

From: [Carl Hunt](#)
To: [Robb Trend Coal Mine Expansion Project \[CEAA\]](#); "Kevin Peters"
Cc: "McDonald, Kari"; "Van Bostelen, Ross"; "Jim"; [jennifer.koppe](#) [Steve Bradbury](#); [Imhof, Jack](#); [aen-coal@](#) <email addresses removed> ["Brittany Verbeek"](#); [Alpine Art Eco Tour Ltd.](#); [Darryl Smith](#)
Subject: RE: Robb Trend - Aquatics Information and Public Comment
Date: January 16, 2015 11:44:03 PM

Canadian Environmental Assessment Agency
160 Elgin Street, Ottawa ON
K1A 0H3

Jan. 16th, 2015

Attention: Brett Maracle, Panel Manager,

Re: Robb Trend Mine proposal 'Public Comments'

Dear Sir,

I appreciate Robb Trend efforts to provide additional information, in the form of multiple technical reports, following the Public Information Session (which had minimal content) but CVRI or AER apparently missed a couple of my comments at the Public Review.

1. The unreported quantity and complexity of the information is overwhelming for private citizens or local environmental groups that are concerned about the cumulative impacts on renewable resources and the long term impacts on our local watersheds.
2. The mine's Public Review only provides a broad look at a single mine proposal from an industry perspective and didn't even advise the public about riparian buffers on fish bearing streams or mention the habitat disturbance for several 'Threatened' salmonids or the length of streams that would be permanently destroyed by a relatively short term mining process.
3. Where are the experts in the Alberta Public Service (ESRD, forestry, fisheries, wildlife, water management etc.) that have the expertise and experience with coal mines that could/should represent a much wider public interest, benefits and cost to other resources? For example: Obed Mine Spill, Oct 2014, release of flocculants and sediments or records of clean-up orders, repeated water quality problems at Coal Valley in 2012 & 2013 etc. <http://alberta.ca/release.cfm?xID=3604095E1126C-CF40-CA11-065F971389C70EC3>
4. The process doesn't summarize what has occurred at existing mines in the McLeod River watershed regarding, current impacts or reclamation to "original productivity" etc.? Other mines in the McLeod watershed produced excessive sediment loads over the life of the mine, so what are the projected impacts on the receiving waters of the Erith & Embarrass and over how many decades?
5. The cumulative impacts of mining, oil, gas, forestry and associated roads, pipelines etc. (sediment, hanging culverts, riparian damage, canopy removal) should be

considered and assessed under a watershed plan (LUF?) that recognizes the biological limits of renewable resources or at least informs the public of the short and long term damage.

As a member/volunteer of a local environmental group 'West Athabasca Watershed Bio-regional Society', we reviewed the Vista Mine proposal including many technical reports and submitted recommendations to the ERCB for watershed protection etc. We didn't reject the mine but wanted to encourage environmental protection. We struggled with reviewing locked documents, downloads that didn't download, dealt with various company staff, admittedly with some confusion caused by our society (and me) trying to meet short deadlines. In the end it didn't matter because members of the public (or organizations) didn't qualify or get 'standing' to formally object to the impacts on public land. The public was defined as not directly affected, unless they owned a lease or had a direct economic interest on the mine site.

I went through this process of downloading hundreds of pages of consultant reports with the Vista Mine (and Robb Trend –Aquatics & Mine Pit lakes reports, from links now cancelled) but won't repeat the process. Providing reams of technical reports to an individual or ENGO is unfair unless it includes an accurate summary of the environmental records of existing mines and potential impacts of the proposed mine, that contains 'agreed facts' validated by ESRD and AER. Information should be easily available and comprehensible to the public. Public Review on Jan 13-16, 2015 with a comment deadline of Jan 20th is unreasonable, particularly with the lack of recommendations to avoid the damage of a mine trenching through numerous headwater tributaries.

In 1966, the Embarrass River produced an Alberta Size Record for Arctic grayling, 2lbs. 13oz. that stood for at least 20 years. From reading the 2011 mine reports, I suspect Robb Trend has extensive fisheries data about fish distribution, species composition and other generalities that weren't provided to the public. I also suspect that important information about critical fish habitat, including spawning and wintering areas or movement studies are lacking but essential to evaluate and mitigate mine impacts.

Perhaps the Joint Review Panel will provide a fair, balanced and transparent process but reviewing the technical data without input from or access to the experts in the Alberta Public Service, is an unreasonable task for individuals or small groups of volunteers. With only an industry description of the proposed mine, the general public gets a very narrow view of the benefits and none of the hidden environmental costs. So far the review is primarily a public relations opportunity to promote the coal industry.

Sincerely,

Carl Hunt

<contact information removed>

C.c. Alberta Energy Regulator
Environment Sustainable Resource Development
Athabasca Bioregional Society
Alberta Wilderness Association
Obed Mine Spill Group
Trout Unlimited Canada
Alberta Fish & Game Assoc. Fish Chair
B.c.c. General public

From: Kevin Peters
Sent: Friday, January 16, 2015 9:18 AM
To: <email address removed>
Cc: McDonald, Kari; Van Bostelen, Ross (RVanBostelen@westmoreland.com); Jim
Subject: Robb Trend - Aquatics Information

Hello Carl,

The following reports I would like to deliver to you for review but the **size of the documents are too large to send via email**. I will set you up on our company FTP Site – shortly you will receive an email from Millennium (MEMS) instructing you how to access the files. The following files will be available for download:

- Consultant Report #2 – Fisheries (March 2012)
- Consultant Report #3 Appendix B – selenium concentrations from the Coal Valley Mine’s groundwater monitoring wells
- Supplemental Information Request (SIR) #1, #2, and #3
 - SIR#1 → ESRD Section 5.2, 5.3, 8.1, Appendix 86 are directly related to fisheries but there are other responses also connected to fisheries; ERCB Section 8
 - SIR #2 → Section 3.3, Appendix 20
 - SIR#3 → Section 2, Appendix 1 (DFO – Preliminary Fish Compensation Outline Project Update and Revised Discussion Report), Appendix 2 (AER Supplemental Document to SIR #3 Mine Plan Update)

If you have any further questions, concerns or would like to see something else please let me know.

Thanks,

Kevin Peters | B.Sc., EPt. | Project Manager, Regulatory
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