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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 a trained 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. 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?

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? What I, and the over 200 signatories of the attached petition are asking is for the government to respect the spirit of the law and ban all new peat mines regardless of when the leases were granted, including expansions like the one proposed by Sunterra, before we lose the a vital filter in the fight to save Lake Winnipeg and a priceless carbon storehouse that is offsetting the seemingly unchecked rise in ${\rm CO}_2$ in our atmosphere.

Bogs and fens can hold vast amounts of water (up to 20 times the weight of the *Sphagnum*) and those with outlets into the watershed play a critical role in 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 CO_2 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 one 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 processers 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,

Heather Hinam, Ph.D.

Auther Honard

cc. Hon. Peter Bjornsson, MLA

cc. Hon. Greg Selinger, Premier

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