

March 31, 2015

Re: Black Point Quarry Environmental Assessments Registration

The Black Point Quarry project in Guysborough County will alter a large area of wetland. A direct impact of 17.5 hectares is predicted based on infilling and drainage during construction with potentially another 15 hectares or so indirectly impacted due to changes in groundwater flow, sedimentation and runoff.

If this project proceeds as indicated in the registration documents, it would result in a significant loss of high functioning wetlands for Nova Scotia. It is recommended that wetlands be avoided whenever possible. However, if wetlands cannot be avoided compensation will be required through a wetlands alteration approval consistent with the Nova Scotia Wetland Conservation Policy.

The proponent does not discuss details for compensation for wetland losses, but should be aware that the likely minimum cost for compensation is going to be between \$1.4 and \$1.6 million to do restoration at a 2:1 ratio. Due to the scale of wetland impacts, and likelihood of few suitable restoration opportunities in the area, restoration work will have to be completed far away from the project site, and compensation may need to consider a range of options to meet approval requirements. Due to the complexity of identifying suitable compensation, it is recommended that the compensation plan details be worked out with NSE well in advance of any wetland alteration application.

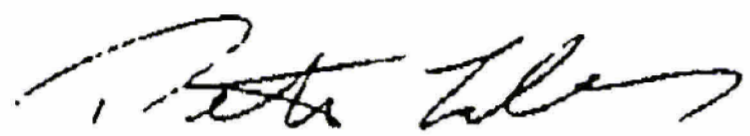
Wetlands are a dominant ecosystem type in the project and surrounding area and there are a variety of high functioning wetland types that will be lost. Along with that loss will be the loss of valuable, relatively undisturbed wildlife habitat, possibly including habitat for species of conservation concern. It is recommended that the proponent specifically document work to identify the presence/absence of listed species at risk within these wetland habitats, (e.g. Rusty Blackbird, Frosted Glass Whisker Lichen). If species at risk are present in wetlands, these wetlands may be determined to be wetlands of special significance, thereby limiting the Department in approving alteration under the 2011 Nova Scotia Wetland Conservation Policy.

Remaining sections of wetlands that have been partially altered should be required to have a monitoring plan in place so indirect impacts can be accurately quantified and appropriate compensation applied. Monitoring should be required at all wetlands that are adjacent to the developed areas not planned to be altered directly by the quarry, so that indirect impacts can be accurately quantified and appropriate compensation applied.

The proponent should also be required to provide excellent cross-drainage (not a single culvert) under roads through wetlands so that hydrologic linkages on both sides of the road are maintained.

The proponent should be required to provide GIS shape files and metadata on all wetlands that were delineated for this project and wetlands as part of the compensation to Frances MacKinnon from NSDNR-Wildlife Division in Kentville and the Wetland Specialist from NSE in Halifax so that the wetland inventory can be updated with this information.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Labor". The signature is fluid and cursive, with a long horizontal stroke at the end.

Peter Labor
Director, Protected Areas & Ecosystems