

## **Comments on the dAIR for the Raven Underground Coal Project**

### **Issues Regarding Birds**

#### **Marine Environment**

The most notable omission in the dAIR regarding birds is the omission of any reference to birds in Baynes Sound. Baynes Sound is recognised in the dAIR as a Marine RSA (Figure 5.6-1), but no bird species are listed as VCs in that area (Table 5.6-1). Baynes Sound is recognised as an Important Bird Area (IBA) based on international criteria ([www.ibacanada.ca](http://www.ibacanada.ca)) and supports internationally important populations of waterbirds. In addition, several species of Provincial conservation concern (Blue-listed) are found in Baynes Sound. The Detailed Marine Baseline (5.6.2.1) needs to be expanded to include both the international important waterbirds and the blue-listed species as VCs and a plan developed to identify potential direct and indirect effects on them from the proposed development. To do this effectively, the Baynes Sound RSA (5.6.1.1) needs to be extended to reflect the normal movements of the populations of waterbirds. The temporal boundaries (5.6.1.2) should also be extended to cover a reasonable period after decommissioning the proposed development site.

#### **Terrestrial Environment**

Although the dAIR states that it includes “rare and listed species” (5.8.2.1), several species of birds so listed are omitted as VCs (Table 5.8-1) although they are found within the Terrestrial RSA. Those species should be included as VCs. The temporal boundaries (5.8.1.2) should also be extended to cover a reasonable period after decommissioning the proposed development site; 1-2 years is insufficient to evaluate the response of birds to decommissioning and revegetation (Table 2.2-1).

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