

April 28, 2020

Dear Panel Manager:

We have the following concerns and questions regarding Addendum 11 dated March 2020, submitted by Riversdale Resources.

The section on Air Quality from pages 2 to 10 only discussed data collected on wind speeds and equations used to calculate "*potential wind-blown dust generation*". Our concerns and questions from our letter of October 21, 2019, has not been addressed. Except for vague generalities on Page 8 about keeping "*trees and bushes preserved around mines, plant and loadout...*"

*Reduce the generation of wind-blown dust...Envirobind DCT will be applied...*"

No specifics have been given. The only drawing we were given shows a loadout approximately 30 meters high. There was no landscape design included in the package showing where these trees (or the size of trees or berms) will be planted or left around the mine sites and loadout. There are no details about how these "green belts" will be maintained. There is still no response on how the loadout can be called "enclosed" when both sides are open to allow rail cars in and out and no explanation on how "Envirobind" is going to help when coal is being dumped and the wind is blowing into the loadout area.

Under the Section of Land Use and Land Management on Page 12, Benga says they will "work towards obtaining necessary consents". There are no details given as to the timeline that these consents will be obtained or are required.

Please note this. We have tried to contact Alberta Environment and Parks about these dispositions and they are unable to help us with any details or information about Riversdale's application for consents. When we contacted Riversdale directly, Claire Roger's email response was to quote from the Addendum, "*Benga continues to work towards obtaining necessary consents through cooperation with the respective representatives with the AEP.*" This just repeats what we already knew.

On Page 29 - Table 6.5-2 under "*Mitigation measures that will be implemented to reduce adverse effects on wildlife habitat include...*" it says: "*vegetated buffer zones will be maintained to the best extent possible...*". Again, there are no details on how these zones will be maintained and what does the phrase "best extent possible?" mean?

On Page 30 under "*Mitigation measures to reduce adverse effects on wildlife health...*" it says: "*Provide a water management program that ensures the surface water quality is maintained*". Again, there are no details about this water management program. Under "*Mitigation measures that will be implemented...reduce adverse effects on wildlife movement include:*" it says: "*A minimum of six wildlife crossings (underpasses and overpasses) will be incorporated into the design of the coal conveyor:*" Again, there are no details or drawings on where the crossings will be, no details or drawings on how these will be designed, no timeline on when these crossings will be built and no details on how and who will be responsible for the maintenance and costs of maintenance of these crossings. On page 34 under "*Changes in WSCT food supply will be mitigated by:*" it says: "*Develop a progressive reclamation plan to accelerate revegetation, reforestation and end land uses...*" Again, there are no details about this progressive reclamation plan given.

On Page 181, it mentions *“the predicted Project-related implementation of a Fisheries Offsetting Plan...”* When will this Plan be put in place? We believe it should be started prior to any construction.

On Page 200, it says: *“Benga will have several years to resolve the situation through operational adjustments to the SBZ or to implement another contingency plan to prevent unacceptably high selenium levels in Blairmore Creek.”* We have concerns with this statement, because to us it means - we'll figure out how to fix this when we already have the problem. The selenium level problem hasn't been solved adequately to date. On Page 218, Benga's response is that: *“Teck (2019 Implementation Plan) indicate that they are continuing to conduct research and development to confirm that their SRFs are performing to set targets and will ultimately be proposed to provincial and federal governments in 2020 as an alternative means of selenium Management...”*

On Page 251, it says, *“Bull Trout ... classified as “Threatened”*. Except for noting the Bull Trout's presence in the Oldman Reservoir, there is no mention of Bull Trout in either the March 2020 Addendums or August 2019 Addendums. It is not just the West Slope Cut Throat Trout that is affected, there are other aquatic species (ex. Bull Trout).

We are concerned about the reasons why Riversdale Resources is applying for a mining permit in the area. According to the worldometer link, <https://www.worldometers.info/coal/coal-reserves-by-country/>, Australia has 14.01% of the world's coal supply equivalent to over a 1000 years at their production rate, while Canada only has 0.6% of the world's coal supply which is a little over a 100 year's supply. Why are Riversdale and two other Australian companies so determined to operate here?

Yours truly,

Victor and Barbara Koch