

I'm deeply concerned about the NWP EAC application to mine the Crown Mountain project. Let me start by saying I'm surprised that an inadequate submission such as has been allowed to enter the public meeting format given its lack of details and answers to many pertinent questions. I'm also concerned that we would allow a presence of 34 years at this site for a project that amounts to slightly more than 29 million clean tons of coal (not sure if that's the actual number or not as they state ROM volumes of 49 million and then declare it to be 60 million. However, basing that on a 15 year mine span at 1.95 clean per year on average and a 49% predicted yield). The 29 million clean tons is equivalent to the existing 4 mines (within the Elk Valley) yearly output. So, we are going to disturb the last unaltered drainage, one which has unaffected clean water that bears west slope cutthroat trout, for coal that could easily be produced by mines which have already broken ground, have proven track records and infra-structure to easily absorb that volume. Doesn't make any sense. Their application indicates no significant cumulative affects to water quality or quantity. Their plan to deal with selenium and nitrate release is to build a layer cake dump design and to dump rock in excavated pits. When pressed on their lack of ability to prove the layer cake design works or show scientific evidence of such, they quickly diverted the question and answered they will implement C-Can type water treatment facilities. Why are the specifics of this and an actual plan not included in their plan and submission? Water quantity is not affected yet they plan on building ponds on grave creek and utilizing that water. Given the low levels of snowpack we now receive I don't see how grave creek volume isn't affected. They plan on drawing water from the infilled pits once completed. Has a complete hydrology study of the water generated, and pit design been made? Once those pits fill with water (which may take years) they will decant water to surrounding drainages, has that been properly assessed. How will that water be treated? They claim there are no significant affects to avalanche chutes, yet they are dumping in the west alexander which is a series of avalanche chutes throughout the dump platform. The east facing slope of the pit areas (alexander east is a series of avalanche chutes). Both the West and East alexander slopes, affected by this project are prime grizzly bear feeding areas and breeding areas in the spring, summer and fall. They will be adversely affected. If any mined rock gets into those east facing chutes (and it will) it will leach into the east alexander drainage. There are no significant effects to noise, dust, recreation, community health or well being, human health or wildlife health. This is simply not true. Their plan is to haul 1.95 million clean tons down the only access to this area and many more areas to the north. An area with limitless recreational opportunities and a vibrant population of a variety of wildlife species not excluded to Rocky Mountain bighorns and Mountain goat. In fact the entire West Alexander is a migratory route for all ungulates and grizzly bears. Offering connectivity from the Erickson range to the Mount Salter range and ultimately the Line Creek range. Has this been considered? The West Alexander also has historical significance as a human movement corridor, this is evident but looking at historical trails and old building sites (which incidentally will be buried by the proposed West Alexander dump design). Using high-way legal trucks (max loads of 40 tons) on a 12 meters road. That amounts to 50,000 loads of coal (one way – 100,000 two way) travelling to a loadout facility which has not yet been properly assign or designated. That volume of traffic doesn't include suppliers, contractors, mine workers etc... How does that volume of traffic not have any significant affects? That's laughable. The details of this have not been properly looked at or considered. As well they are travelling through a canyon with active avalanche chutes present. How does their plan intend to deal with that and with emergency access should the primary route be blocked?? They claim no significant affects to Migratory birds or Raptors yet there is significant affects to old growth timber? Interesting considering old growth timber especially with these aspects are prime nesting grounds. In short many questions concerning environmental impacts have not been

properly analyzed or thought through. From a mining perspective there are equally as many questions. Their predicted yield on such a small ROM volume is 49% (not a great outcome). It bears mentioning that this is predicted from large volume coal core samples from exploration drilling. This coal does not include the inherent dilution which comes from blasting, recovering, stockpiling and blending. It is therefore safe to assume that actual yield will be lower. What happens if ground is broken, and mining commences, and the actual yield is considerably lower?? Then what? Has their pit walls and dump designs gone through sufficient geotechnical evaluation?? What about dump runoff predictions and impacts? What about green house gas effects, again considered to be insignificant. Yet all equipment used is planned to be Deisel powered and as we all know exposed coal emits methane gas!! Both are significant contributors of carbon! I thought we were looking at limiting our carbon footprint and investing in renewable energy projects. NWP claims they will limit the amount of emulsion type explosives to try and limit nitrate release. Yet their pits are small and confined which would indicate water issues. This means constant dewatering will be required to load bagged dry explosive product. This creates many issues and slows pattern loading considerably. Will this happen (loading bagged dry product) or will slurry products (Which release significant nitrates) prevail? Again, has this been adequately analyzed and considered (especially with proposed up dip mining)?

What about land use and access on the west side of Alexander. How will this be impacted by blasting and evacuation requirements?

What about hiring a work force?? The current 4 active mines cannot hire enough people how will NWP?

What about the increase in traffic on HW43 which already is severely overloaded resulting in frequent animal encounters and accidents?

What about the fact that there is no housing opportunities in the local communities (Elkford, Sparwood, Fernie)?

Literally I could go on and on but I wont. I have worked in the mining industry in the Elk Valley for over 30 years. I support and agree with resource extraction but only when it makes sense. This project does not make sense. In short, this project and this application have far more questions than answers. The Elk Valley has had its share of coal mining and has created enough legacy issues let's not create more! I respectfully ask that this project be disapproved.

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