

June 27, 2011

Rachel Shaw
Project Assessment Manager
BC Environmental Assessment Office
PO Box 9426 Stn Prov Govt,
Victoria BC V8W 9V1

Dear Ms. Shaw:

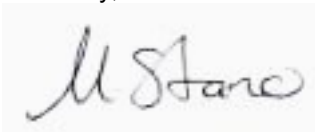
I have reviewed the Raven Underground Coal Project Draft Application Information Requirements / Environmental Impact Statement Guidelines Version 7.0, May 2011 (the "Draft AIR") and offer the following comments on this document.

- Section 2.2.1: The Draft AIR states that the "*need for*" and "*purpose of*" the project will be established from the perspective of the proponent. However, this is an important point on which to take into account the public's comments – therefore, the public perspective, as provided in the public comments, should also be included in this discussion.
- Section 2.5: The section on alternatives assessment does not indicate how alternatives will be identified. Alternatives should be identified based on a technical analysis, but also based on comments submitted by the public. Although the Draft AIR states that "*The Application / EIS will describe how public and Aboriginal groups' feedback on alternatives was incorporated throughout the EA process and into the mine design process*" there is no mention on how the public's comments will be taken into account in actually identifying alternatives – not just commenting on those alternatives identified by the proponent. The public, through local knowledge, will likely be able to offer important alternatives that should be considered by the proponent in its Application/EIS.
- Section 2.7: Labour force requirements should also be identified for the decommissioning and closure stage. In addition, the breakdown of local, provincial, national and international hiring should also include a description of associated wage categories for each of these categories.
- Section 3.3: I would like to highlight the importance of adequate consultation with Aboriginal groups and First Nations, particularly on the determination of the "significance" of adverse effects. The "significance" of adverse effects must take into account the Aboriginal and local community's perspective.
- Section 4.2.2.2: The table mentioned in this section is important for the public to review – it should therefore be included in the Executive Summary of the Application / EIS, rather than only being buried deep in the Application / EIS document.
- Section 4.2.3: Same as above – the table mentioned in this section should be included in the Executive Summary for ease of public review.

- Section 4.2.4: What area around the proposed project will be considered in the cumulative effects assessment? There is mention of the “*same area*” – please define the distance from the proposed mine that this would include (i.e., 5 km radius, 10 km radius, etc.)
- Section 5.3.2.1: The number of groundwater wells installed to date for the hydrogeological characterization appears to be inadequate – it is recommended that a thorough groundwater well drilling and sampling program (with sufficient wells and data collected over 2 years to characterize baseline conditions) be carried out to adequately map the local aquifers. In addition, water quality surveys should be completed during low, medium and high flow periods – not only during low flow periods. All aquifer mapping data collected should promptly be made publicly available.
- Section 22.12: The discussion of significance of effects is perhaps one of the most important discussions in the Application / EIS. Rather than merely being discussed in different sections of this report, this discussion must be highlighted in adequate depth in the Executive Summary for ease of public review.
- Section 22.19: The results of the follow-up program must be made publicly available and the method of doing so must be included in the Application / EIS. In addition, adaptive management must be integral part of the follow-up program, and not merely be used “*where applicable*”.
- Section 22.20: Renewable resources must also include surface and ground waters.
- Appendix B: Significance rating must take into account the local community’s and Aboriginal people’s perspectives.

In addition to the above-mentioned deficiencies, there is an inadequate discussion on the potential climate change impacts both on the project, and that would be caused by the proposed project. These must be adequately discussed and considered in the Application / EIS. The ML/ARD program is also not sufficiently covered.

Sincerely,

A handwritten signature in cursive script, appearing to read 'M Stano', is written in black ink on a light-colored rectangular background.

Maya Stano, P.Eng., JD.