



**Conservation and Water Stewardship**

Climate Change and Environmental Protection Division  
Environmental Approvals Branch  
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**File: 4254.10**

June 24, 2013

Shaun Moffat  
KGS Group  
3<sup>rd</sup> Floor – 865 Waverley St.  
Winnipeg, MB R3T 5P4

Dear Mr. Moffat:

**Re: Sunterra Horticulture (Canada) Inc. – Sunterra Peat Mine Development**

Further to my June 5, 2013 information request for the above noted project, below are the specific comments from the public and the Technical Advisory Committee (TAC) that need to be addressed in your response.

**1. Please provide a response to the following comments from the public (the original comments will provide context):**

- a. The proposed access road is too close to the neighbouring cottage development;
- b. The development would result in a loss of flood storage for the local area;
- c. The Mill Creek Cottage Development was not listed as a stakeholder in the proposal;
- d. Clearly identify the drainage route and rate of flow from the Ramsey Point Bog, particularly for any drainage through the Pebblestone Beach Cottage Development;
- e. The proposal identifies forestry, hunting, trapping, and particularly fishing in Lake Winnipeg as important economic activities in the area. Cottage development and operation are excluded as an economic contributor. Cottage communities are a significant economic contributor for the area and should be included in the economic analysis;
- f. The statement in the proposal that there is an abundance of peat in Manitoba does not account for the varying types of peat deposits within Manitoba. Muskeg tends to be located in northern regions and peat bogs in the southern regions, where existing access makes them more vulnerable to development;
- g. While bogs and fens may be quite common in Manitoba and Canada, bogs such as these three bogs are not common;
- h. The assessment report does not address or explain how the hydrological, ecological, and carbon storage functions of the peatlands will be restored; and
- i. Provide examples of the effectiveness of restoration of peat in similar environments.

**2. Please provide responses to the following, referring to the June 25, 2012 comments from the Water Quality Management Section for context:**

- a. Provide a summary of the water quality monitoring data from the sampling required in Environment Act Licence No. 2288 R for the Beaver Point Bog peat mine development from 1997 to the present, and describe how it supports the environment assessment report conclusion that the proposed project is not likely to have adverse effects on downstream surface waters.
- b. The report indicates that the proposed settling ponds are expected to have a residence time of two hours. Provide background information to support the effectiveness of settling ponds to achieve surface water quality objectives and guidelines in the water discharged from the ponds for nutrients, pH, and metals given the proposed residence time.
- c. Provide performance and design criteria for the potential mitigation of pH through the use of a limestone lined ditch.

**3. Please provide a response to the following, referring to the July 27, 2012 comments from the Lands Branch and the Sustainable Resource and Policy Management Branch for context:**

- Provide details and examples in regards to the claim that restoration of a site often results in a wider diversity of flora, which results in a wider variety of habitats to support more diverse fauna.

**4. Please provide a response to the following, referring to the July 3, 2012 comments from the Wildlife Branch for context:**

- The environmental assessment indicates that wildlife surveys were conducted between September 2010 and October 2011, with site visits occurring in September, May and June. Provide more specific information regarding the exact days that site visits occurred.

If you have any questions, please contact me at [elise.dagdick@gov.mb.ca](mailto:elise.dagdick@gov.mb.ca) or 204-619-0709.

Yours truly,



Elise Dagdick, B.Sc.  
Environmental Approvals Branch

c: Public Registries