

**SPENCER ENVIRONMENTAL'S RESPONSES TO CITY OF EDMONTON REVIEWER'S COMMENTS FROM  
REVIEW OF THE KANATA METIS CULTURAL NATURAL AREA AND RESOURCE EXTRACTION REVISED EIA  
8 March 2011**

*City of Edmonton Review*

| Review Comment  | Response   | EIA Report Sections Reference |
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| <b>OFFICE OF NATURAL AREAS (DAVID MCKEOWN)</b>  |  |                               |
| Response to Comment #4: <i>“As a condition of approval, the regulator could request annual activity update plans, and/or a new 5 year plan, should the extraction process exceed the original 5 years contemplated.”</i> Please define “regulator”. What assurances can be made that the mine life will conform to the 5 year plan that has been proposed?  | <ul style="list-style-type: none"> <li>• Regulator is defined as Alberta Environment under the <i>Code of Practice for Pits</i> in conjunction with the <i>Environmental Protection and Enhancement Act</i>, the <i>Conservation and Reclamation Regulation</i> as well as the <i>Water Act</i>.</li> <li>• The maximum mine life of 5 years will be a condition of the City of Edmonton’s Development Permit. Alberta Environment does not place those conditions on Pit Registration approvals.</li> <li>• The proponent will submit annual activity update plans to the City of Edmonton and to Alberta Environment.</li> </ul> | N/A                           |
| <b>Groundwater movement (various comments):</b><br>Determination of the east-west groundwater movement has been identified by a number of reviewing agencies as a deficiency in the original submission; however, this concern has not yet been adequately addressed. Instead, this concern has been put off to be dealt with as a condition of approval. It is ONA’s opinion that it is inappropriate to defer investigation of potential impacts related to a specific project as a condition of approval. Furthermore, if an approval was granted prior to resolving these concerns, what changes to the development | <b>Sameng Response:</b> As presented to the City on February 25, 2011, the shallow groundwater direction is from south to north through the proposed project area with a west to east component that eventually discharges to the North Saskatchewan River. Regardless of the easterly groundwater movement component, this will not affect the mining plan/operation or reclamation of the proposed pit nor will it have any adverse environmental effects to the   | N/A                           |

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| <p>plan would be made in the event groundwater impacts arise from additional investigation?</p> | <p>wetland, west of 199th Street or to the east of the proposed pit operation. The City accepted this explanation, and, therefore, does not require determination of the west to east groundwater component prior to development as a condition of approval. However, once the west to east groundwater directional component has been determined, this information will be provided to the City. As discussed amongst the project team, this information can be obtained by constructing a pit into the sand and gravel layer east of the existing piezometers and correlating the groundwater level in the pit with the three existing piezometers.</p> <p><i>Direct Hydraulic Connection Between Surface Water and Groundwater:</i> Based on further review of existing data and a field reconnaissance conducted of the project area in the fall of 2010, it was determined that there is no direct hydraulic connection with the surface water in the wetland west of 199th Street and the groundwater levels in the proposed pit area. Elevations obtained from GPS surveys showed that water levels surveyed in the wetland west of 199th Street and the two existing dugouts located on the Kanata property were higher than the groundwater elevations obtained in the three piezometers. This indicates that there is no direct connection between the groundwater and</p> |                               |

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|                | <p>surface water and would imply that the underlying soil in the wetland is impervious.</p> <p><b>Spencer Environmental Response:</b> The apparent direction of shallow groundwater movement on the project site, as confirmed by way of installed piezometers, is from south to north, although an easterly component is expected, as shallow groundwater is ultimately expected to discharge into the North Saskatchewan River. The primary reasons for determining the significance of east/west direction of groundwater flows relates to assessing the effects of any altered groundwater regime on two important environmental receptors. Specifically, those receptors are a wetland located across 199 Street and to the west of the proposed extraction area and a backwater of the North Saskatchewan River bordering the east project area.</p> <p>It has been postulated by some stakeholders and reviewers that the subject wetland is hydraulically connected to groundwater conditions in the proposed extraction area and that dewatering activities in the extraction area could alter the regime, thereby adversely impacting the wetland, especially in a case where the west movement of groundwater was significant.</p> |                               |

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|                | <p>It was further postulated by some stakeholders and reviewers that the river backwater was a critical fish habitat, especially for those species dependent on groundwater upwelling for some of their important life functions (e.g. spawning). It was further contended that an important source of groundwater to the backwater was the proposed extraction area and altering flows in the extraction area could adversely impact the backwater.</p> <p>Stakeholders had recommended additional geohydrological investigations to quantify any east west groundwater movement, especially with regard to those receptors. Kanata had proposed additional groundwater investigations (placement and monitoring of additional piezometers) to assess the east-west movement of groundwater as a condition of project approval.</p> <p>Kanata undertook further hydrological investigations at the project site and reanalyzed hydrological information collected for the proposed extraction area in 2010. In addition, Kanata undertook fish and fish habitat investigations in the backwater.</p> <p>Hydrological field investigations conducted in</p> |                               |

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|                | <p>summer of 2010 determined that based on differing water levels in piezometers installed in the project site and surface water levels in the subject wetland, that the wetland could not be hydraulically connected to groundwater conditions in the proposed extraction area. In fact, field observations indicated that the subject wetland is more likely receiving water input by way of seepage originating from terrain above the river valley (above the valley crest). Further, in the opinion of Kanata's groundwater consultants, the systematic and progressive mining method will assure that the groundwater regime in the extraction site will not be significantly altered. That is because groundwater removed from a block to be mined will be immediately pumped into an adjacent block thereby maintaining a groundwater equilibrium at the mine site. Many years of experience by Alberta Environment with similar gravel extraction operations in river valleys has lead to the conclusion that groundwater conditions are not significantly altered when this method of dewatering as part of the mining process is used. That conclusion is a contributing reason for why Alberta Environment does not require granular extraction operators to secure a water license to remove water for such operations.</p> |                               |

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|                | <p>Fisheries investigations were conducted in a three-season study (30 April 2010, 1 June 2010, 28 October 2010), considering the basic life history requirements of northern pike and mountain whitefish. Those investigations were to determine if there were any fish species using the backwater for critical life functions and dependant on groundwater inputs (e.g. mountain whitefish for spawning and rearing). No evidence of groundwater dependant species using the backwater was obtained. In fact, it was determined that surface water input from the river was a more important factor in sustaining the backwater. Inspections of the backwater at times of year best suited to exhibiting visual evidence of incoming groundwater indicated no such inputs.</p> <p>In summary:</p> <ul style="list-style-type: none"> <li>• The method of progressively dewatering portions of the extraction area and immediately pumping that water into an adjacent extraction area greatly reduces the potential for altering the groundwater regime of the area during gravel extraction operations.</li> <li>• The wetland located to the west of 199 Street is not hydraulically connected to the gravel extraction area and its water</li> </ul> |                               |

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|   | <p>levels will not be affected by gravel extraction operations.</p> <ul style="list-style-type: none"> <li>• The North Saskatchewan River backwater does not harbour fish species dependant on groundwater upwelling for any of their important life functions. It is not critical fish habitat and is more dependent on lateral surface water inputs from the river than any other potential sources.</li> <li>• Reclamation plans will not be affected by the present or future groundwater regime.</li> <li>• Now that the concern for the wetland and river backwater has been addressed, the necessity for quantifying the east-west groundwater movement is no longer an important information piece. That information can be provided to the City of Edmonton by monitoring water movement and levels during gravel extraction operations. Additional piezometers to measure east-west groundwater movement are no longer necessary.</li> </ul> |                               |
| <p><b>Response to Comment #17(c):</b><br/> <i>“It would be possible to undertake a survey immediately prior to site development to confirm the presence of hibernacula.”</i><br/>           Such a survey is warranted and should be a condition of</p> | <p>The project proponent will undertake a hibernacula survey prior to extracting gravel.</p>   | <p>N/A</p>                    |

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| approval.  |  |                                     |
| <p><b>Response to Comment #19:</b><br/> <i>“This statement was intended to emphasize that the sounds of the mining equipment would be similar to other machinery working in the semi-rural (farming) environment. The steady operation would become a regular part of the net sound environment, even though it is not part of the current background.”</i></p> <p>ONA requires changes to the EIA document that clearly state noise associated with the proposed gravel operation is not part of the background. An indication of potential impacts, severity and duration with respect to noise and wildlife should be discussed in Section 6.2.3 (Noise).</p> | <p>Background noise level measurements were not obtained for this noise assessment. Obtaining such measurements does allow a quantitative assessment of the severity of any change from the background condition when the project is superimposed on the project area. For instance, a change in noise levels from the project of 5dBA could be quantified as a significantly adverse impact, especially if values at a receptor location were greater than the noise policy threshold value of 65 dBA. For this project, information was available from similar operations and equipment to be able to predict what noise levels would be at several receptors located in the vicinity of the extraction area and the haul road. Even at a distance of 15 m, gravel trucks produce sound levels (67-70 dBA) only marginally above the City of Edmonton’s noise threshold of 65 dBA established for Edmonton residential areas. But at the project site, receptors (e.g., residential) are further away from the gravel extraction area than 15 m. In fact, most residential receptors along the haul road should experience noise levels less than 55dBA and in some cases noise levels less than 45dBA.</p> <p>The actual mining equipment will emit the greatest noise levels at source, but that</p> | <p>See attached addendum letter</p> |

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|                | <p>equipment is located well away from residential receptors in the mine vicinity and noise levels are predicted to fall below the 65 dBA threshold very quickly as distance from the source increases. If the mining equipment was to be located closer to the residences and had higher noise levels at source, it would make more sense to establish background levels. It would also be more appropriate if the extraction operation was a permanent or long-term facility, but in this case, the operating life of the project is proposed as a maximum of 5 years. Another factor to consider is that the noise modeling does not account for the suite of mitigation measures that the project proponent has identified in the EIA document as available for use.</p> <p>Those same factors need to be considered in assessing the impacts of noise on wildlife. The project will represent a temporary disturbance and the suite of animals that were determined to be using the project area did largely represent those that were urban tolerant species.</p> <p>In consideration of the comments expressed by City of Edmonton Office of Natural Areas, however, and for purposes of the EIA, the mining equipment and trucks will not be considered as part of the existing background</p> |                               |

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|   | <p>environment. Further, potential noise impacts without mitigation have been re-evaluated as adverse, minor, temporary and predictable. With mitigation in place, the severity of adverse impact is rated as negligible to minor, adverse, temporary and predictable.</p>   |                                     |
| <p><b>Response to Development Permitting Section Third Comment:</b><br/> <i>“To-date, no comments have been received from Alberta Environment regarding their determination regarding the altered and degraded wetland on the subject parcel.”</i><br/> Please note that the lack of response from Alberta Environment does not indicate this is not an issue that requires resolution. Written verification from Alberta Environment is required pursuant to any requirements for a Water Act approval. COE requests a copy of this documentation as a condition of approval.<br/> Please also note that Ministerial consent for the proposed project must be provided in writing to the COE as a condition of approval.</p> | <p>No provincial government department will comment on this proposal and provincial applications until such time as the City of Edmonton expresses their satisfaction with the project proceeding and informing the province of such. At that time, the Province of Alberta will conclude its review of the project and process provincial applications.</p> <p>The project proponent is well aware of permitting requirements pursuant to the Alberta <i>Water Act</i> and will apply for whatever permits are deemed to be required. The project proponent will supply City of Edmonton with correspondence with respect to any <i>Water Act</i> applications or, for that matter, Public Lands applications with respect to potential wetlands on the subject property.</p> | <p>N/A</p>                          |
| <p><b>Response to DFO Comment #2(ii) and (iii):</b><br/> <i>“Groundwater will continue to flow through the replacement aquifer, but likely at a reduced velocity. Groundwater not flowing through the replacement material would flow around</i></p>  | <p><b>Sameng Response:</b> The groundwater mounding prevention system is proposed to be installed as part of Kanata’s reclamation plan. Groundwater mounding may occur within the</p>  | <p>See attached addendum letter</p> |

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| <p><i>the mined areas. With a reduced permeability we do expect an increase in hydraulic gradient.”</i></p> <p><i>“A groundwater mounding prevention system will be installed as the gravel extraction area is progressively reclaimed to ensure that there will be no adverse effect caused by water-level mounding in the area southwest of the Kanata property.”</i></p> <p><i>“The sand aquifer will not act as a dam/weir across the entire width of the aquifer but, rather as a local obstruction (like a large boulder or a small island in a river), forcing the groundwater to flow around it.”</i></p> <p>This will be a permanent obstruction of groundwater, thus the impact summary in Table 6.5 should reflect this timeframe (currently rated as Adverse, minor to major, temporary, predictable).</p> | <p>proposed project site as a result of the replaced sand aquifer with the removed gravel layer. Once the pit area has been reclaimed, groundwater will continue to flow in northerly direction towards the North Saskatchewan River, but with a reduced permeability and increased hydraulic gradient (within the pit area). Groundwater flow outside the proposed pit area will be unaffected and will continue to flow as it always has. If groundwater mounding does occur, it will occur within the river valley (terrace) area to the southwest and is not expected to come to the existing ground surface. It has been determined (by HCL) that the potential groundwater mounding has been calculated in the order of 1.5 meter higher than the 2007 groundwater elevations.</p> <p><b>Spencer Environmental Response:</b> DFO comments and questions concerning groundwater were precipitated by a concern that the backwater of the North Saskatchewan River was a critical habitat for fish and that that habitat was somehow dependant on groundwater inputs from the area proposed for extraction. Fisheries investigations conducted by the proponent during 2010 determined that the backwater was not a habitat critical to fish and certainly not for those species dependent on groundwater sources for critical life functions.</p> |                               |

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|  | <p>In fact, investigations conducted by the proponent determined that the sustainability and habitat function of the backwater was more dependent on surface water inputs from the river. No evidence of groundwater entering the backwater was observed although conditions for detecting this were favorable at the time of the site investigations.</p> <p>Please also see the response to “Groundwater Movement” above.</p> <p>As per the attached addendum letter, the impact rating has been revised to adverse, minor to major, permanent, predictable to reflect the permanent nature of the replaced sand aquifer.</p> |                               |
| <p><b>Monitoring (various comments):</b><br/>The Code of Practice for Pits is fairly limited in requirements for monitoring and reporting with the exception of pit water monitoring prior to releases. COE requests that annual activity update plans and monitoring reports be made available to the COE as a condition of approval.</p> | <p>The project proponent plans to develop an Environmental Management System for the project. The EIA document preparation was part of that System. An Environmental Protection Plan (EPP) will be another component of the System. Environmental monitoring and surveillance will be part of the Environmental Protection Plan. Conditions of any provincial environmental permits and any City of Edmonton Development Permit conditions will also be incorporated within the EPP. The project proponent will work with the City of Edmonton in forming the plan and a schedule of environmental monitoring and</p>           | <p>N/A</p>                    |

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|  | reporting. It is anticipated that there will be some interface with respect to the EPP and the Community Liaison Committee proposed by Kanata.  |                               |
| <b>DEVELOPMENT PERMITTING SECTION, PLANNING AND DEVELOPMENT DEPARTMENT (Kirk Bacon)</b>  |   |                               |
| The additional piezometers proposed as a condition of approval should be installed and the results submitted as part of this EIA. Page 108 of the EIA acknowledges that there remain unknowns with regard to groundwater flows. Potential impacts to the wetland to the west and to the North Saskatchewan River should be understood prior to excavation.   | Please see the response to “Groundwater Movement” above.  | N/A                           |
| <b>ENVIRONMENTAL MONITORING SECTION, DRAINAGE SERVICES (Liliana Malesevic and Xiangfei Li)</b>   |   |                               |
| 1. Water wells: the reports presented water wells survey results and communications with some active well users regarding the impact of this project on well water quality. Water intake may affect groundwater flow direction. Please confirm if water intake can affect groundwater flow direction. If it does, groundwater contamination if occurred from this development can possibly affect well water quality as well as wetland water quality in case the groundwater mounding impact wetland. | 1. Water Wells: The water wells that fall within a 1000 metre radius of the proposed pit development that may be impacted by the proposed development (as per HCL’s report) are as follows:<br>Howard Water Well SE19-51-25-W4M: This is a bored well with a corrugated metal casing (culvert) that is no longer in use by the landowner. This well is completed within the sand and gravel aquifer to be mined and is located adjacent to the southwest corner of the proposed pit development.<br><br>Schekter Domestic Water Well LSD13-17-51-25-W4M: This well is located approximately 400 meters south of the proposed pit development and is completed within the sand | N/A                           |

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|                | <p>and gravel aquifer to be mined and is in use as a water supply. The water well is situated upslope from the proposed pit development.</p> <p>All other water wells that are identified in HCL's report are located outside of the river valley (terrace) area and will not be impacted by the proposed gravel mining operation from surface water drainage or groundwater flow. The dewatering process for the proposed pit development will not change the groundwater flow direction involving the two water wells within the river terrace area, since the groundwater flow is from south to north, and both water wells are located upslope from the proposed pit development. This is also the same for surface water drainage. Both water wells are located upslope from the proposed development, and therefore, no surface water can drain from the proposed development to these water wells. Because the dewatering process for the proposed pit development is being managed on site, meaning that the groundwater that is pumped from the gravel aquifer (mining block) will be pumped back into the gravel aquifer in the same area from which it is being pumped from, there will be no impacts to the groundwater levels associated with these two water wells. Since it has been determined that the wetland west of 199th</p> |                               |

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|   | <p>Street does not have a direct hydraulic connection with the groundwater (gravel) aquifer, the wetland will not be affected by the dewatering process for the mining operation. This is also the same for any potential contaminates resulting from the pit operation, which will not occur. Kanata will be conducting refueling/repairs of mining equipment on a clay surface that is located outside and slopes away from any exposed gravel aquifer (pit area) and will be confined to an enclosed ground surface area of the mining operation, thereby preventing any surface runoff water reaching the wetland west of 199th Street or any water wells located upslope from the proposed development.</p> |                               |
| <p>2. Two non-functional culverts: the two centerline culverts (Figure 2) are, currently, not in use and are plugged off. However, background information about these two culvert need to be provided to help to assess if there is possibility that they will be put in use in the future because the use of these culverts will result in direct flow transport between the gravel extraction site and wetland.</p> | <p>2. City's Culverts: These culverts are located within the City's 199th Street road grade. Based on further review of existing data and the field reconnaissance conducted of the project area in the fall of 2010, these culverts are presently plugged and are non-operational. Elevations obtained at the inverts of these culverts show that if operational, these culverts would drain from west to east, meaning that they drain the wetland west of 199th Street onto the Kanata property. In order to ensure that area surface runoff flows to the wetland west of 199th Street, it is suggested that the City replace these culverts so that they drain from</p>                                      | <p>N/A</p>                    |

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|   | east to west into the wetland thereby ensuring the future sustainability of the wetland. |                               |
| <b>ENGINEERING SERVICES, TRANSPORTATION DEPARTMENT (Paul R. Lach)</b>   |  |                               |
| <p>In reference to the remedial measures needed to stabilize the existing slide, it was noted that “as a minimum, the recommendation for ditch improvements provided in the AD Williams (1998) Report should be considered especially if the work can be done in conjunction with upgrading of the road.” The proponent and geotechnical consultant should be made aware that these recommended ditch improvements were already constructed in 1999, and the contract drawings are available in Engineering Services Files. Since the ditch improvements were undertaken to improve the surface drainage conditions at a time when traffic frequency was comparatively very sparse, it must also be recognized that a much more comprehensive slide repair will be required to adequately support the roadway for proposed use as a haul route. As an example of the level of repair anticipated to be needed, the aforementioned AD Williams Report also identified alternative stabilization measures involving construction of a pile retaining structure constructed along the downslope side of the roadway."</p> <p>The development proponent would be responsible for all engineering design and construction aspects for stabilization of the landslide impacting the roadway (comprehensive slide repair for stabilization of the roadway proposed for use as a haul route).</p> | Geotechnical requirements will be included in the Development Permit.                    | N/A                           |

*Province of Alberta Review*

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| <b>ALBERTA ENVIRONMENT</b>   |                 |                                      |
| <ul style="list-style-type: none"> <li>Revised EIA submitted; Alberta Environment advised they are waiting on City’s decision prior to completing their review.</li> </ul> |                 | N/A                                  |
| <b>ALBERTA SUSTAINABLE RESOURCE DEVELOPMENT , SENIOR WILDLIFE BIOLOGIST</b>  |                 |                                      |
| <ul style="list-style-type: none"> <li>See response for Alberta Environment</li> </ul>   |                 | N/A                                  |
| <b>ALBERTA SUSTAINABLE RESOURCE DEVELOPMENT, SENIOR FISH TECHNICIAN (Daryl Waters)</b>   |                 |                                      |
| <ul style="list-style-type: none"> <li>See response for Alberta Environment</li> </ul>   |                 | N/A                                  |
| <b>ALBERTA SUSTAINABLE RESOURCE DEVELOPMENT, PUBLIC LANDS (Wayne Holland)</b>  |                 |                                      |
| <ul style="list-style-type: none"> <li>See response for Alberta Environment</li> </ul>   |                 | N/A                                  |

*Federal Reviewers*

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| <b>ENVIRONMENT CANADA</b>  |  |                                      |
| <p><u>Existing Wetland:</u><br/>           In Figure 1.2, <b>Site Plan</b>, page <b>three</b> of the EIA, EC notes that there is a large existing wetland and beaver pond abutting the west side of the project area. <b>EC requires clarification whether the gravel operation will modify the hydrology of the wetland and result in the drying up of these wetlands. EC recommends that monitoring, mitigation, and adaptive management efforts be developed and put into place to ensure that the integrity of this wetland is maintained.</b></p> | <p>Please see the response to “Groundwater Movement” above.</p> <p>In addition, monitoring, mitigation, and adaptive management efforts will be developed and implemented to ensure that the integrity of the wetland (west of the Kanata property) is maintained. That will be done by way of the Environmental Management System and Environmental Protection Plan (EPP) that is outlined in the response to ONA's comment regarding monitoring.</p> | N/A                                  |

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| <p><u>Reclamation Wetlands:</u><br/> EC notes the two reclamation wetlands proposed in Figure 2.3, <b>Reclaimed Contour</b>, page <b>twenty</b> of the EIA. It is important that these two reclamation wetlands hold water. <b>EC requests clarity whether these basins will retain water.</b> EC also notes that should water levels remain low in the reclaimed wetlands that there will be an absence of littoral zone. It is important that both reclaimed wetlands have littoral zones (e.g. less than 2m in depth) to make the wetlands more productive and attractive to wildlife. The south reclamation wetland does not appear to have a good littoral zone. <b>EC recommends that consideration be given to adding a littoral zone to this wetland.</b></p> | <ul style="list-style-type: none"> <li>• The two reclamation wetlands will retain water as they will be tied into groundwater.</li> <li>• Refer to Figure 2.3 in the EIA – littoral zones are included in the proposed wetland design.</li> </ul> | <p>N/A</p> |
| <p><b>DEPARTMENT OF FISHERIES AND OCEANS (Brandi Mogge)</b></p>   |   |            |
| <ul style="list-style-type: none"> <li>• Revised EIA submitted; Ms. Mogge informed us that DFO’s review will not be complete until mid- to late March 2011.</li> </ul>  |   | <p>N/A</p> |