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From: Peter Whitehead - Cape Ecology Ltd [mossbod@hotmail.com]

Sent: Sunday, July 10, 2011 5:14 PM

To: AENV Environmental Assessment

Subject: Suggested changes to Terms of Reference for Cenovus Energy Inc.'s Pelican Lake Grand Rapids Project

Attn: Director, Environmental

Assessment

Alberta Environment

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I would like to propose an amendment to the Terms of Reference document (Sections 3.6.1 A, 3.6.2 A and 3.6.2 B):

Proposed Terms of Reference for Cenovus Energy Inc.'s Pelican Lake Grand Rapids Project

The change I would like to propose eliminates ambiguity regarding searches for rare plants in environmental assessments in general. I will be proposing this amendment for all terms of reference in the future, until it is generally adopted.

Most habitats in Alberta can potentially support rare vascular plants, rare bryophytes and rare lichens included in the ACIMS tracking and watch lists and in Schedule 1 of Species of Risk Act . Peatlands and uplands in the Boreal Forest Natural Region of Alberta and particularly rich in bryophytes and lichens. In the sections quoted above, the Terms of Reference use the term "rare plants" which strictly speaking does not include rare lichens because lichens comprise a symbiotic relationship between an alga and fungi. Historically searches for rare lichens have not been adequate, possibly because of the ambiguity suggested. Although I believe things are changing for the better, I would like this potential loophole to be closed to ensure that lichens are included in environmental assessments.

Also, the term "rare plants" could be interpreted as meaning rare vascular plants. Historically rare bryophytes have not been searched for adequately when searches for rare plants are conducted. Once again I believe that this is changing for the better, but I would like rare bryophytes to be mentioned in the Terms of Reference to ensure that they are included in environmental assessments.

The amendment I propose in all the sections mentioned above, is that the term "**rare plants**" becomes "**rare vascular plants, rare bryophytes, rare lichens**". The effect of this change will be to ensure that surveys include ALL vegetation identified on the ACIMS tracking and watch lists and in Schedule 1 of Species of Risk Act . This is something that can only be of benefit to the Province.

The newly formed Alberta Bryophyte and Lichen Interest Group (www.ablig.com), is working to ensure that the interests of bryophytes and lichens are not ignored in Alberta.

If you have any questions regarding my suggested amendment please do not hesitate to contact me.

I would be grateful if you could confirm receipt of this suggested change.

Regards

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Ecologist, Bryologist

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7/11/2011

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