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Date: 12 April 2019

Environmental Assessment Branch

Saskatchewan Ministry of Environment
Government of Saskatchewan

To whom it may concern,

Re: CanPacific Potash Mine (Project Albany 2017-010)

We write in respect of CanPacific Potash Inc's proposed development of a 3.25 million tonne-per-year potash mine, known as Project Albany, located near the Town of Francis and Village of Sedley in the rural municipalities of Francis No. 127 and Lajord No. 128.

The Canadian Parks and Wilderness Society (Saskatchewan Chapter) raises concerns that in its current location this proposal has the potential to impact critically important habitat. Native grasslands are among the most endangered ecosystems on the planet and here in Saskatchewan there has been a steady if not rapid decline of this increasingly rare grassland, seeing nearly 90 percent lost to the cumulative effects of development and the broader cultivation of land. With only fragments of this habitat remaining across the prairies of Saskatchewan it is imperative that we do all that we can and that is necessary to cease any further degradation, loss and fragmentation of this critical habitat. We encourage the Government of Saskatchewan to ensure that major mining operations, like Project Albany, are subject to similar guidelines, in place for other sectors, that ensure projects happen away from important habitat.

Environmental Impact Assessment (EIA) and Baseline Habitat Study

CPAWS-SK welcomes the details submitted as part of this EIA, along with the informative Baseline Wildlife and Wildlife Habitat Study (SNC Lavalin, 2018) and its Addendum. This habitat study identifies numerous key species, notably Species at Risk (SAR) and Species of Conservation Concern (SOCC), within the regional and plant site study area, highlighting the vital role this critical ecosystem is providing to the many species that rely on these rich mosaics of wetland, riparian and grassland habitats.

We understand from table 10.2 *Land Use Mapping Results* that the study area represents 8.9% pastureland/grassland (4,394ha). Whilst it is noted that the proposed plant site does not result in the direct loss of pastureland/grassland habitat, it should not be considered as a mitigating factor to the threat the proposal still has on the functional aspect of the broader site, which includes important pastureland/grasslands, wetlands and riparian habitat. Therefore, further aspects of this proposal need serious consideration, namely the potential and additional direct impact of the *priority* well field and wider *20 year* and *ultimate* well fields and their associated infrastructure, which would encapsulate

most of the pastureland/grassland and additional wetland and riparian habitats. CPAWS-SK would look to ensure this important and fragile ecosystem is not subject to any further degradation, loss or fragmentation as a result of this proposal.

Whilst the main plant site avoids the direct loss of pastureland/grassland, table 10.2 notes that 73ha of wetland and riparian habitat within or partially within the plant site boundary would be lost. The EIA further identifies this effect, in para 10.5.2.1, as “*resulting in loss of all plant and wildlife habitat as well as hydrological function*”. Whilst wetlands only represent 2% of the study area (1,002ha), we remain concerned about the impact this loss could still have on existing wetland wildlife, pastureland/grassland habitat, the broader and connected ecosystem, and the many important species identified in the SNC-Lavalin 2018 Habitat Study.

The EIA quite rightly refers to the important attributes of wetlands, noting “*wetlands provide local benefits such as flood retention and control, water filtration, erosion prevention and a source of food and habitat for wildlife*” (EIA, page 241). Due to the direct loss and potential broader impact to wetlands and riparian habitat in the area as a result of this proposal, there may likely be significant impact on these benefits, resulting in a degradation, loss and fragmentation of important wildlife habitat, not to mention the potential wider impact to the critically important pastureland/grassland habitat.

Whilst we welcome the intention of the mitigation proposals through *avoidance, minimize and reclaim* measures, along with a proposed ‘*wetland compensation plan*’, this does not adequately remove the likelihood of degradation, loss and fragmentation of this critical habitat as a result of this proposal. Therefore, the direct loss of wetland and riparian habitat and likely degradation, loss and fragmentation of pastureland/grassland habitat remains of critical concern to CPAWS-SK. Without a determination, assessment or identification of the location of the well pads presently, as noted in the EIA and which states the potential loss of pastureland/grassland habitat as a result, we remain additionally concerned that the current proposal does not adequately address the likelihood of further degradation, loss and fragmentation of this important ecosystem.

Conclusion

With the implications of a long-term operation at this site, it is essential that the long-term interests of pastureland/grassland, wetland and riparian habitat and their associated species, including species at risk, are a priority consideration for the Government of Saskatchewan in the decision-making process. Whilst economic development in our province is necessary, the unnecessary degradation, loss, disturbance and fragmentation of one of the most endangered ecosystems on the planet is not. We see this current proposal and its boundaries as having the potential to negatively impacting critical native grassland habitat, important wetland and riparian habitat and their key species.

Should you have any queries regarding these comments, please do not hesitate to contact us.

Yours sincerely,



Stewart Coles

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