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Calgary Head Office
Suite 1000, 250 – 5 Street SW
Calgary, Alberta T2P 0R4
Canada

BY E-MAIL ONLY

www.aer.ca

Cal Clark, *Manager Sustainability*

Riversdale Resources

Benga Mining Ltd.

Major Deficiencies in the Environmental Impact Assessment Report

Dear Mr. Clark:

The Alberta Energy Regulator (AER) has completed its preliminary review of Benga Mining Limited's (Benga's) Grassy Mountain Coal Project environmental impact assessment (EIA) report. The AER received the EIA along with mine site and coal processing plant applications under the *Coal Conservation Act* (CCA).

The AER has determined that the EIA has major deficiencies and is not complete. For the AER to continue processing the EIA, Benga must address the items identified in the major deficiencies report attached to this letter.

Current Status of the Applications

The mine site and coal processing plant applications remain under review by the AER. A supplemental information request (SIR) may be issued to Benga upon completion of the review.

Resubmission of the EIA with a Fully Integrated Project Application

Benga may resubmit the EIA once the noted deficiencies have been addressed. The AER requests that Benga submit a fully integrated project application package along with the EIA. The fully integrated project package would include appropriate applications under the *Environmental Protection and Enhancement Act* (EPEA), *Public Lands Act* (PLA), the *Water Act*, and the CCA. To maintain alignment with the federal regulatory process, this should be submitted along with the federal EIS responses.

Statements of Concern (SOC) and Letters of Support (LOS)

There are 29 SOC's and 24 LOS's filed on the applications. The SOC's and LOS's will be considered as part of the decision on the current applications. The AER will post, for public notice, any and all additional project applications under *EPEA*, the *Water Act*, the *PLA*, and the *CCA* once received.

AER's Communication Plan

The AER will inform filers of SOC's and LOS's that the AER has issued a major deficiency report to Benga and Benga may resubmit the EIA once the deficiencies have been addressed. The decision will be posted on the AER's website at www.aer.ca. It will also be posted by the Environmental Assessment Registrar at <http://esrd.alberta.ca/lands-forests/land-industrial/programs-and-services/environmental-assessment/default.aspx>

Regards,

Amit Banerjee
Director, Surface Authorizations

Enclosure (1): Major deficiencies report

cc: Cal Clark, Benga Mining Ltd.
Rushang Joshi, AER
Renee Marx, AER
Deanna Colley, AER
Julia Fulford, AER
Brett Maracle, CEAA
Melanie Danyluk

SME Area	TOR Section Details and/or Comments	Issue	Details
EIA Methodology	2 Scope of the EIA Report and Guide to Preparing Environmental Impact Assessment Reports in Alberta (GoA 2013)	Overall evaluation of significance	<p>The EIA methodology outlined in Volume 1, Section D.2.5.3 (specifically Page D-18) was not used in assessing the final impact rating. The definition of significance as per Table D.2.5-2 was also not used consistently across consultant reports e.g. the evaluation of significance as “insignificant” or “significant” was used for most disciplines, while several disciplines added modifiers such as “moderate” or “minor” and no clarifying definitions were provided.</p> <p>In addition, as required in the Guide to Preparing Environmental Impact Assessment Reports in Alberta (GoA 2013) Section 2.3.2 and 2.3.3, the evaluation of significance lacks a clear rationale to support the conclusions and as such, lacks transparency of process or the ability of a stakeholder or reviewer to follow the assessment logic from baseline data through to final impact rating.</p>
Conservation & Reclamation	3.2.8 Conservation and Reclamation [A]: Provide a conceptual conservation and reclamation plan for the project.	Proposed conceptual mine reclamation strategy	Section 3.2.8 of the Terms of Reference (AER, 2015) requires Benga to – “Provide a conceptual conservation and reclamation plan for the project.” Understanding the existing terrestrial and hydrodynamic conditions of the baseline and conceptually how this will translate into a final reclaimed landscape, is critical in understanding the overall feasibility of the mine plan. The conservation and reclamation plan found in Volume 1 Section F does not provide sufficient detail for the review team to assess its viability. Specific issues and data gaps include:
	3.2.8 Conservation and Reclamation [A]: Provide a conceptual conservation and reclamation plan for the project. Describe and map, as applicable, (b) current land use and capability and proposed post-development land use and capability.		Adequately characterizing the current land use capability, as required in Section 4.9.2 of the Terms of Reference (AER, 2015), an inventory of the pre- and post-disturbance land capability classes for the soils in both the Project Area and the Local Study Area
	4.9.2 Terrain and Soils - Impact Assessment [A]: Describe project activities and related issues that could affect soil quality (e.g., compaction, contaminants) and (b) provide an inventory of the pre and post-disturbance land capability classes for soils in both the project area and the local study area ...		Adequately describing the proposed post development land use capability including: volumetric analysis of soil quantity and handling processes needed to achieve the final reclaimed landscape and equivalent land capability.
	3.2.8 Conservation and Reclamation [A]: Provide a conceptual conservation and reclamation plan for the project. Describe and map, as applicable, (b) current land use and capability and proposed post-development land use and capability.		The additional details are also needed of the final self-sustaining drainage characteristics needed to support final revegetation communities, changes in biodiversity, impact on wildlife habitat, and the long term viability of the end-pit lake.
	4.8.2 Biodiversity - Impact Assessment [A]: Describe the metrics used to assess the probable impacts of the project. Discuss the contribution of the project to any anticipated changes in regional biodiversity and the potential impact to local and regional ecosystems. [B]: Identify and evaluate the extent of potential effects of fragmentation on biodiversity thta may result from the project. Discuss those effects at all relevant scales (from site specific to landscape level).		Discussion of the contribution of the project to any anticipated changes in regional biodiversity and the potential impact to local and regional ecosystems is not clearly provided. The impact assessment only provides fragmentation analyses, which do not on their own provide an assessment of impacts to local and regional biodiversity.

Air Quality	<p>4.1 Air Quality, Climate and Noise 4.1.2 [A] Identify components of the project that will affect air quality and (a, b, c).</p> <p>Guide to Preparing Environmental Impact Assessment Reports in Alberta (GoA 2013) Air Quality Model Guide (GoA 2013a)</p>	Suitability of numerical model and assessment of predicted exceedances	<p>While it is recognized that the Air Quality Model Guide (GoA 2013a) prescribes the use of CALPUFF for the modelling of an EIA, the suitability of the modelling parameters are not adequately described and as such potential remodelling may be required if the settings cannot be scientifically justified. According to the Guide to Preparing Environmental Impact Assessment Reports in Alberta (Section 2.4) “Proponent must clearly demonstrate that the proposed model is applicable to the circumstance in which it will be used” and “the EIA report must clearly identify the limitations of the models including sources of error and relative accuracy”.</p> <p>Potential modelling issues include: - The terrain (TERRAD = 10) for the modelling domain may not be allowing for topographical variation of the mountainous study area. - Source elevations were modelled at the pre-disturbance height of the mountain and do not account for the final elevation being almost 100 m lower at project end. An assessment and discussion of source elevations would clarify if the model predictions were adequately conservative, assuming they are modelled at 100 m taller than during final phases of the project.</p> <p>Assessment of predicted exceedances: - The model predicts exceedances of particulate matter. No scientific explanation of these exceedances is provided other than a comment that the model is conservative. - Baseline and background data sources were used from far afield monitoring stations (Nelson and Lethbridge). Assessment and discussion is needed to understand that these stations adequately characterize the background concentrations (specifically particulate matter) used to determine cumulative effects of the project.</p>
Water Management	<p>3.2.6 Water Management [A] Describe the water supply requirements for the project, including:</p> <p>3.2.6.2 Surface Water [A] Describe the surface water management strategy for all stages of the project, including items (a) to (d). [B] Describe and map all crossings of watercourses or water bodies (including bridges, culverts and pipelines) required. [C] Describe discharges to the watershed from existing and reclaimed site, including potential end-pit lakes and the management strategy for handling such releases.</p> <p>4.2 Hydrogeology 4.3 Hydrology The information highlighted relates to the information requested in various sub-sections of these two sections.</p> <p>Water related sections above also apply to this item. In addition, 4.10.2[D](i) - Land Use and Management Impact Assessment - also applies: Identify the potential impact of the project on land uses, including (i) the potential impact on existing land uses of anticipated changes (type and extent) to the pre-disturbance topography, elevation and drainage pattern within the project area.</p>	Linkages between water and receptors	<p>Benga has compiled a regional geologic model and provided technical details in relation to surface water and groundwater and some details on surface water / groundwater interaction. However, Benga has not provided an integrated conceptual water model which would help test hypothetical linkages between surface water, groundwater and receptors as required in the Terms of Reference (AER, 2015) Section 3.2.6. Potentially deficient linkages include:</p> <ul style="list-style-type: none"> • Scientific justification has not been provided to establish the basis for the time required to fill water-containing structures including the raw water pond, saturated backfill zones, and the end pit lake, while considering instream flow needs. • The uncertainty regarding selenium concentrations and selenium attenuation effectiveness, both during operations and post closure, has not been adequately discussed. Scientific justification has not been provided to support Benga’s assumption that selenium levels are “about half” that of similar coals in the region. Available literature indicates potential selenium attenuation efficiencies by biochemical reduction would typically be in the range of 85% to 95% (CH2MHill, 2010). Benga’s assumption of a 99% reduction efficiency has not been scientifically referenced. • Karst potential beneath the open pit mine (e.g., Worthington, S.R.H. 1991. “Karst Hydrogeology of the Canadian Rocky Mountains.” Department of Geography, McMaster University. Hamilton, Ontario. May 1991. and Norris, D.K. 1993. “Geology, Blairmore, (West Half), West of Fifth Meridian, Alberta.”; Geological Survey of Canada, “A” Series Map 1831A,) • Legacy surface waste rock pile effluent quality and existing impacts to Blairmore and Gold Creeks – missing baseline data. • Legacy subsurface mine workings potential for short circuiting local groundwater transport – see comment below regarding drinking water. • Understanding of groundwater contribution to Blairmore and Gold Creek baseflow specifically during low flow conditions. Steady state calibration of the hydrogeological model and lack of baseline low flow data preclude assessment of potential impacts to baseflow during low flow events – potential impacts to aquatic life from mine dewatering. <p>The linkage between potential project effects and the Town of Blairmore’s drinking water supply has not been addressed. The Town’s water wells are located near the confluence of Blairmore Creek and the Crowsnest River. Potential linkages include short circuiting groundwater transport from old mine workings, short circuiting groundwater transport from Karst features and potential surface water/groundwater interactions of Blairmore Creek in proximity to the water wells – potential linkage to human health risk assessment.</p>
AER Socio-Economic	<p>3.2.3 Regional and Cooperative Efforts [A] Discuss the proponent’s involvement in regional and cooperative efforts to address environmental and socioeconomic issues associated with regional development.</p>	Regional and cooperative efforts to mitigate regional socio-economic issues.	<p>Provided Benga’s proximity and overlapping labour force with five TECK mines in BC, it will be interesting to see if there have been any discussion on Regional and Cooperative Efforts. Based on feedback at Kick-off, Benga has not discussed with TECK.</p>

AER Socio-Economic/ AB Transportation	<p>3.2.4 Transportation: Prepare a impact assessment as per Alberta Transportations Traffic Impact Assessment Guidelines:</p> <p>a. describe background traffic and consider the cummlative impacts of traffic due to other existintg and planned developments using the same highways and accesses;</p> <p>b. discuss anticipated changes to highway traffic (e.g. type, volume) due to the project;</p> <p>c. assess potential traffic impacts for all stages of the project (e.g. construction, operation, maintenance, expansion, and shut down); and</p> <p>d. determine any necessary improvements and methods to mitigate traffic impacts.</p>	Transportation (BC / AB)	With workforce split 60:40 between CNP and Sparwood (BC), there will be increased traffic on HW3. Involvement of AB Transportation and BC Transportation uncertain. Likely mitigated with shuttles.
AER Aquatics/Fisheries	<p>4.2.1 Hydrogeology Baseline [B] (iii): the potential discharge zones, potential recharge zones and sources, areas of groundwater-surface water interactions and areas of Quaternary aquifer-bedrock groundwater interaction</p> <p>4.3.2 Hydrology Baseline [B]: Describe the extent of hydrological changes that will result from distrubances to groundwater and surface water movement. (a., b., c., & d.)</p>	Baseline Groundwater / Surface Water	Interactions of groundwater recharge and specifically, the role of groundwater inputs on thermal regulation of lotic systems.
AER Aquatics/Fisheries	<p>4.4.2 Surface Water Impact Assessment [B] Describe the potential impacts of the project on surface water quality. c. assess the potential project-related and cummlative impacts of acidifying and other air emissions on surface water quality</p> <p>4.5.2 Aquatic Impact Assessment [A] Describe the potential impacts to fish and fish habitat, such as stream alterations and changes to substrate conditions or water quality and quantity, while considering;</p> <p>a. Fish tainting, suvival of eggs and fry, chronic or acute health effects, and increased stress on fish populations from release of contaminants, sedimentation, flow alterations, and temperature and habitat changes;</p>	Baseline Kinetic Test	Project located within an area with Potential Acid Generating (PAG) Rock as identified in the proponent's geological survey. PAG rock can result in acidification of downstream habitats as the rock is exposed to weathering and water. Common issue related to fisheries impacts in Gold/Metal mining. Appropriate mitigation and contingencies need to be presented to ensure significant effects do not impact local/regional fisheries.
AER Aquatics/Fisheries	<p>4.4.2 Surfade Water Quality Impact Assessment [B]: Describe the potential impacts of the project on surface water quality: a., b., c., & d)</p>	Baseline Selenium Issue	Proposed Selenium (Se) management plan unproven. Assertions were made on the concentration of Se in the overburden rock being half the concentration of the same formation found in the Elk Valley of BC (Teck CoalMining). Process of utilizing a saturated backfill zone to precipitate out Se from the contact/process water would need to be assessed by a specialist. Contingency plans should be provided to support management of contact/process water in the event the saturated backfill areas do not treat Se as predicted. No detailed assessment of the potential impacts of Se on local groundwater sources.
AER Aquatics/Fisheries	<p>4.5.1 Aquatic Baseline [A]: Describe and map the existing fish resources of the lakes, rivers, ephemeral water bodies, and other waters. For each speciies, describe composition, distribution, relative abundance, movements, and general life history parameters. Also identify any species that are: (a., b., c., & d).</p>	Missing baseline data for species abundance, composition, distribution, etc. for Gold Creek PDF 2: Page 27	Proponent was unable to obtain a Fish Research License to conduct inventory works on Gold Creek from AEP. Currently not meeting the level of detail required in the ToR, as well as the level of detail required to accurately assess the risk of the project to the sustainable populations of SARA listed Cutthroat Trout inhabiting Gold Creek. A reference to a baseline population estimate that was conducted by the ACA in 2010 is out of date and likely doesn't provide an accurate population estimate due to the continuing decline of Cutthroat. For context, the Westslope Cutthroat Trout Recovery plan estimated that the population of pure strain trout declined from 7000 - 5100 individuals between 2006 and 2012, which works out to roughly a 25% decline in population. Considering the information that is being referenced is from 2010, the current population in Gold Creek would likely be significantly reduced if it follows the overall population trends. Therefore, any results from monitoring conducted would not provide accurated results and could result in an over estimation (inaccurate) of impacts resulting from the project. Habitat Protection Order for Westslope Cutthroat Trout will affect the project and it wasn't discussed in the EIA.

AER Aquatics/Fisheries	<p>4.5.1 Aquatic Baselines: [B]: Describe and map existing critical or sensitive areas, such as spawning, rearing, and over-wintering habitats, and seasonal habitat use, including migration and spawning routes.</p> <p>4.10 Land Use and Management (related to Habitat Protection Order) [A]: Describe the existing land and resource uses and potential conflicts, considering oil and gas development, agriculture, forestry, tourism and outdoor recreational activities. [C]: Identify and map unique sites or special features such as parks and protected areas ... 4.10.2 [D]: Identify the potential impact of the project on land uses, including: (d): the implications of relevant land use policies and resource management initiatives for the project, including any constraints to development. Discuss how the project will be consistent with the intent of these initiatives. (j): impacts of the project on public access, regional recreational activities, aboriginal land use and other land uses during and after development activities.</p>	Baseline Habitat Assessment, lack of consideration of regulatory instruments affecting use of Gold and Blairmore creeks	Proponent to conduct detailed habitat assessment in 2016 (Usually done in the fall low flow period). Habitat within Gold Creek designated as Critical Habitat under SARA with a formal Protection Order. Proponent identified in CR#6 that Baseline aquatic habitat conditions were not assessed during the field programs conducted in support of the application. As the reach of Gold Creek designated as critical habitat is within the zone of influence of the proposed mine project resulting from a reduction in watershed size and a predicted 10% reduction in flows, all habitat within this zone of impact would be deemed critical or sensitive areas as defined in the ToR, and therefore should be described and mapped as required in 4.5.1 [B] of the ToR. In addition, habitat that is referenced in the EIA from previous assessments were conducted randomly in consort with a population estimate program conducted in 2002, and is therefore out of date and likely inaccurate due to the recent 2013 flood event that impacted Gold Creek. There is also concern about the 100 m and 30 m setbacks set for Blairmore and Gold creeks, respectively.
AER Aquatics/Fisheries	<p>4.5.2 Aquatic Impact Assessment [A]: Describe the potential impacts to fish and fish habitat, such as stream alterations and changes to substrate conditions or water quality and quantity, while considering: (a., b., c., d., & e)</p>	Baseline Sediment sampling	Sediment Quality baseline not conducted. Baseline sediment quality required to understand the impacts of the mine release water on downstream sediment quality and subsequent impacts on aquatic communities (periphyton and benthic invertebrates). While the majority of that information is provided, the company makes no recognition of the fact there is a new federal Habitat Protection Order for the Westslope Cutthroat Trout. The Order effectively prohibits any changes to the watersheds that contribute to and comprise of Blairmore Creek and Gold Creek. Gold Creek is located at the bottom of the eastern slope of Grassy Mountain (the project), and Blairmore Creek is located on the opposite side of Grassy Mountain. It would seem as though nearly 100% of the project would be affected by the Order.
AER Aquatics/Fisheries	<p>4.5.2 Impact Assessment [A]: Describe the potential impacts to fish and fish habitat, such as stream alterations and changes to substrate conditions or water quality and quantity, while considering: d. changes to benthic invertebrate communities that may affect food quality and availability for fish;</p>	Baseling Benthic Invertebrate Sampling	Proponent conducted limited benthic invertebrate sampling. The invertebrate community information is critical in the assessment of impacts to the Fisheries, as local species rely almost solely on invertebrates as food sources. Changes in the invertebrate communities over time through monitoring may indicate changing water quality or sediment quality.
AER Vegetation	<p>4.6.1 Vegetation Baseline [A] Describe and map vegetation communities. Identify the occurrence, relative abundance, and distribution of each vegetation community, as well as identify any species that area: (a., b., c., & d).</p>	Vegetation baseline	Benga needs to identify and inventory of protected species such as the Foothills Rough Fescue, Whitebark Pine, and Limber Pine and give us an idea on how they intend to address the removal of those species. They simply state that there is a high potential for impact to these species within the mine plan area, and do not address mitigation or re-establishment of the species.
AER Wildlife	<p>4.7.1 Wildlife Baseline [A]: Describe and map existing wildlife resources (amphibians, reptiles, birds, and terrestrial and aquatic mammals). Describe species composition, distribution, relative abundance, seasonal movements, movement corridors, habitat requirements, key habitat areas, general life history, and their use and potential use of habitats. Also, identify any species that are: (a., b., c., d).</p>	Baseline Wildlife Studies	Proponent identified in the kick-off meeting that they may not have adequate baseline wildlife information and are looking at conducting further wildlife studies this winter (winter track surveys). A cursory review of the wildlife assessment has identified that the wildlife surveys are not adequate, and further field work is required.
AER Wildlife & Other	<p>4.7.2 Wildlife Impact Assessment [A]: Describe and assess the potential impacts of the project on wildlife populations and wildlife habitats, considering: (a., b., c., d., e., f., & g) (there may be other areas of the TOR that this should be included in).</p>	Impacts of moving golf course	Benga has not address the impact of re-locating half the golf course and clubhouse, even though this is a direct result of the proposed mine development. The rail loading terminal is proposed to overlap the golf course. Some of the lands the golf course is using are Crown lands. While Benga presented a picture that they would simply "swap" lands they presently own with the golf course in order to re-locate 9 holes, they have not addressed the fact that some of those lands are Crown lands at present, held under REC910007. The Alberta Government also has its own Disposition Reservation under DRS850045 immediately adjacent to the REC.

AER Wildlife & Other	4.7.2 Wilife Impact Assessment [A]: Describe and assess the potential impacts of the project on wildlife populations and wildlife habitats, considering: (a., b., c., d., e., f., & g) (there may be other areas of the TOR that this should be included in).	Impacts of moving Alta Link power line	Proponent identified in the kick-off meeting that they did not fully address the impact of re-locating the AltaLink power line, even though this is a direct result of the proposed mine development.
AER PLA	4.10.1 Land Use and Management Baseline [A] Describe the existing land and resource uses and potential conflicts, considering oil and gas development, agriculture, forestry, tourism, and outdoor recreational activities. [B] Describe and map all Crown land and Crown reservations (Holding Reservation, Protective Notation, Consultative Notation). 4.10.2 Land Use Management Impact Assessment [B] Indicate where Crown land dispositions may be needed for roads or other infrastructure for the project.	Incorrect consideration and omission of Crown dispositions and reservations, incorrect labelling of land ownership	4.10[B] & 4.10.2[B] - Crown dispositions have been missed on mapping (oil, gas, coal TFAs, golf course and grazing leases), mapping does not accurately reflect land ownership, and there are overlapping issues with dispositions. Overlapping dispositions cannot be approved. There is a lack of detail on how these will be handled and conflicts resolved. 4.10[A] & [B] – There are 14 well sites, 11 pipelines, a powerline, 8 leased roads and a miscellaneous lease within regional study area. However, it is not addressed how the rights of existing lease holders have been or will be handled, and there is no explanation as to how the existing site infrastructure, e.g., well sites, pipelines, will be abandoned or removed. 4.10[A], [B] - Similar concerns with grazing leases.
Alberta Culture	5 Historic Resources [A]: Describe consultation with Alberta Culture concerning the need for a historic resource impact assessment for the project, and (a., b., c., d., & e)	Historic Resources	Historic background documents were not provided with the application package. Therefore, historic resources review will be delayed until this reports are provided. Multiple historical resources, including the historic Town of Lille (a historically significnat site with HRV 1), have already been located within the proposed mine permit boundary. A Historical Resources clearance letter has not been provided from Alberta Culture.
AER Socio-Economic	8.1 Socioeconomic Baseline [B] Describe factors that may affect existing socioeconomic conditions, including a. population changes;	Work demographic	Due to new demographics associated with workforce may required investment in additional schools, housing, etc. Discussion of impacts on social infrastructure is not included in the ToR so not certain if they will discuss these impacts in other sections or D61 section of application.
AER Socio-Economic	8.1 Socioeconomic Baseline [B] Describe factors that may affect existing socioeconomic conditions, including e. the planned accommodations for the workforce for all stages of the project. Discuss the rationale for their selection.	Workforce of 180 people	Conflicting details regarding camp v.s. other options
AER PLA	8.2 Socioeconomic Impact Assessment [A] Describe the socioeconomic impacts of project construction and operating, including: b. the need for additional Crown land to meet project needs	Land Access	Benga does not have anything in any section of the EIA that identifies this need. In the review of the Rail Loading Terminal proposal, the track associated with that will overlap a Recreation Lease (REC910007) that is for the golf course. It is understood that Benga is prepared to “trade” lands they own for lands they wish to acquire for the purpose of constructing the Rail Loading Terminal on top of lands the golf course presently uses. One thing that Benga has not identified is that a portion of the lands to be “traded” is actually not owned by the golf course but by the Crown under REC910007.
AER PLA	3.2.8 Conservation and Reclamation [A]: Provide a conceptual conservation and reclamation plan for the project. Describe and map as applicable, (h) reclamation material salvage, storage areas and handling procedures.	Topsoil handling, storage	Descriptions of how topsoil will be removed and handled are not consistent with provincial regulatory requirements. For example, in some cases it is indicated that topsoil will be mixed with overburden. However, it must be stored separately.
AER PLA	4.10 Land Use and Management [A]: Describe the existing land and resource uses and potential conflicts, considering oil and gas development, agriculture, forestry, tourism and outdoor recreational activities. 4.10.2 [D]: Identify the potential impact of the project on land uses, including: (f): the impact of development and reclamation on commmerical forest harvesting in the project area. Include opportunities for timber salvage, revegetation, reforestation and harvest for the reduction of fuel hazard. (g): the amount of commercial and non-commercial forest land base that will be disturbed by the project. Compare the pre-disturbance and reclaimed percentages and distribution of all forested communities in the project area.	Timber salvage and amanegment	Descriptions of how and what merchantable and non-merchantable timber will be removed and handled are not consistent with provincial regulatory requirements. For example, there is reference to mixing slash and non-mewrchantable timber with topsoil, which does address proper handling techniques for topsoil.