



Alberta Wilderness Association
Cardinal Divide – Mountain Park Campaign
and the Cheviot Mine Proposal

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Compiled by: Wendy Adams, Vice President
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Table of Contents

Table of Contents 2

Introduction 3

 Key Points About the Proposed Cheviot Project..... 3

The History of the Cardinal River Coal Proposed Cheviot Project..... 4

 The Environmental Assessment..... 4

 The Court Action 5

Opposition to the Cheviot Project Grows 6

 Scientists Oppose the Cheviot Project..... 6

 UNESCO World Heritage Committee Questions the Cheviot Project 7

Ecology of the Cardinal Divide- Mountain Park Region 9

 Outstanding Features..... 9

AWA's Proposed Mountain Wildlands Park 11

Solution: Alternatives to the Cheviot Open Pit Mine..... 12

 The Setting 12

 Alternatives for the Public (the owners of the coal reserves, lands and wildlife) 12

 Alternatives for Cardinal River Coals joint venture company (CRC)..... 13

Introduction

Key Points About the Cardinal Divide – Mountain Park Campaign and the Proposed Cheviot Mine Project

The Alberta Wilderness Association proposes the Mountain Wildlands Park for an environmentally significant mountain region adjacent to Jasper National Park, along the Cardinal Divide. The area has been designated by the provincial government as a Critical Wildlife Habitat zone. The region is mountainous land with greater than 6000 ft elevation (1.829 km). Part of the charm for visitors is the abandoned hamlet of Mountain Park, home of Alberta's first mining village until the underground mine closed. The lands are considered sacred to both First Nations and former residents.

In March 1996, Cardinal River Coals proposed the Cheviot Mine Project for this same region. The Critical Wildlife Habitat zone allows for mining but only if the environmental integrity of the area can be maintained. Cardinal River Coals own consultant, Dr. Stephen Herrero, stated at the hearings that the mine would destroy the ecological integrity of the area. This has ramifications for vulnerable populations of ungulates, carnivores (such as grizzly bear) and Harlequin Ducks (which have been experiencing declines through western Canada and the US).

The mine will disrupt most of the drainages within the project area, key nesting and brooding areas for Harlequin Ducks.

Cardinal River Coals refuses to provide any reclamation plan -- they insist it is not required at this stage. They also refuse to provide any real economic analysis emphasizing the virtues of the mine for short-term jobs.

The area is classified as being of national environmental significance. There are few areas on the east slopes of the Rockies that have such extensive alpine and high subalpine meadows combined with important wildlife habitat, old growth forests and productive riparian systems.

Consolidated Coal, one of the owners of Cardinal River Coals, has an environmental record that is of concern. All directors were required to pay a \$200,000 fine in 1994 for failing to reclaim a mine in New Mexico. There is a raft of allegations, convictions and poor practices that are outlined in press clippings and court documents.

The History of the Cardinal River Coal Proposed Cheviot Project

In March, 1996 Cardinal River Coals (CRC) started taking steps toward opening a large coal mine in the Cardinal Divide, just outside of Jasper National Park. The proposed mine would include 26 massive pits, several of which would eventually fill with water. The mine would span 23 km, leaving valleys and streams filled with tons of waste rock. These streams are located at the continental divide between the Arctic and Atlantic oceans.

In response to CRC's mine site application, an alliance of conservation organizations formed. They embarked on what has turned into a long and frustrating battle to keep the Cardinal Divide wildland and stop the mine at that location.

The Environmental Assessment

In January and February of 1997 the first ever joint federal/provincial Environmental Assessment Panel assembled in Hinton to consider the environmental issues which would arise from the proposed mine and to decide whether it should proceed. The panel review did not address alternatives and cumulative effects as required by the Canadian Environmental Assessment Act. As the review continued, other short comings became apparent to the environmental organizations participating in the process.

The independent mine engineer contracted by the Review Panel provided evidence that the proposed Cheviot Mine is in a poor competitive position (due to the extent of the Rocky Mountain landscape that they plan to dig up to get to the coal), when compared with the rest of the coking coal mines in Western Canada, let alone when compared to Australia which is Western Canada's main competitor.

CRC admitted that they could not predict the coal market beyond three years of the planned beginning of coal production at the new Cheviot mine (i.e. not beyond year 2003).

There was no independent assessment of alternatives. It was within the jurisdiction and resources of the Review Panel to have such an assessment done.

There are alternatives for employment of CRC employees in the same basic type of work, should CRC not get Cheviot or another mine underway. There are alternatives for coal production in the region, and there are even alternatives for CRC and its parent companies.

CRC's assessment of alternatives was cursory. Alternatives were not reassessed (e.g. exploration drilling) once the Cheviot site was upgraded from Multiple Use to a Critical Wildlife zone by Alberta. The limited assessment that was done was geared solely to a single, long-term mine of 20 or so years duration, even though it is now known by the company that the coal markets cannot be predicted beyond 2003.

By June the Panel had issued a report recommending federal approval of the mine. On October 2, 1997 the federal government accepted the review panel's recommendations.

On February 6, 1998 the alliance, including the Alberta Wilderness Association, Canadian Nature Federation, Canadian Parks and Wilderness Society, Jasper Environmental Association, and the Pembina Institute for Appropriate Development, launched a lawsuit against the panel and federal government. Represented by the Sierra Legal Defence Fund, the alliance applied for judicial review to the Federal Court of Canada, asking that the panel's environment assessment be set aside and sent back for reconsideration, and that the federal approval be withheld pending the completion of an adequate environmental assessment. In particular, that the panel properly assess:

- the effects of the project in combination with other projects in the area (i.e. cumulative effects);
- the mitigation plans aimed at reducing the project's environmental damage;
- the need for the project;
- the alternatives to the open-pit mine and the environmental effects of those alternatives; and
- the project's effects on sustainable development.

The Court Action

The alliance was disappointed in its first court appearance, June 1998, as their case was dismissed on a technicality. The alliance appealed the court decision. At this point a panel of three judges was convened and the environmentalists got their first taste of victory. On December 1, 1998 the Federal Court of Appeal saw fit to overturn the June ruling. As well, the judges awarded the alliance costs and overturned an earlier procedural decision which had excluded important information regarding cumulative impact of the mine. As a result of this a new Federal Court hearing was set for the spring of 1999.

On March 1, 1999 the case was heard in Edmonton by Justice Douglas Campbell. Justice Campbell ruled in favor of the alliance and removed the federal approval for the mine. He declared that the matter be sent back to an Environmental Assessment Panel to complete the review.

Although considered a strong victory for the Cardinal Divide, the fight is far from over. It is hoped the review panel will preside with competence this time and ensure that all relevant information on alternatives, cumulative effects and public need for the mine is gathered and considered.

The joint federal-provincial review of the proposed Cheviot open-pit coal mine near Jasper National Park re-opened September 9, 1999 with a pre-hearing meeting in Hinton. At the meeting, the alliance presented their recommendations for properly completing the review of the mine application. Their main concerns were whether the public can have any confidence that the option of not building the mine at the Cheviot location will be fairly considered by the Panel, given that Board members of Alberta's Energy and Utilities Board (EUB) are two of the three member Panel and the EUB has done nothing formally to revoke or suspend the permit they issued for the mine.

The alliance also requested that the Panel have independent studies done, rather than leaving it to the CRC to present information on environmental impact and economic assessment. The Panel agreed, and the hearing date is scheduled to begin March 3, 2000 in Hinton, Alberta.

Opposition to the Cheviot Project Grows

Scientists Oppose the Cheviot Project

A group of scientists issued a joint statement opposing the Cheviot Mine and calling for protection of the Cardinal Divide area, where the mine is proposed. The group includes world renowned scientist Dr. David Schindler, Killam Professor of Ecology at the University of Alberta.

The statement cites expert testimony about the region documenting it as a Natural Area of Canadian Significance for its wildlife values including grizzly and other carnivores, song birds, fish, and rare plants. The scientists also support the arguments put forward by environmental groups who have taken legal action challenging the adequacy of the environmental review of the mine.

“The review process was flawed with respect to assessment of cumulative effects,” said Dr. Schindler. “For example, the Federal Department of Fisheries and Oceans advised the Review Panel that adequate assessment had not been done on the cumulative effects of the mine on the region with respect to other developments and of introducing mine pit lakes into the headwaters of various watersheds.” Seven mine pit lakes are propose as fisheries compensation in replacement for stream fisheries.

According to the position statement, expert testimony at the joint federal and provincial hearings concluded that the mine “clearly threatens the ecological integrity of Jasper National Park...which Canada has committed to protecting the ecological integrity of.” It states that the protection of the Cheviot area falls directly under Canada’s commitment to the “Network of Protected Areas” and the “Canadian Biodiversity Strategy,” which emerged as part of the United Nations Convention on Biological Diversity.

The scientists call upon the governments of Alberta and Canada to reject the application for the open-pit coal mine at the Cardinal Divide - Mountain Park location, and to instead apply the principles of the Canadian Biodiversity Strategy and the Statement of Commitment to Complete Canada’s Network of Protected Areas, as well as the findings of the Environmentally Significant Areas Assessments, by proceeding with formal protection of the entire area of the proposed Cheviot Project.

Signatories:

David Schindler, D. Phil., D.Sc., FRSC, Killam Professor of Ecology
Suzanne Bayley, Ph. D., Associate Prof., Biological Sciences
Dale Vitt, Ph. D., Professor, Dept. of Biological Sciences
John Packer, Professor Emeritus, Dept of Biological Sciences
Vince St. Louis, Ph. D., Assistant Prof., Biological Sciences
Jackie Huvane, Ph. D., Research Associate, Biological Sciences
Jules Blais, Ph. D., Research Associate, Biological Sciences
Jim Butler, Department of Forest Sciences
John Terborgh, James B. Duke Professor, Duke University
Frank Wilhelm, M. Sc., Grd. St., Biological Sciences
Michelle Bowman, M. Sc., Grd. St., Biological Sciences
Maggie Xenopoulos, M. Sc., Grd. St., Biological Sciences
Bill Donahue, B. Sc., Grd. St., Biological Sciences
John Clare, B. Sc., Grd. St., Biological Sciences
David Kelly, B. Sc., Grd. St., Biological Sciences

UNESCO World Heritage Committee Questions the Cheviot Project

The World Heritage Committee expressed concerns to Canada over a large open-pit coal mine (23 km by 3.5 km) to be excavated adjacent to Jasper National Park, a World Heritage Site. In a letter sent to Canada's Ambassador to UNESCO, the Director of UNESCO's World Heritage Centre wrote,

"the Committee expressed its serious concerns regarding the impacts that the proposed mining project would have on the integrity of the Canadian Rocky Mountain National Parks and invites your Government to consult with the Provincial Government of Alberta and to re-consider the decision on the proposed mining project with a view to seeking alternative sites in the region which would have less damaging effects."

The World Heritage Committee requested that the Canadian Government provide it with detailed information about the expected impacts on the World Heritage Site and measures it proposes to mitigate these impacts. The Director also asked for information on the outcome of any discussions between the federal government and Alberta to identify alternative site(s) for the mining project.

The Government of Canada prepared an official response to UNESCO's request. Following its release, the alliance of conservation organizations opposed to the Cheviot Project found many short comings in the government's report. These are outlined below.

Alternative Mine Site

The Government of Canada was invited to reconsider its approval of the mine and consult with the provincial government of Alberta with a view to seeking alternative mine sites. No response to this request was made in the report. The alliance found no indication that discussions were held regarding alternative mine sites.

Alternatives exist within the region, including for the parent companies of this proposed mine. As of 1990, the applicant had planned a mine further east from the World Heritage Site in lands already zoned for multiple resource use; as opposed to the Cheviot site which is in lands zoned by the Government of Alberta as Critical Wildlife - "crucial to the maintenance of specific fish and wildlife populations."

Detailed Project Information

In providing this summary description, the Government of Canada made several factual errors. The permit area issued by the Government of Alberta for the mine development is 7,106 hectares in addition to the approximately 12 kilometer long corridor in which the railroad and all-weather industrial road would be built to the mine. There is a preponderance of rare, disjunct and threatened species in the proposed mine area. It is habitat for 27 species of mammals and birds listed as being in trouble in Alberta, a threatened trout, and plants from 15 provincially and 3 nationally significant populations. The "stringent conditions to protect the environment" referred to in the response have yet to be developed. The Cheviot Mine development was given an approval prior to these conditions being formulated.

At the turn of the century, an underground mine was opened at Mountain Park within the proposed Cheviot Mine area. It left a total disturbance area of 70 hectares. "Less than 1 per cent [of the proposed Cheviot mine permit area] was classified as disturbed." (Review Panel Report, p. 59)

The Cardinal River Divide is not the height of land between Jasper National Park and the mine permit area. It is perpendicular to the park boundary, on the south side of the proposed mine. The height of land forming the park boundary is the Miette Range and its associated passes. The Cardinal Divide Natural Area, as its name indicates, is primarily on the height of land forming the

Cardinal River Divide. It does include the peak of Prospect Mountain which is part of the Miette Range; the lower slopes of which remain in the mine permit area.

Expected Impacts on the Jasper World Heritage Site

The Government of Canada's response addressed potential impacts on only one species, grizzly bears, even though the proposed mine area is zoned as Critical Wildlife habitat for more than one species using provincial habitat and Jasper National Park habitat as an ecological unit (e.g. wolverines, wolves, mountain lions, elk). It did not provide information on the other foreseen impacts, including: the wilderness quality and ecological integrity of the World Heritage Site as already outlined by Parks Canada and Environment Canada during the review process.

Parks Canada's concerns relate specifically to the loss or alienation of habitat; impacts on essential wildlife travel corridors which link Jasper National Park and the high-quality habitat in adjacent provincial lands; increases in wildlife mortality and the cumulative impacts on Jasper National Park of this project and other planned or proposed activities such as timber harvesting, access, oil and gas exploration." (Parks Canada, oral presentation to Review Panel).

Species such as the grizzly bear are quantifiable measures of ecological integrity and known as "indicator species" by which the impact of other species might be assessed. Parks Canada supports this approach, but we must remember that it works both ways." Given that the mine would have significant adverse effects on carnivores for at least a century (wolverines, grizzly bears, mountain lions and wolves), "[this] suggests a parallel situation for other species under the umbrella." (Parks Canada, oral presentation to Review Panel).

The Review Panel found regarding wolverines, grizzly bears, mountain lions and wolves and the proposed mine development that, "the areas outside of the park may also become even more of a mortality sink than currently occurs." (Review Panel Report, p. 86)

In its 1994 State of the Parks Report to Parliament, Parks Canada listed mining on lands outside Jasper National Park as a significant ecosystem stress. The source of this list notes that the two existing mines adjacent the park and to the north of the proposed Cheviot mine "are expanding into areas of critical wildlife habitat." Park officials observed that the impact of these mines was at the landscape scale, the anticipated recovery time was greater than one hundred years, was increasing, and was having such ecological impacts as species loss, habitat fragmentation and habitat loss.

Proposed Mitigation Measures

UNESCO asked the Government of Canada to propose measures for mitigating the environmental impacts on the world heritage site. The Government provided no substantial information. Their response indicated that only a draft agreement has been completed for development of a process for the regional management of one species – grizzly bears.

The proposed Cheviot mine engulfs the Critical Wildlife zoned lands within the even narrower remaining buffer adjacent Jasper National Park's east boundary. Lands to the north and east of this remnant buffer were zoned for multiple resource and industrial uses. Hence, they have already been extensively altered through coal mining, clear-cut logging, road development and petroleum industry activities.

No substantive information on mitigation measures is provided in the response because mitigation measures, if potentially feasible, have yet to be designed and assessed as to their potential effectiveness. In recommending approval of the mine development, the Review Panel took into account measures (such as monitoring or future study and planning) which do not qualify as mitigation as defined by the Canadian Environmental Assessment Act. Otherwise, the mitigation measures it took into account were so vague or uncertain that they could not provide any assurance that significant adverse effects would be reduced to insignificant.

To date, only a draft agreement has been completed for the development of a discussion process for the regional management of only one affected species, grizzly bears. The proposed Carnivore Compensation Program, is in itself only a process through which officials hope to arrive at mitigation measures. "...the Panel is concerned that CRC's Carnivore Compensation Program may not ultimately be adequate to mitigate regional impacts to carnivore populations." (Review Panel Report, p. 129).

The multi-stakeholder process proposed for grizzly bears is comparable in a broad sense to that which has been carried out for woodland caribou in Alberta; an IUCN listed vulnerable species and listed as endangered in Alberta. It has now been 25 years since wildlife biologists sounded the alarm over the dramatic decline of Alberta's woodland caribou. Today, there is no ecologically based recovery plan in place, all of their habitat outside of protected areas has been allocated to resource development, including clear-cut logging.

Ecology of the Cardinal Divide- Mountain Park Region

Outstanding Features

A very rich human history including areas significant to paleontologists and archeologists. An ancient unbroken chain of aboriginal use of medicinal plants, the site of one of Alberta's first and certainly its most remote mining villages (a turn-of-the century underground mine), and lands sacred to both First Nations and the former residents of Mountain Park.

A very rich natural history; a "hot spot" of biological diversity, including several disjunct, rare and threatened species, as well as a previously unrecorded species. There is a high potential for the discovery of new or rare species, particularly plants, insects and aquatic life.

One of the most extensive complexes of alpine and subalpine habitats found in the front ranges of the Rocky Mountains.

As a refugium - an area that was unglaciated during the last ice age - it contains several disjunct species (individuals far removed from their main populations), such as species of mosses that are only otherwise found in the Canadian Arctic. Visitors to the area today are hiking amongst the direct descendants of plants and insects that were there at least 11,000 years ago and possibly as far back as 128,000 years.

A species richness and diversity of song birds "as high as it gets in North America." Home to 4,000 to 5,000 song birds, including birds from 32 species whose populations are declining in North America.

Home to mammals and birds of 27 species listed as being in trouble in Alberta including those that require old-growth forests or untouched mountain steams. This includes the second largest known breeding population of Harlequin ducks, as well as grizzly bears, wolverines and northern long-eared bats which are all listed as threatened species.

One of the longest caves in Alberta. One of only four known bat hibernacula and the only known bat swarming site in Alberta.

Plants from at least 37 provincially significant and 3 nationally significant populations, as well as rare plant communities, such as a type of Engelmann spruce-subalpine fir old-growth forest and a White Dryad-Kobresia alpine plant community.

Habitat for bull trout which are regarded as endangered in Alberta.

The continental divide between the waters flowing to the Arctic and Atlantic Oceans.

Geologically significant, with calcareous and sulfur springs, a unique vegetated rock glacier and an abundance of periglacial features including patterned ground.

AWA's Proposed Mountain Wildlands Park

A park boundary including 641 sq. km. (247 sq. miles) in size; the vast majority of which is high elevation, mountainous land over 6,000 feet in elevation.

Covers 8% of the 8,400 sq. km Coal Branch land-use planning area; 84 % of which has already been allocated to mining, logging, oil and gas activity, and other resource development or industrial use.

Is of national significance; having a complex of natural features not found elsewhere in Canada and outstanding cultural and historical features.

Encompasses the Cadomin Caves Protective Notation, the Cardinal Divide Natural Area and four associated Protective Notations (all put in place by the province) thereby formalizing the legal protection of these lands.

Encompasses lands zoned by the Alberta Government as Prime Protection and Critical Wildlife. Prime Protection zoned lands, being mountain peaks and alpine landscapes, are the most environmentally sensitive of the Rocky Mountains and are by policy, off limits to industrial development. Critical Wildlife zoned lands are defined as crucial to the maintenance of specific fish and wildlife populations.

Includes lands recommended by the federal/provincial Review Panel for closure to off-road vehicle use in order to protect wildlife habitat and wildlife movement (headwaters of the Cardinal River), and includes the area withdrawn from the proposed coal mine (the alpine area in upper Prospect Creek).

A key factor for protecting the wilderness and ecological integrity of Jasper National Park. Includes critical wildlife habitat for animals which are also found in the national park part of year. Would protect wildlife movement between Jasper Park and needed habitat outside of it. Would protect the adjacent wilderness of the national park from further incursions by the sight and sound of industrial development. Will provide protection for wildlife movement north and south along the front ranges of the Rocky Mountains, as well as in and out of Jasper Park.

Will provide protection of the wildlife habitat identified in provincial plans as being needed for the recovery of grizzly bears and other carnivores, as well as bull trout.

Includes the Red Cap Mountain bighorn sheep refuge and thusly, would provide legal protection for this habitat.

Solution: Alternatives to the Cheviot Open Pit Mine

The Setting

The area of the proposed Cheviot Mine (Cardinal Divide/Mountain Park) is not the last deposit of metallurgic or "coking" coal in the Hinton region, let alone in Alberta and Western Canada.

Alberta's Coal Policy and Coal Conservation Act were supposed to protect the public from companies digging up valuable public lands only to take out the coal cheapest to reach and then abandon the rest to move onto a whole new area to dig up.

Alternatives for the Public (the owners of the coal reserves, lands and wildlife)

1. Development of other coal reserves in the Hinton region.

Within the Hinton region, there are mines currently planning on extending their operations or expanding. CRC's expert estimated 100 new mining jobs at one of these, the Obed Mine. The other's noted at the hearing are the Gregg River mine, and the McLeod River and Mercoal properties. Since then, Luscar, one of CRC's parent companies, has also announced an extension of their Coal Valley Mine.

Alberta's regional land-use plan indicated that six Approvals in Principle have been given by the government for new coal mines in the region (including the Cheviot and East Cadomin mines), but refused to provide the hearing with information on each of the other five. In addition to this, the McLeod River and Mercoal mines have permits and could proceed at any time.

During the hearing, it was clear that Manalta Coal Ltd., which was operating an open-pit mine (Gregg River Mine) immediately adjacent CRC's Luscar Mine, was exploring to expand their mining operation.

2. Economic development and employment alternatives for the Hinton region.

Alberta's regional land-use plan (Coal Branch Integrated Resource Plan) recommends diversifying away from the region's dependency on non-renewable resource extraction (coal, and oil and gas).

The regional land-use plan identifies tourism as the sector for diversification, and highlights features that would be destroyed by the Cheviot Mine as the key tourism assets (Cardinal Divide, Mountain Park, etc.).

At the pre-hearing, CRC testified that there will be a strong job market for the workers at the time the Cheviot Mine would open. They stated they did not want to lose their skilled workers to these other job opportunities, and thus, did not want any delay in approval for the mine.

3. Development of other coal reserves in the Eastern Slopes of Alberta.

Metallurgic or "coking" coal reserves also exists elsewhere in the Rocky Mountains of Alberta, e.g. the open-pit mine abandoned by CRC's parent company Consolidation Coal at Grassy Mountain in southwest Alberta. This type of coal also exists in B.C.

With a number of these reserves, open-pit mining only extracts the tip of the coal seams, leaving most of the coal underground (known as "stranding"). Smoky River Coal to the north of Hinton still operates an underground mine which extracts coal that cannot be taken out with open-pit mining methods. However, they only mine the relatively level seams. No Western Canadian mines are developing underground mining technology for mining the much more extensive steeper seams, as is occurring elsewhere in the world.

4. Development of other coal reserves in Western Canada.

There are a number of mines/companies in Western Canada, whose contracts with Japan all expired between March 1998 and March 1999 (all are major coking coal suppliers); Teck, Fording Coal, Cardinal River Coals, Manalta Coal, Quintette, Bull Moose, Eagle, Luscar, Elk View, Gregg River and Line Creek.

Alternatives for Cardinal River Coals joint venture company (CRC)

1. Further development of CRC's current reserves.

At CRC's present Luscar Mine located to the north of the proposed Cheviot Mine: there is 9.5 million raw short-tons of coal available by conventional underground mining, providing approximately 3.5 years of coal (as per CRC's application). There is a hydraulic underground mine which they are not currently operating. It has a further amount of underground coal reserves not reported in their application.

CRC's application said that they would switch to underground mining at Cheviot once coal reachable by the open-pit method is mined out, so coal reserves would not be "stranded." Why are they then proposing to strand coal reserves at Luscar and East Cadomin by moving onto a new mine at Cheviot, before mining out these other areas closer to their plant?

CRC's parent company, Consolidation Coal, primarily mines by underground methods in its US mines and this parent company is providing the expertise for the Cheviot coal plant. Therefore, why is it not providing underground mining expertise for Luscar and East Cadomin?

CRC's East Cadomin Lease also has government Approval in Principle for a mine. It is located in a Multiple Use land-use zone, unlike the proposed Cheviot site which is designated a Critical Wildlife Zone.

East Cadomin is so close to the current Luscar Mine that CRC could use their Luscar coal plant and rail line. Building a new coal plant and infrastructure (which is the most expensive part of mining) at Cheviot would "strand" coal reserves at East Cadomin, as it would be a 15 km haul up hill to Cheviot rendering the economics such that CRC likely would not mine the reserves at East Cadomin if they develop the Cheviot Mine.

1990, CRC did detailed drilling and planned the pit lay-out and sequencing for the East Cadomin mine, then later abandoned these mine plans. They would not give specific evidence as to why, other than saying it was an economic decision; the residents of Cadomin would not like it (although it would be further away than their present Luscar mine pit above town to the northwest); and they don't have a permit so they would have to go through the same process now going through for Cheviot.

CRC is currently mining a pit right above the hamlet of Cadomin to the northwest. Their East Cadomin lease begins roughly 2 kms to the southeast of Cadomin.

East Cadomin has 6 million tons available by surface mining and a further estimated 57.8 raw tons available by underground mining (CRC did no further assessment of underground reserves after their 1985 Approval in Principle for this mine).

CRC could begin with open-pit mining at East Cadomin giving them 2 years of open-pit mineable coal based on their own estimates. This would permit enough time to plan and open underground mining at Luscar, plus reopen the hydraulic mine giving more than 3.5 years of coal there, then onto underground mining at East Cadomin.

CRC said that they had no plans at this time to mine underground coal reserves at their Luscar mine and the reserves at their East Cadomin lease, but that they would hold onto these coal

reserves. They did agree that there would be 5.5 years worth of coal with the Luscar underground and the East Cadomin surface mineable reserves.

This is the most prudent approach from the public's perspective, both in not stranding coal reserves at Luscar and East Cadomin, and in not destroying the Cardinal Divide/Mountain Park area to only find out that the markets are no longer there for the Cheviot mine; a mine already estimated to be in a poor competitive position when compared to other coking coal mines in Western Canada.

2. Development of other leases held by CRC and/or the parent companies (Luscar, Consol).

Luscar and Consolidation Coal are the parent companies of CRC. Luscar operates seven mines in Western Canada (thermal and coking coal) and Consolidation Coal (Consol) is the largest mining company in the US (primarily underground mines).

Of the type of coal CRC plans to mine at Cheviot (metallurgic coal), CRC or its parent companies have coal leases at Brule (in the Multiple Use Zone of the Hinton region), Crowsnest Pass (including an open-pit mine they abandoned at Grassy Mountain) in southern Alberta, and Nordegg/Ram River of Alberta's Rocky Mountains.

Despite Consolidation Coal being a huge underground mining company, they did not assess underground reserves at any of their (CRC, Luscar, CONSOL) leases in the Hinton region, except at their present Luscar mine.

4. Underground mine at Cheviot instead of open-pit

Environmental impacts associated with this alternative remain high. Underground mining at Cheviot is the least preferable alternative. The project would still require infrastructure (including a road, railroad, and a coal processing plant), and would lead to the stranding of coal reserves at the Luscar and East Cadomin mine sites.