

Proposed Information Requests on the Sufficiency and Technical Merit of the Environmental Assessment

Participant: Jim Lucas

Organization (if applicable): Not applicable

General Comments:

I have previously submitted a comment regarding this project. One of my main concerns was Riversdale's choice for the coal loadout. At that time, the Golf Course Figure 8 was presented by Riversdale as the "public's preferred choice" (from a selection from which they excluded locating the loadout near the coal processing plant).

Per Riversdale's August 2016 Project Update Section A.7.3.1, they state for the **Blairmore Creek Trail Track #1** option "The technical rating for this option is tied for second and is considered technically feasible." They further consider the economic analysis but fail to adequately address the social costs of their choice namely proximity to the town of Blairmore, visual impact, noise and dust. In my opinion, these adverse factors are likely to strongly inhibit future development in the vicinity of the loadout as well as lower the value of existing developments.

In view of the potential for further mine developments directly north and to the west of the proposed Grassy Mountain Project - Atrum's Elan South and Montem's Chinook North prospects – it would seem appropriate to consider the bigger picture. A rail spur line similar to Riversdale's Blairmore Creek option might be built in the first instance to satisfy Riversdale's transportation needs then extended if required for Atrum.

I am not technically qualified to assess the feasibility a rail line as suggested but presumably the Joint Review Panel can request a basic report to determine whether this warrants further study.

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Information Source (section or page# of EIS, Addenda, Responses to Requests for Information, etc.)	Rationale	Proposed Information Request

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<i>Please use as many pages as necessary.</i>		