



December 19, 2018

Honourable George Heyman
Minister of Environment
Victoria, B.C.

By Email – ENV.minister@gov.bc.ca

Dear Minister Heyman:

What Matters in Our Valley is a newly formed group of Bulkley Valley residents who are concerned by the publicly announced plans by Allegiance Coal to begin coal mining operations near Telkwa, B.C.

We are contacting you in order to request that any such application submitted by Allegiance Coal be subjected to a full Environmental Review by your Ministry.

As you may know, Allegiance is intending to file an application sometime in 2018 to permit the project to go forward. It is characterized as a fast track application. Allegiance states in its “Market Update” of January 18, 2017 (attached – p. 3) that its initial plans are to limit mining to 240,000 tons per year which would place it just below the 250,000tpa threshold that would trigger a full assessment under the Environmental Assessment Act. Yet, in the same document, Allegiance states that it plans to increase production to about 1.5 million tons per year. Also, Allegiance has cited the total reserve in the Telkwa Coal deposit as amounting to 165,562,000 metric tons (see Investor Presentation of October 2016 – attached, p. 7). Clearly, the proponent’s aims are to mine far more than 240,000tpa.

As we are sure you can appreciate, the proposal raises substantial concerns among area residents. In case you are not aware of the long and controversial history of similar proposals to mine coal in this area, we have provided a chronology of the events dating back to 1982 when the first modern proposal to re-open the Telkwa coal mining area was raised.

In addition, as you are probably also aware, the location of the proposed mining project is a highly sensitive one lying as it does near the confluence of the Telkwa and Bulkley Rivers with their important

runs of salmon and steelhead. Allegiance claims that the project concerns so-called metallurgical coal although most of the deposit contains coal that is inappropriate for metallurgical purposes, which requires cleaning at the mine location. Such cleaning produces huge amounts of waste water which will include acid rock drainage and other materials toxic to fish.

Moreover, the project lies wholly or mostly within the recently established Telkwa Mountains Caribou Wildlife Habitat Area (see Application for exploration permits – attached, p. 2). This area was recently designated in order to protect the threatened Telkwa Mountains caribou herd which is expressly listed under the Species at Risk Act which requires Provincial efforts to preserve habitat to ensure that the herd can be saved from extinction.

The proposal also raises serious traffic and air pollution concerns for residents of the Village of Telkwa. Coal will have to be trucked from the open pit mines that are contemplated by the proposal to a rail siding that lies on the other side of the main Telkwa residential area. Access is by a logging road that passes directly through the centre of Telkwa.

The proposal also lies within the unceded territory of the Witsuwit'en people. We know that the Wet'suwet'en are conducting their own process to determine whether this is a project that they can accept, but we believe that their deliberations will be greatly aided by an adequate environmental review by the Province.

Under these circumstances, we are concerned that the proponents intend to avoid a full environmental assessment before starting operations through artificially minimizing the size of the full scope of their project. The Environmental Assessment Act, Part 2, Sec. 6(1) allows the Minister of the Environment to require a full assessment even when the proposed mining project falls below the 250,000tpa threshold. Given the history and sensitivity of this area and the environmental risks associated with this project, we believe that the proposal meets all of the criteria necessary to require a full assessment even if the proponent's 240,000tpa estimate were to be taken at face value.

We would like to know what next steps should be taken in order to have the project designated for environmental assessment under the Environmental Assessment Act and would like to meet with you to discuss these issues further.

Yours sincerely,



What Matters in Our Valley

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cc Minister Doug Donaldson