manitoba/story/2012/02/01/mb-peat-mines-manitoba.html>) reported that the concerns identified in these news reports were also raised within the provincial government. I agree with and support the concerns expressed in these news stories.

A Clean Environment Commission review of these issues needs to be conducted before development proceeds on any peat mine, including the Hay Point site in Hecla/Grindstone Provincial Park, this Sunterra proposal, and the two Environment Act licenses issued in 2011 that are under appeal.

Further, since I submitted my February 2012 comments concerning Sun Gro's application in Hecla/Grindstone Provincial Park, Manitoba released its new proposed Green Plan, "TomorrowNow" on June 20, 2012 (<http://www.gov.mb.ca/chc/press/top/2012/06/2012-06-15-104600-14613.html>). Pages 24-29 of the Green Plan focus on water stewardship and saving Lake Winnipeg, and include a commitment on page 29 to develop "Canada's first comprehensive peatlands stewardship strategy". It would be a travesty to issue any additional peat mine development licences before such a strategy is developed. Issuing licences would strongly constrain the entire process and bring into ridicule the concept of how "comprehensive" a peatlands plan would in fact be, given that most of the peat mining sites would already have been approved for development before their potential roles in water stewardship and environmental benefits had been properly considered.

Clean Environment Commission review of peat mining, as I propose in this submission, would go a long way to helping to develop a comprehensive peatlands plan.

Comments Related to Mining Developments

Peat Lease Tenure

In my February 2012 comments to the Sun Gro Hay Point proposal (EAL File 5548.00), I raised the issue of peat lease tenure, and the length of time proponents held leases prior to applying for their development without conducting necessary and detailed site studies. It should be noted that Sunterra only holds four quarry leases (QLs-1291, 1134, 1323, & 1406), three pending quarry leases (pending QLs 2401, 2390 & 2391), plus applications for two additional quarry leases (2409 & 2410).

A more fundamental issue, however, is the lack of an opportunity for public review and comment when a lease is applied for and land tenure is sought. Such reviews are standard for many, if not most, development projects (e. g., transmission line or highway routings, sewage lagoons, dams, etc.). Clean Environment Commission consideration of the process by which peat leases (and possibly other mining rights) are allocated would allow development of a process that balances the interests of the public and developers, to determine what environmental and other conditions (e.g. length of baseline ecological studies, restoration research, etc.) should be required as part of a land tenure document.

Issuance of the three pending and two applied-for Sunterra quarry leases mentioned above should not occur until a final decision has been made on the Sunterra proposal, following Clean Environment Commission review of the issues I have raised.

Closure Plan

The Mine Closure Plan forms Appendix C of the Sunterra Environment Act Proposal and is discussed briefly on pages 26, 63, and 66 of the EA Proposal. This material may meet the requirements of *The Mines and Minerals Act*, but I consider it inadequate for environmental assessment purposes. It lacks any detailed discussion of restoration methods, and it does not provide any Manitoba-specific data or documentation of the successes or failures of restoration efforts.

No literature cited or references about restoration are provided in either the Sunterra Mine Closure Plan or the Sunterra EA proposal, other than to state (see EA proposal pages 26 & 66): "*Fully harvested areas will be restored based on the experience gained by Sunterra through the guidance of CSPMA and restoration research and following the requirements of The Preservation and Reclamation Policy of the CSPMA.*"

The Canadian Sphagnum Peat Moss Association (CSPMA) website (<http://www.peatmoss.com/pm-restguide.php>) contains the following document:

Quinty, François and Line Rochefort. 2003. *Peatland Restoration Guide, Second Edition*. Canadian Sphagnum Peat Moss Association, St. Albert, Alberta and New Brunswick Department of Natural Resources and Energy, Fredericton, New Brunswick. 106 pp. (<http://www.peatmoss.com/pdf/Englishbook.pdf>).

This guide provides information on restoring mined peat sites based on research conducted in 16 sites (seven in southern Quebec, seven in eastern New Brunswick and one each in Alberta and Saskatchewan). Research started in 1993. A search of the guide reveals not a single mention of Manitoba. Although I detailed various concerns and questions in my February 2012 submission regarding the Sun Gro Hay Point project (EA File 5548), at least that application made mention of some limited research in Manitoba in the Elma area.

Given the 70 years of peat mining in Manitoba (see page 10 of the Sunterra Environment Act Proposal), the peat mine industry should have been required to conduct studies of restoration of former peat mines. Peat mine closure plans should be required to provide more substantial ecological information, particularly citing Manitoba data, rather than data from elsewhere where ecological conditions may differ significantly. Only a Clean Environment Commission review can fully address the complex issues involved, and determine what mine closure plans should contain, balancing the needs of the industry, the environment and society.

Adequacy of Site Data

As I mentioned in my February 2012 comments to the Sun Gro Hay Point proposal (EA File 5548), similarly the Sunterra EA proposal also lacks sufficient biological and ecological information. Only brief reconnaissance level surveys were conducted in September 2010 and in May and June 2011. Little information is provided as to the length of time that these surveys were conducted. Although reconnaissance level surveys, as carried out over spring, early summer and early fall may meet the minimum legal requirements, they are not adequate to obtain a complete ecological description of the area to be affected by peat mining. More details should be provided in the Proposal on how the studies were carried out.

Also, gathering data over several years would allow for year-to-year comparisons, and would capture species that present themselves only sporadically or under certain environmental conditions.

Woodland Caribou

The Sunterra EA proposal (page 43) regarding the boreal population of woodland caribou states: *"Though not categorized as a species of conservation concern in Manitoba, this population of woodland caribou is listed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) as threatened as a result of habitat loss and increased predation"*, and page 104 includes Manitoba's *Endangered Species Act (ESA)* in its list of Manitoba legislation applicable to the Sunterra EA Proposal.

Examination of the Regulations passed under the ESA confirms that the boreal populations of woodland caribou have been listed as "Threatened" under Manitoba's ESA since June 2006.

Climate Change and Implications for Design Standards

The Sunterra EA Proposal relies on data from Pine Dock (page 32) to describe the climate of the peat mine site, and it relies on Manitoba Infrastructure and Transportation standards of 1 in 20 events (page 14) to design culverts and other drainage systems. Some of these data are the latest available climate "normals" but they cover the period 1971-2000. As has become evident, 2001-2010 was a decade with very variable weather, including many localized storms (for example see a recent column by Gwynne Dyer: <http://www.winnipegfreepress.com/opinion/westview/wilder-weather-if-you-like-161889215.html>). There appears to be a need for new "normals", or larger contingency margins, to address the increased likelihood of unforeseen weather events with greater extremes than was considered "normal" in the past. As discussed in the section "*Mine Tenure*" above, the Clean Environment Commission is the venue to address requirements for site-specific data as well as the need for more appropriate design standards.

Cumulative Impacts

In its Environment Act Proposal, Sunterra conducted a “*Cumulative Effects Assessment*” (pages 89-97) and concluded (page 109) that: “*The proposed peat harvesting operation at Bullhead, Little Deer Lake and Ramsay Point Bogs, will not likely result in significant adverse environmental effects based on the available information on the project, the environment, the assessment of environmental effects outlined in this EAP, the application of proposed mitigation measures and the conduct of required followup. Similarly, the cumulative environmental effects of the project in combination with the effects of other projects or activities that have been and will likely be carried out in the reasonably foreseeable future were determined to be not significant.*”

In my professional experience as an ecologist involved with impact assessment, project development assessments rarely, if ever, conclude that cumulative effects are significant, and thus that a project should not proceed. For example, if this application were for allocating homesteads in the Red River Valley, at what point would a cumulative impact assessment lead to the conclusion that the next homestead approved would result in the destruction of the Manitoba’s original tall grass prairie? Cumulative impact assessments were not in place when the Red River Valley was settled. As a result, intensive efforts have been under way since 1992 to establish a Tall Grass Prairie Preserve in the Tolstoi/Gardenton area, on land that is widely acknowledged to be, at best, on the margins of the original prairie.

To avoid a similar result with Manitoba’s peatlands, there is a need to develop a comprehensive process for assessing cumulative impacts of development proposals, to avoid a situation where approval of a series of proposals results in “*destruction by insignificant increments*”. The CEC must play an important role in this process, to meet the intent of Manitoba’s Green Plan (page 29) to develop “*Canada’s first comprehensive peatlands stewardship strategy*”.

Aboriginal Rights (An Obligation of Government, Not Development Proponents)

Sunterra has demonstrated that it has attempted to obtain information from First Nations regarding traditional activities in the area. However, the Constitutional obligations, as detailed in many Supreme Court of Canada decisions beginning with the “Sparrow” case in 1990, are the duty of the Crown (Manitoba and Canada), not development proponents. The Government of Manitoba needs to provide information on the Aboriginal consultations (First Nations and Métis) that have been conducted to date before the Sunterra application can be considered.

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of Henriette Schellenberg
Sent: July-20-12 2:44 PM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

I am very concerned about the proposed new peat mines: #2941, #2969, #2964, #5548, #4254.1 These areas of peat bogs act as natural water filtration for our lovely but suffering Lake Winnipeg, which needs all the help it can get. Peat bogs are also not considered a renewable resource but are so important in storing vast amounts of carbon. Please don't allow these mining proposals!

Thank-you!
H. Schellenberg

This letter was created with the use of an online letter writing tool at wildernesscommittee.org

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of Henry Huber [REDACTED]
Sent: July-24-12 11:26 AM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

Henry Huber, Block 1 Lot 1, Beaver Creek, Grindstone Provincial Recreation Park, Manitoba.

Attention: Conservation and Water Stewardship Minister Gord Mackintosh,

My wife Barbara and I have been cottage owners at Beaver Creek since 1991 (part of Grindstone Provincial Recreation Park) and we and our family are not in favour of any new peat mine operations or expanded peat moss operation on and near Manitoba Highway 234 where our cottage is located. This would include the following proposals or licenses already issued:

Sunterra's proposal #4254.1

Sun Gro's proposal #5548

Sun Gro's already issued license #2964

Berger's already issued license #2969

Jiffy Canada's already issued license #2941

One of my favourite activities when I am at our Beaver creek family cottage is to walk into the peat bog in behind the Beaver Creek dump. I have been there many times to observe and photograph unique plants, commune with nature, fish and take my children in for a wilderness experience like no other. It takes me about an hour to walk in and transports me into another world which is full of interesting plants such as mosses, lichens, flowers and where there is land, some trees and in this case 5 small inland lake where the water is pure as it has been filter by many layers of peat and therefore is a dark brown colour. If you take a glass of the this water and hold it to the sun, it is a beautiful amber gold colour like a good scotch. The Scottish distillers make of the finest scotch in the world using similar peat water to make that world famous whiskey.

I currently have a Mexican friend who is a birder visiting me at Beaver Creek and yesterday we walked into the Beaver Creek bog to observe this marvel of nature as well as fish in the lakes. Once in the bog there is only silence as there are few birds in there and it is over a kilometer from Highway 234. As one walks along it is like walking on sponge and everywhere one looks there are interesting plants to observe.

I will mention a few that I observed and photographed yesterday. The canivorous pitcher plant is now in season and we saw and photographed many of them. They are a unique plant with a number of pitcher shaped vessels at it's base to capture insects. Eskimo cotton that the Inuit used to harvest and make wicks for their oil lamps and my very favourite, a small lichen type plant in vibrant red that I think is called the British Grenadier or British Soldier along with many other mosses, ferns, lichen and other plants.

When we got to the first lake we assembled our rods and with a few minutes I pulled in a 3 or 4 lb Jack fish. A few hour later we had 5 to take home for a great fish supper.

Minister Macintosh, my bog is one of the areas that is to get a strip peat mine operation. This will impact me personally and I am elaborating on the harm it will do to our environment below.

Minister Macintosh, if you have never been in a Manitoba bog, I would request that you visit one. Should you wish to visit the Beaver Creek bog, I would be happy to give you a tour. All you would need are some rubber boots.

So Minister Macintosh, above I have outlined how a local strip peat mine will remove an important retreat where I can commune with nature from my life.

Below, the following points summarize my concerns about strip peat mining and its impact on all Manitobans.

Lake Winnipeg is the most endangered great lake in Canada, struggling with disconcerting water quality issues. Peat bogs are a natural water filtration solution that improves the health of the lake. The recently enacted "Save Lake Winnipeg Act" banned further peat quarry permits. We should not allow these projects—located only a few hundred metres from the shores of Lake Winnipeg—to proceed.

Undisturbed boreal peat bogs store a vast amount of carbon, and the preservation of boreal peatlands is recognized as a globally important mechanism to mitigate climate change. It is not in the public interest to remove this essential planet protection tool.

Peatlands take centuries to form, and as such, are not considered a renewable resource. It is currently not possible to restore peat bogs to their original state after mining ends.

Allowing these mines will permanently alter the ecology of the area.


The lowland areas where peatbogs are found are important habitat for many rare and unique species, and are especially important for moose. Moose populations are declining and suffering due to a variety of causes, so additional moose habitat should not be disturbed. Peat is mined for horticultural and garden use. In a vast majority of applications, peat can be substituted with another soil additive instead.

Peat is not an essential product, like most metals that are mined.

The peat industry only employs a small number of people in Manitoba, with very modest royalties and taxes collected for the peat by the Manitoba government. The long-term damage to our environment will be more costly than the short-term economic gain.

So in summary, Minister Macintosh, my bog is one of the areas that is to get a strip peat mine operation. This will impact me and my family personally and I ask you to intervene and stop it

Regards,

Henry Huber, 

This letter was created with the use of an online letter writing tool at wildernesscommittee.org

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of Katherine Bergen
Sent: July-20-12 4:49 PM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

Please do not allow strip mining for peat. It is a destructive process that us destroying our natural ecosystems. There are suitable substitutes like compost and coir as well.

Thank you,
Katherine Bergen

This letter was created with the use of an online letter writing tool at
wildernesscommittee.org

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of Kathleen Clear [REDACTED]
Sent: July-20-12 2:44 PM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

Lake Winnipeg is the most endangered great lake in Canada, struggling with disconcerting water quality issues. Peat bogs are a natural water filtration solution that improves the health of the lake. The recently enacted "Save Lake Winnipeg Act" banned further peat quarry permits. We cannot allow these projects—located only a few hundred metres from the shores of Lake Winnipeg—to proceed.

Undisturbed boreal peat bogs store a vast amount of carbon. Peat mining causes great amounts of carbon to be released, which is bad for our climate and our chances of mitigating climate change. It is not in the public interest to remove this essential planet protection tool.

Peatlands take centuries to form, and as such, are not considered a renewable resource. It is currently not possible to restore peat bogs to their original state after mining ends.

Allowing these mines will permanently alter the ecology of the area.

The lowland areas where peatbogs are found are important habitat for many rare and unique species, and are especially important for moose. Moose populations are declining and suffering due to a variety of causes, so additional moose habitat should not be disturbed.

Peat is mined for horticultural and garden use. In a vast majority of applications, peat can be substituted with another soil additive instead.

Peat is not an essential product, like most metals that are mined. The peat industry only employs a small number of people in Manitoba, with very modest royalties and taxes collected for the peat by the Manitoba government. The long-term damage to our environment will be more costly than the short-term economic gain.

Sunterra's proposal #4254.1

Sun Gro's proposal #5548

Sun Gro's already issued license #2964

Berger's already issued license #2969

Jiffy Canada's already issued license #2941

This letter was created with the use of an online letter writing tool at wildernesscommittee.org

Dagdick, Elise (CWS)

From: Jac Comeau [REDACTED]
Sent: July-18-12 10:37 AM
To: Ouimet, Darrell (CON); Premier (LEG); mincon@leg.gov.mb.ca; Altemeyer, Rob (NDP Caucus) (LEG)
Cc: sacha@mbeconetwork.org; josh@mbeconetwork.org; Bill Martin
Subject: Peat Bog Mining - Environment Act Licences: 2969, 2964 & Proposal 5548.00

I'm a cottage owner on Highway #234. I'm opposed to the expansion of Peat mining in our province.

Allowing new Peat mining totally disregards the Province's own Save Lake Winnipeg Act, which states very clearly that a Moratorium *"applies despite any other provision of this Act and even if an application respecting a quarry permit or quarry lease was made before this section comes into force."*

This law was made for a reason - please stick to the science behind cleaning up Lake Winnipeg - as you claim to be committed to. Don't violate your own law for a short term gain of tax revenue - we'll more than pay for it in the long run with future generations having to clean up our mess. Peat bogs are helping a lake in trouble.

Please act on your own words. This is a bad idea!

Jac Comeau
[REDACTED]

D agdick, Elise (CWS)

From: Jan Johnson [REDACTED]
Sent: July-21-12 8:45 PM
To: Ouimet, Darrell (CON)
Cc: Altemeyer, Rob (NDP Caucus) (LEG); Innovation, Energy & Mines, Minister (LEG); Gerrard, Jon (Liberal Caucus) (LEG); Conservation and Water Stewardship, Minister (LEG)
Subject: peat extraction in Manitoba

Darrell Ouimet, environmental officer, Conservation and Water Stewardship Department

darrell.ouimet@gov.mb.ca

Dear Mr. Ouimet,

I am writing to express my grave concern regarding the possibility of the expansion of peat extraction operations near Beaver Point.

Besides being entirely at odds with the spirit and intent of the "Save Lake Winnipeg" act, the removal of peat in this sensitive ecological area will only serve to escalate the decline of Lake Winnipeg, and seriously impair the ability of this ecosystem to do its job ... cleanse the air of carbon released to the atmosphere, absorb excess storm water, reduce runoff and runoff turbulence, and filter undesirable nutrients and pollutants from entering waterways, most especially the very important, very at-risk Lake Winnipeg.

I entreat you and your department to do everything in your power to remedy and as far as possible, reverse the damages inflicted on this area by the extraction of resources, most particularly of peat. And certainly, and most urgently, to ensure in perpetuity that no expansion rights to this extraction are ever approved. Once this resource is removed, the natural functioning of this eco-system will be destroyed with irreparable harm to our planet.

Given the current government's claim of its commitment to a "Green Plan", I am dismayed that extension of these operations is even being considered. Any short-term, short-sighted financial "gain" can in no way be seen as compensation for the eventual horrific impact on our vital ecosystems.

In conjunction with knowledge-gleaning on this issue, in particular on the importance of maintaining peat bogs as the "lungs" of the planet, and how other jurisdictions have handled this, I urge the government to diligently examine the particulars of the Burns Bog in Metro Vancouver which has been preserved as an Ecological Conservancy Area since 2004.

Surely Manitoba, striving to be at the forefront of the "green movement" can at least match the foresight of a decision made by British Columbia almost a decade ago.

http://www.metrovancouver.org/services/parks_lscr/regionalparks/Pages/BurnsBog.aspx

Yours truly,

A very concerned constituent,

Jan Johnson
[REDACTED]
[REDACTED]

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of Jennifer Engbrecht [REDACTED]
Sent: July-24-12 8:36 AM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

To whom it may concern:

Please do not allow the following (or any) peat mining companies to deplete this non-renewable resource:

Sunterra's proposal #4254.1

Sun Gro's proposal #5548

Sun Gro's already issued license #2964

Berger's already issued license #2969

Jiffy Canada's already issued license #2941

With the "Save Lake Winni

This letter was created with the use of an online letter writing tool at wildernesscommittee.org

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of Jeffrey Jones [REDACTED]
Sent: July-24-12 8:46 PM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

Please respond to the many, many citizens who are deeply concerned about this issue.

This letter was created with the use of an online letter writing tool at
wildernesscommittee.org

Dagdick, Elise (CWS)

From: The Martins [REDACTED]
Sent: July-20-12 10:38 AM
To: Ouimet, Darrell (CON)
Subject: Sunterra opposition

As cottage owners at Victoria Beach on lake Winnipeg, we too are concerned about potential environmental ramifications of the Sunterra project.



All emails are for the intended recipient only so please do not share with others. Any daycare photographs are not to be posted online. Thank you.

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of Jim Whitworth [REDACTED]
Sent: July-21-12 9:37 AM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

To whom it may concern: At this late stage in the game and with all credible scientific bodies and scientists stating that global warming is a reality; it seems more than just a little ridiculous to allow peat to be mined in a any substantive manner. I believe we are supposed to be slowing down and if possible eliminating the emissions of green house gases not adding to them. I am referring to the Sunterra #4254.1 and Sun Gro's # 5548 proposals as well as those licences that have been already been issued to Sun Gro #2964, Berger's #2969 as well as Jiffy Canada's #2941. I urge you rescind the licences already issued and reject any new proposals for peat mining in the interests of protecting what should matter most to all of us a healthy and livable physical environment. Sincerely, Jim Whitworth

This letter was created with the use of an online letter writing tool at wildernesscommittee.org

Joan Buss

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

24 July, 2012

Darrell Ouimet
Energy, Land, and Air
Environmental Approvals
Conservation and Water Stewardship
Manitoba Conservation

Dear Mr. Ouimet,

I am a full-time resident of Little Deer, one of several cottage developments along Highway 234, on a peninsula in the Interlake north of Hecla Island. While the existing Sunterra peat mining operation at Beaver Point is acceptable to me, I have concerns regarding proposals [1-3] to dramatically increase the extent of peat mining in my neighborhood.

Presently, Sunterra is licensed to harvest peat from an area of 236 ha [4]. The applications of Sunterra, Sun Gro, and Berger are for 5000 ha more. These companies, in addition to Toubieres-Lambert and Premier, have further plans to develop this region. According to a map provided in Sun Gro's Environmental Assessment proposal [5], the total area of interest is approximately 12000 ha, which is close to 10% of the peninsula on which they are located. My concerns regarding the impact of this development are outlined below.

1. Preserved areas

The areas proposed for harvesting of peat are in close proximity to several cottage subdivisions developed by the province of Manitoba, including Beaver Creek, Mill Creek, Pebblestone Beach, Little Deer, Leaside Beach, and Islandview. The province has set aside nearby land in the form of Beaver Creek Provincial Park, Moose Creek Wildlife Management Area, and Fisher Bay Park Reserve. Much of the development proposed is within the Peguis First Nation Community Interest Zone, and is close to traditional lands of Fisher River Cree Nation and Bloodvein First Nation. These lands have been designated as protected and/or recreational areas by the province. To permit large-scale, environmentally destructive industry adjacent to them is incompatible with their intended uses. To protect these lands, the peat mining licences under consideration should not be granted.

2. Water pollution

The precarious environmental status of Lake Winnipeg is well known. To permit industry on a scale which may further endanger it is unwise. While no adverse consequences to the lake can be attributed to the relatively small Sunterra operation at Beaver Point, it is uncertain whether the pH of, and particulate matter in, the water drained during peat harvesting will continue to be negligible if Sunterra, Sun Gro, and Berger are licensed as outlined in their applications.

Sunterra proposes to harvest peat near Deer Lake, into which water from the peatland will be drained [3]. Since Deer Lake has no natural outlet, this water will presumably be retained in the area. How will this affect the lake and the surrounding area?

Until it can be demonstrated that the proposed peat harvesting will not further endanger Lake Winnipeg and its watersheds, the licences should not be granted as proposed, due to the environmental, and indeed political, risks.

3. Loss of habitat

The proposed mine sites are located in a swath following the eastern edge of the peninsula, and will form a barrier to local flora and fauna. Mining will continue on these sites for as long as 40 years [1-3], followed by a presumably lengthy restoration period, given the slow rates of growth of trees and other plants that is typical of this region. By this time, animals will have changed their territorial and migration patterns, perhaps never to return. Trees and other plants may not survive in the surrounding areas if they are isolated and the water tables are disturbed.

How can we be sure that these companies are going to be around in 40 years to fulfil their obligations to rehabilitate the peatland? In the Environment Act proposals, there is provision made to gradually allocate funds for this purpose, but are those funds going to be generated fast enough? In the case of the Sunterra proposal [3], the funds will not be completely allocated until 2027, and a similar schedule has been proposed by Berger [6]. No mention is made of whether they will be held in a segregated fund which cannot be depleted in the case of bankruptcy. If the funds for restoration of the site are not provided at the start of the development, the licences should not be granted.

The Environment Act proposals [3, 5] state that since the leased lands are owned by the crown, it is the government who must specify how they are to be restored. However, the proposals do not indicate a plan. What is the plan, and how do the applicants know they have allocated sufficient funds to complete it? If there is no feasible outline of how the land is to be restored, or criteria to assess the success of the effort, these licences should not be granted.

4. Traffic and road conditions

All traffic in and out of the area must use Highway 234. While it may be argued that the road is maintained sufficiently for the existing traffic flow, it is unlikely to withstand the increase in truck traffic necessitated by the harvesting programs outlined in the Environment Act proposals by Sunterra [3], Sun Gro [5], and Berger. Sunterra proposes to increase truck traffic from 10 return trips per day in 2013 to 17 trips per day in 2041, Sun Gro proposes to increase truck traffic from 1 truck per day in 2014 to 32 trucks per day in 2042, and Berger proposes to

increase truck traffic from 3 trucks per day in 2013 to 20 trucks per day in 2022 [6]. It is important to note that both the Sunterra and Berger propose mine sites north of the existing Sunterra site, where the highway narrows considerably and is in poorer condition. An independent, qualified engineer should be consulted to assess the condition of Highway 234 at the present time, and to certify that it can withstand the increase in traffic associated with the proposed peat mining operations.

Concern regarding the road condition has been expressed at every stage of the public consultation process, and no agreement to improve road conditions has been made. Concern regarding fugitive dust has also been expressed, to no effect. Presumably, road improvements are not being made due to their costs. If the revenue from royalties does not cover the cost of the road improvements it necessitates, perhaps the economic viability of allowing mining in the region should be questioned. If Conservation cannot reach an agreement with Manitoba Infrastructure and Transportation to improve the condition of Highway 234 to accommodate the increased traffic, these licences should not be approved.

Costs *versus* benefits

Certainly, the allocation of a small area to industry may be expected to have an overall benefit to the region. However, the proposals under consideration add up to 50 square kilometers, all contained within a small peninsula. At what point do the environmental and other adverse effects outweigh the economic benefits? How much destructive development can this area withstand?

Manitoba may be expected to benefit from the participation in the economy by the employees of the peat mines, and the government will receive income taxes from them. However, it must be noted that these employees are necessarily seasonal due to the nature of the work, and will therefore draw Employment Insurance for half the year. Do these small economic benefits justify the long-term, and potentially permanent, destruction of such a large percentage of the region? Do they justify the loss of credibility of the government on environmental issues? This decision must be considered in the context of the Save Lake Winnipeg Act, the current moratorium on peat mining, and public outrage over the application for a peat mining licence within Hecla Provincial Park [7].

Please add my name to the list of those opposed to the new peat mines proposed by Sunterra [3], Sun Gro [1], and Berger [2], as well as that proposed by Sun Gro within Hecla/Grindstone Provincial Park [7]. Instead of granting these licences, the government should reclaim these lands, and compensate the peat mining companies for any costs they have incurred in holding the leases.

References

- [1] Licence 2694 (appealed)
- [2] Licence 2969 (appealed)
- [3] Environmental Act Proposal 4254.10 (under review)

[4] Licence 2288R

[5] Environment Act Proposal 10-0293-01

[6] Environment Act Proposal 10-1054-01

[7] Licence 5548

Sincerely,

Joan Buss

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of joel peters [REDACTED]
Sent: July-22-12 8:23 PM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

I do not want this Peat Rush to continue!!

Thanks for your time!

This letter was created with the use of an online letter writing tool at
wildernesscommittee.org

Dagdick, Elise (CWS)

From: John Leach [REDACTED]
Sent: July-21-12 11:00 AM
To: Ouimet, Darrell (CON)
Subject: Peat mining

Good Morning Darrell

The corporate mentality has brought us global warming(after this summer,not much doubt),massive oil spills,tar sand waste water and a dying ocean. We have to learn to live within mother nature's bounds,or we'll pay the cost,and certainly our children will.The Manitoba government has made responsible decisions about our environment and Lake Winnipeg,to protect the complex ecology.Now it's poised to throw all of that away,just to please a corporate interest.Once the peat is gone,so will Sunterra and Sun Gro, and any jobs or economic benefit.The Manitoba water system, the atmosphere(methane)and Manitobans will bear the true cost.

Sincerely John Leach

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of John Reinfort [REDACTED]
Sent: July-21-12 10:24 AM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

Lake Winnipeg is the most endangered great lake in Canada, struggling with disconcerting water quality issues. Peat bogs are a natural water filtration solution that improves the health of the lake. The recently enacted "Save Lake Winnipeg Act" banned further peat quarry permits. We should not allow these projects—located only a few hundred metres from the shores of Lake Winnipeg—to proceed.

Undisturbed boreal peat bogs store a vast amount of carbon, and the preservation of boreal peatlands is recognized as a globally important mechanism to mitigate climate change. It is not in the public interest to remove this essential planet protection tool.

Peatlands take centuries to form, and as such, are not considered a renewable resource. It is currently not possible to restore peat bogs to their original state after mining ends.

Allowing these mines will permanently alter the ecology of the area.

The lowland areas where peatbogs are found are important habitat for many rare and unique species, and are especially important for moose. Moose populations are declining and suffering due to a variety of causes, so additional moose habitat should not be disturbed.

Peat is mined for horticultural and garden use. In a vast majority of applications, peat can be substituted with another soil additive instead.

Peat is not an essential product, like most metals that are mined.

The peat industry only employs a small number of people in Manitoba, with very modest royalties and taxes collected for the peat by the Manitoba government. The long-term damage to our environment will be more costly than the short-term economic gain.

Sunterra's proposal #4254.1

Sun Gro's proposal #5548

Sun Gro's already issued license #2964

Berger's already issued license #2969

Jiffy Canada's already issued license #2941

This letter was created with the use of an online letter writing tool at wildernesscommittee.org

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of Jonas Cornelsen [REDACTED]
Sent: July-21-12 6:38 PM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

Dear Minister,

I am writing to you as a concerned Manitoba citizen, taking issue with the proposed new peat mine licenses surrounding Lake Winnipeg. I believe the environmental cost of these mines is not worth whatever benefits they may bring. The proposals I am referring to are:

Sunterra's proposal #4254.1

Sun Gro's proposal #5548

Sun Gro's already issued license #2964

Berger's already issued license #2969

Jiffy Canada's already issued license #2941

Below, I am including a list of points to consider from the Manitoba Field Office of the Wilderness Committee (<http://wildernesscommittee.org/manitoba/>):

Lake Winnipeg is the most endangered great lake in Canada, struggling with disconcerting water quality issues. Peat bogs are a natural water filtration solution that improves the health of the lake. The recently enacted "Save Lake Winnipeg Act" banned further peat quarry permits. We should not allow these projects—located only a few hundred metres from the shores of Lake Winnipeg—to proceed.

Undisturbed boreal peat bogs store a vast amount of carbon, and the preservation of boreal peatlands is recognized as a globally important mechanism to mitigate climate change. It is not in the public interest to remove this essential planet protection tool.

Peatlands take centuries to form, and as such, are not considered a renewable resource. It is currently not possible to restore peat bogs to their original state after mining ends. Allowing these mines will permanently alter the ecology of the area.

The lowland areas where peatbogs are found are important habitat for many rare and unique species, and are especially important for moose. Moose populations are declining and suffering due to a variety of causes, so additional moose habitat should not be disturbed.

Peat is mined for horticultural and garden use. In a vast majority of applications, peat can be substituted with another soil additive instead. Peat is not an essential product, like most metals that are mined.

The peat industry only employs a small number of people in Manitoba, with very modest royalties and taxes collected for the peat by the Manitoba government. The long-term damage to our environment will be more costly than the short-term economic gain.

Thank-you,
Jonas Cornelsen

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of Joe Foy [REDACTED]
Sent: July-24-12 6:28 PM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

Regarding:

Sunterra's peat mine proposal #4254.1

Sun Gro's peat mine proposal #5548

Sun Gro's already issued peat mine license #2964

Berger's already issued peat mine license #2969

Jiffy Canada's already issued peat mine license #2941

I was shocked and saddened to learn that Manitoba still allows - even encourages - the outdated practice of peat mining.

There is nothing that peat provides that cannot be substituted with another product that does less environmental damage than peat. Mining peat damages the ecology and worsens global warming. Peat mining provides few jobs, and generates only modest revenues for the Manitoba Government.

As someone who loves Canada, and wants to see only best practices used - please register my opinion that Manitoba needs to ban peat mining province-wide.

Sincerely,

Joe Foy
[REDACTED]

This letter was created with the use of an online letter writing tool at wildernesscommittee.org

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of Judith Horner [REDACTED]
Sent: July-22-12 2:12 PM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

Dear Minister for Conservation and Water Stewardship;

Regarding the following new peat mines:

Sunterra's proposal #4254.1
Sun Gro's proposal #5548
Sun Gro's already issued license #2964
Berger's already issued license #2969
Jiffy Canada's already issued license #2941

Lake Winnipeg is the most endangered great lake in Canada, struggling with disconcerting water quality issues. Peat bogs are a natural water filtration solution that improves the health of the lake.

The lowland areas where peatbogs are found are important habitat for many rare and unique species.

The peat industry only employs a small number of people in Manitoba, with very modest royalties and taxes collected for the peat by the Manitoba government. The long-term damage to our environment will be more costly than the short-term economic gain.

Peatlands take centuries to form, and as such, are not considered a renewable resource. It is currently not possible to restore peat bogs to their original state after mining ends. Allowing these mines will permanently alter the ecology of the area.

Please do not allow these projects--located only a few hundred metres from the shores of Lake Winnipeg--to proceed.

Yours truly,
Judith Horner

This letter was created with the use of an online letter writing tool at wildernesscommittee.org

D agdick, Elise (CWS)

From: judy croy [REDACTED]
Sent: July-23-12 10:15 AM
To: Ouimet, Darrell (CON)
Subject: Peat Mining

Hello...as long-time residents of Grindstone Provincial Park who love beautiful Lake Winnipeg, we respectively encourage your Government to put environmental issues as a priority ahead of economics. Governments have the power to override any historical contracts and the responsibility to do so as new information informs us of the potential negative impacts on the lake and, ultimately, on our lifestyles. Please act responsibly on behalf of all Manitobans. Signed Calvin and Judy Croy

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of Roslyn & Barry Silversides
Sent: July-21-12 12:48 PM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

We have a cottage in Gimli and have been going there since we were children, had our children and now our granddaughter is carrying on the tradition. We are very concerned about the health of our Lake Winnipeg. These new proposed peat mines by Sunterra and Sun Gro are only going to further damage the health of the lake and all who depend on it, people, fish and wildlife. In travelling west in Canada we are amazed how much of the western waterways drain into Lake Winnipeg and how much it all can harm our lake. We need to support the natural ways which increase and support the health of our lake as well as other measures to stop the pollution. Peat moss is not in any way an essential product and it's mining will damage for years if not centuries the health of our, meaning Manitoba's and Canada's, lake. We plead with you to put nature's beautiful lake health ahead of corporations profit.
Roslyn and Barry Silversides

This letter was created with the use of an online letter writing tool at wildernesscommittee.org

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of Samantha Braun Msc.
Sent: July-20-12 10:54 PM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

Dear Minister,

"Save Lake Winnipeg Act" banned further peat quarry permits for good reason. The onslaught of proposals sent in "under the radar" are not only ecologically irresponsible, but ethically sickening (Sun Gro's already issued license #2964, Berger's already issued license #2969, Jiffy Canada's already issued license #2941, Sunterra's proposal #4254.1, Sun Gro's proposal #5548). The peat lands and supported forest store vast quantities of carbon that do not need to be added to the existing greenhouse gas mess! It's also fairly basic ecology, that these wetlands filter and bind an almost limitless amount of "junk" for lack of a better term, that would further sacrifice the water quality of Lake Winnipeg, should the last of the existing filtering systems be obliterated.

My kids would like to swim in Lake Winnipeg when they're teenagers (without repeated algal blooms) (they're 5 and 8 now)... so would their future kids, I'm sure... And it might seem a bit extreme, but the idea of catching and eating a fish or two out of Lake Winnipeg with future grandkids doesn't seem too much to ask from our policy makers either.

I actually earn my income from designing gardens and working with the public (i.e. the horticultural industry); teaching soil amendment and ecological principles to my clients as part of the process. Peat moss is not a necessity in most situations, just a well marketed, miss-informed bad habit more than anything. Repeated amendment by top dressing with mulch is a far better ecologically self-sustaining strategy for most gardeners. The mines themselves, with some seasonal machine operators, one or two packaging and shipping jobs, pale in comparison to the jobs and environmental benefits retained by leaving Lake Winnipeg the little dignity it has left. Jobs held by many first nations people, some of the most economically vulnerable citizens of Manitoba.

Please consider the first nation's 7 generation concept when making and following policy... we all have 7 generations to care for... Please follow the "Save Lake Winnipeg Act" in good faith--despite the bad-faith-rush-to-approve-before-the-bill-gets-passed garbage that's going on now. I am completely sickened with our federal government's environmental policy (or complete obliteration thereof), but I would like to know that our provincial policy makers are still a safety net for the best, long term interests of Manitobans.

Thank you for taking the time to read my concerns,

I send blessings, and faith in good judgement, Sam

This letter was created with the use of an online letter writing tool at wildernesscommittee.org

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of Shannon Larkins [REDACTED]
Sent: July-24-12 8:43 PM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

I am writing this letter to urge my government to halt any and all new peat mines in Manitoba, specifically, the following:

Sunterra's proposal #4254.1

Sun Gro's proposal #5548

Sun Gro's already issued license #2964

Berger's already issued license #2969

Jiffy Canada's already issued license #2941

Peat bogs are natural filtration systems for our already suffering lakes. As well, they store vast amounts of carbon and this has been recognised as a factor in mitigating climate change.

Please, do not let these companies find loop holes in the "Save Lake Winnipeg Act".

Sincerely,
Shannon Larkins

[REDACTED]

This letter was created with the use of an online letter writing tool at wildernesscommittee.org

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of Stephen Berg [REDACTED]
Sent: July-23-12 9:59 AM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

To whom it may concern:

I am writing in regards to the proposals to mine peat in the Interlake region. This is a terrible idea which will only accelerate the demise of Lake Winnipeg, not to mention will destroy the provincial parks within which the proposals are planned and will accelerate global warming.

Lake Winnipeg is the most endangered great lake in Canada, struggling with disconcerting water quality issues. Peat bogs are a natural water filtration solution that improves the health of the lake. The recently enacted "Save Lake Winnipeg Act" banned further peat quarry permits. We should not allow any of these projects (#4254.1, #5548, #2964, #2969, and #2941) – located only a few hundred metres from the shores of Lake Winnipeg – to proceed.

Undisturbed boreal peat bogs store a vast amount of carbon, and the preservation of boreal peatlands is recognized as a globally important mechanism to mitigate climate change. It is not in the public interest to remove this essential planet protection tool.

Peatlands take centuries to form, and as such, are not considered a renewable resource. It is currently not possible to restore peat bogs to their original state after mining ends, despite what the mining companies (Sunterra, Sun Gro, Berger, and Jiffy Canada) have stated. Allowing these mines will permanently alter the ecology of the area.

The lowland areas where peatbogs are found are important habitat for many rare and unique species, and are especially important for moose. Moose populations are declining and suffering due to a variety of causes, so additional moose habitat should not be disturbed.

Peat is mined for horticultural and garden use. In a vast majority of applications, peat can be substituted with another soil additive instead. Peat is not an essential product, like most metals that are mined.

The peat industry only employs a small number of people in Manitoba, with very modest royalties and taxes collected for the peat by the Manitoba government. The long-term damage to our environment will be more costly than the short-term economic gain.

Please ensure these peat mining proposals do not go ahead.

Thank you for your attention.

This letter was created with the use of an online letter writing tool at wildernesscommittee.org

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of steven carpenter [REDACTED]
Sent: July-21-12 9:37 AM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

Stop the Manitoba peat mines. The reference numbers for the new peat mines are:

Sunterra's proposal #4254.1

Sun Gro's proposal #5548

Sun Gro's already issued license #2964

Berger's already issued license #2969

Jiffy Canada's already issued license #2941

Lake Winnipeg is the most endangered great lake in Canada, struggling with disconcerting water quality issues. Peat bogs are a natural water filtration solution that improves the health of the lake. The recently enacted "Save Lake Winnipeg Act" banned further peat quarry permits. We should not allow these projects—located only a few hundred metres from the shores of Lake Winnipeg—to proceed.

Undisturbed boreal peat bogs store a vast amount of carbon, and the preservation of boreal peatlands is recognized as a globally important mechanism to mitigate climate change. It is not in the public interest to remove this essential planet protection tool.

Peatlands take centuries to form, and as such, are not considered a renewable resource. It is currently not possible to restore peat bogs to their original state after mining ends. Allowing these mines will permanently alter the ecology of the area. The lowland areas where peatbogs are found are important habitat for many rare and unique species, and are especially important for moose. Moose populations are declining and suffering due to a variety of causes, so additional moose habitat should not be disturbed.

Peat is mined for horticultural and garden use. In a vast majority of applications, peat can be substituted with another soil additive instead. Peat is not an essential product, like most metals that are mined.

The peat industry only employs a small number of people in Manitoba, with very modest royalties and taxes collected for the peat by the Manitoba government. The long-term damage to the environment will be more costly than the short-term economic gain.

This letter was created with the use of an online letter writing tool at wildernesscommittee.org

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of Sue Fox [REDACTED]
Sent: July-24-12 7:13 PM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

Please banned Peat Mining in all of Manitoba!!! NOW!!!

This letter was created with the use of an online letter writing tool at
wildernesscommittee.org

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of t.bell [REDACTED]
Sent: July-23-12 8:36 AM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

This letter regards new peat mines #4254.1, #5548, #2964, #2969, and #2941.

With our lakes becoming more and more toxic from our agriculture and sewage industries why is the mining of peat, which is a much needed filtration system to keep water healthy, being allowed to go ahead?

with our future ability to have a clean and viable earth becoming less and less likely actions such as yours to allow any further mining of peat at this time is unconscionable.

Furthermore this knowledge is known to many hence the "Save Lake Winnipeg Act" has banned further peat mining permits.

i suggest that your section of government start to represent the people of the earth.

This letter was created with the use of an online letter writing tool at wildernesscommittee.org

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of T. Furmaniuk [REDACTED]
Sent: July-21-12 10:52 PM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

Dear Minister for Conservation and Water Stewardship:

- Lake Winnipeg is the most endangered great lake in Canada, struggling with disconcerting water quality issues. Peat bogs are a natural water filtration solution that improves the health of the lake. The recently enacted "Save Lake Winnipeg Act" banned further peat quarry permits. We should not allow these projects—located only a few hundred metres from the shores of Lake Winnipeg—to proceed.

- Undisturbed boreal peat bogs store a vast amount of carbon, and the preservation of boreal peatlands is recognized as a globally important mechanism to mitigate climate change. It is not in the public interest to remove this essential planet protection tool.

- Peatlands take centuries to form, and as such, are not considered a renewable resource. It is currently not possible to restore peat bogs to their original state after mining ends. Allowing these mines will permanently alter the ecology of the area.

- The lowland areas where peatbogs are found are important habitat for many rare and unique species, and are especially important for moose. Moose populations are declining and suffering due to a variety of causes, so additional moose habitat should not be disturbed.

- Peat is mined for horticultural and garden use. In a vast majority of applications, peat can be substituted with another soil additive instead.

Peat is not an essential product, like most metals that are mined.

- The peat industry only employs a small number of people in Manitoba, with very modest royalties and taxes collected for the peat by the Manitoba government. The long-term damage to our environment will be more costly than the short-term economic gain.

With reference to peat mine proposals and licence numbers: 4254.1, 5548, 2964, 2969, and 2941, we urge you to ensure that licenses are not issued, and to rescind already issued licences, in this group in order to protect the peatlands and the areas around them, and to uphold the "Save Lake Winnipeg Act".

- T. Furmaniuk

This letter was created with the use of an online letter writing tool at wildernesscommittee.org

Dagdick, Elise (CWS)

From: webmaster@wildernesscommittee.org on behalf of Tim Yusishen [REDACTED]
Sent: July-20-12 4:01 PM
To: Ouimet, Darrell (CON)
Subject: Stop the Manitoba "Peat Rush"

Dear Minister of MB Conservation,

Peat bogs are the lands natural filter as nature designed.
Renewable Hemp should be used as the new standard where ever possible.

Thank you,

Tim Yusishen, President / CEO
[REDACTED]
[REDACTED]
[REDACTED]

This letter was created with the use of an online letter writing tool at
wildernesscommittee.org

July 23, 2012

Mr. Darrell Ouimet
Manitoba Conservation
Environmental Assessment & Licensing Branch
123 Main St Suite 160
Winnipeg, MB R3C 1A5

**Re: File Number 4254.10
Sunterra Horticulture (Canada) Inc. Peat Mine Development**

Dear Mr. Ouimet,

I am writing to express opposition to the Sunterra Horticulture (Canada) Inc. Peat Mine Development proposal on the grounds that it will have significant negative environmental impact. According to the mission of the Environmental Assessment and Licensing Branch - **"The Environmental Assessment & Licensing Branch will ensure that developments are regulated in a manner that protects the environment and public health, and sustains a high quality of life for present and future Manitobans"** - this development cannot be regulated in a way that protects the environment.

By including a section in the Save Lake Winnipeg Act which places a 2 year moratorium on any new leases for peat mining in Manitoba, the province of Manitoba has acknowledged the fact that peat mining is damaging to water quality. Any possible filtering effects from the peat would be lost and there would be more sediment running off during heavy rain events.

The peat mine operation would add further burden of nutrients to the water at a time when Premier Selinger announced that the provincial government had set a goal of a reduction of 50% of nutrients getting into Lake Winnipeg.

A recent report by ICF Marbek for Environment Canada assesses the cost effectiveness of different strategies for **reducing nutrient discharges** to Lake Winnipeg (cost per tonne of phosphorus removed). This confirms previous Environment Canada conclusions (Wilson 2009) for water regulation, where wetlands and water filtration by forests provided the best cost-effectiveness, better than man-made management systems.



The satellite image above, from July 17 2012, shows a significant blue-green algae bloom in and around the narrows of Lake Winnipeg. Allowing further peat mining operations in this area can only exacerbate this problem.

Beyond the significant water quality concerns to an already severely stressed lake, this peat mine would contribute substantial amounts of carbon emissions to Manitoba's cumulative greenhouse gas emissions. The provincial government legislated a goal of reducing Manitoba's greenhouse gas emissions to 6% below our 1990 emission levels. However instead of moving towards that goal we have done the opposite. Overall, Manitoba's GHG emissions **increased 10% from 1990 to 2009**. Also, in 2009 our emissions were **16% above** the level we need to be at by 2012 to achieve our **Kyoto Protocol** target. Allowing new peat mines to operate would go against our legislated goal of reducing emissions.

I am opposed to the issuing of a permit to Sunterra Horticulture (Canada) Inc. to expand their peat mining operations and instead encourage government to support research and development into alternative, sustainable products.

Yours truly,



Vicki Burns

The Lake Winnipeg Project

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

<http://canadawater.wordpress.com>

Dagdick, Elise (CWS)

From: Vince and wendy Kennedy [REDACTED]
Sent: July-22-12 1:45 PM
To: Ouimet, Darrell (CON)
Subject: Peat Mining

Mr Ouimet-

Having considered the question on whether or not the province should permit any further licensing of peat mines, having read the materials on both sides of the question and having done map and image reconnaissance of the areas north of Riverton, I urge the government NOT to allow any further expansion or extension of the peat mining.

It is simply disingenuous to suggest that draining and then stripping out peat from natural bogs along the proximity of the drainage area of Lake Winnipeg will not have some direct and negative effect on the ecological balance in the mini-systems of the bogs. And for what - the companies engaged in the sale of peat say its for business - but in reality it is for a cheap fertilizer for urban flower beds and plantings. There is no rational balance in the argument.

Stop the peat mining.

Vince Kennedy
Winnipeg, MB


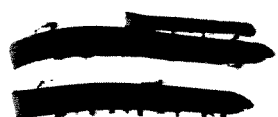
Mr. Darrell Quimet
Environmental Approvals Branch
Conservation and Water Stewardship
123 Main Street, Suite 100
Winnipeg, MB
R1C 1A5

RE: Opposition to Sinteria Horticulture, Post Mine Development
Case #254 10

Dear Sir:

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

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

Printed Name	Address	Signature
<i>Don Schlichting</i>		<i>Don Schlichting</i>
ROBERT SHAW		<i>Robert Shaw</i>

darrell.ouimet@gov.mb.ca

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
Garv Store	[Redacted]	[Signature]
Brian Unge	[Redacted]	[Signature]
Dustin Liebrecht	[Redacted]	[Signature]
Everett Medema	[Redacted]	[Signature]
Bill Ward	[Redacted]	[Signature]
Natasha Sedermay	[Redacted]	[Signature]
C. [Redacted]	[Redacted]	[Signature]

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
BILL MARTIN	[REDACTED]	[Signature]
TOM BOUGHEN	[REDACTED]	[Signature]
Sharon Mudder	[REDACTED]	[Signature]
Kent Knapp	[REDACTED]	[Signature]
[Signature]	[REDACTED]	[Signature]
C. GADWYER	[REDACTED]	[Signature]
Norm White	[REDACTED]	[Signature]
Wendy Church	[REDACTED]	[Signature]
NORMAN LEBLANC	[REDACTED]	[Signature]
MARGARET LEBLANC	[REDACTED]	[Signature]

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
DARRYL HILDEBRAND	[REDACTED]	[Signature]
Kelly Hildebrand	[REDACTED]	[Signature]
Jon Benoit	[REDACTED]	[Signature]
Carrie Frobisher	[REDACTED]	[Signature]
Phil Desorey	[REDACTED]	[Signature]
Sherry Desorey	[REDACTED]	[Signature]
Ray Desorey	[REDACTED]	[Signature]
Genny Desorey	[REDACTED]	[Signature]
Carly Frobisher	[REDACTED]	[Signature]
Sheldon Henkel	[REDACTED]	[Signature]
PHIL BENOIT	[REDACTED]	[Signature]