

**Norine Messer - Port Alberni, British Columbia**

Please see the attached document as the Alberni Environmental Coalition's final submission for the comment period around Version 7 or the d'AIR for the Raven Underground Coal Project. This submission focuses on the AEC's well-informed opposition to the Raven Underground Mine and the establishment of Port Alberni as a coal port. This submission is based on the comments made by our experts, as well as research reviews and a survey done by AEC members.

The AEC members and the experts hired through CEAA Participant Funding have put much time, effort and resources into a review of the documents released around this project. We trust that the information and recommendations provided in our 7 submissions will be given the same consideration.

Please contact us if you have any questions, or if you require any assistance finding references cited in any of the AEC Submissions.

Comments on the Proposed Coal Port as Outlined in the the draft AIR  
for the Proposed Raven Underground Coal Mine

Presented by the  
Alberni Environmental Coalition

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### **The Mine:**

*“Sustainable development means development that meets the needs of the present without compromising the ability of future generations to meet their own needs.” - Auditor General Act, Canada*

The Alberni Environmental Coalition (AEC) will start this submission by stating opposition to the Raven Coal Mine. It is obvious from comments made at the three recent public meetings, as well as from on-line submissions that there is great concern and opposition to this mine. The enormous environmental impact of the proposed mine site is unacceptable. Among the most serious concerns that has been identified is a potential for acid mine drainage from exposed and waste rock during the mining process. Toxic effluent leached from rocks can include arsenic, cadmium, chromium, copper, lead, mercury, selenium and zinc.

The people of Vancouver Island and surrounding Islands do not want this project to proceed. It goes against peoples' vision for the Island. This proposed mine threatens other thriving sectors of the economy such as tourism and shellfish aquaculture. This project also has the potential to impact health, food security and water quality. The dramatic negative effects of this proposed project on human health and well being far outweigh the benefits. This project should not be allowed to proceed.

*“Coal pollutants affect all major body organ systems and contribute to four of the five leading causes of mortality in the U. S.: heart disease, cancer, stroke, and chronic lower respiratory diseases. This conclusion emerges from our reassessment of the widely recognized health threats from coal. Each step of the coal lifecycle—mining, transportation, washing, combustion, and disposing of post- combustion wastes—impacts human health.”*  
- Physicians for Social Responsibility, Coal's Assault on Human Health, November, 2009.

### **The Coal Port:**

The proponent of proposed Raven Underground Coal Mine needs to research and select a different location for the overseas shipping of its coal product. As you can see from our previous submissions from our experts Joan Kuyek, Socio-economic, Bernadette Wyton, Air Quality and Tom Okey, Marine and Ecology, Port Alberni faces many unique environmental and social challenges that will be magnified if this project is allowed to proceed as proposed. Within the draft AIR and EIS Guidelines, Port Alberni is treated like an afterthought and given very little attention. In many cases Port Alberni and the Alberni Valley are not even identified as Local Study Areas. This illustrates that Compliance Energy and the Comox Joint Ventures have little regard for our community. It is obvious that Port Alberni residents are being treated like second-class citizens without proper consideration. The Alberni Environmental Coalition suggests that if this project is allowed to proceed an alternative shipping route must be established.

### **Rational:**

This project would inflict undo harm and hardship on Port Alberni and surrounding communities. The proposal to ship coal from an in-town location, with residential housing within 50 meters, is unacceptable and unheard of in Canada. Massive amounts of coal cannot be trucked and shipped right through the heart of our community, through long established residential and retail commercial neighbourhoods with no regard. Most Coal Ports (Westshore and Ridley) are not located in such close proximity to domestic residences.

The accumulated effects of commodities based economy in Port Alberni must be considered. This proposal cannot go forward without considering the human impact. Port Alberni is a very vulnerable community struggling to realize a vision of a future with a diverse and sustainable economy. This is seen as necessary for the health of our community. The following statistics for our electoral district illustrate this:

<b>BC STATS: 2009 Regional Socio Economic Index</b>		
	<b>Alberni/ Clayoquot Regional District</b>	<b>BC</b>
<b>Overall Socio Economic Index</b>	0.84	Ranked 3 <sup>rd</sup> Most Vulnerable Electoral District in BC
<b>Human Economic Hardship</b>	0.92	Ranked 3 <sup>rd</sup> Most Vulnerable Electoral District in BC
<b>Health</b>	0.99	Ranked 2 <sup>nd</sup> Most Vulnerable Electoral District in BC
<b>Education</b>	0.71	Ranked 6 <sup>th</sup> Most Vulnerable Electoral District in BC
<b>Children</b>	1.10	Ranked 2 <sup>nd</sup> most Vulnerable Electoral District in BC
<b>Youth</b>	1.05	Ranked 2 <sup>nd</sup> Most Vulnerable Electoral District in BC
<b>General Information Related to Electoral District</b>		
	<b>Regional District</b>	<b>BC</b>
<b>EI Recipients</b>	3.8%	2.8%
<b>Income Assistance Recipients (Children Under 19)</b>	7.8%	2.8%
<b>Income Assistance Recipients (Youth Age 19-24)</b>	6.5%	2.3%
<b>Income Assistance Recipients (Adults Age 19-65)</b>	4.3%	1.8%
<b>Children in Care</b>	29.9 per 1000	9.4
<b>Infant Mortality</b>	10.2 per 1000	4.2
<b>18 Year Olds Who Did Not Graduate</b>	42.5%	29.8%

\* As in 2010 Central West Coast Region Community Consultation, Coastal Family Resource Coalition

As you can see Port Alberni faces some serious social issues that must be looked at when considering the impact of the proposed project. The AEC suggests that the reality and stigma of having a coal port and coal-trucking route in the centre of the community would cause enormous and undo harm to Port Alberni and compound existing social issues with little to no gain.

At the Public meeting regarding Raven Underground Coal on June 2<sup>nd</sup>, AEC Participant Coordinator, Norine Messer was asked to submit the preliminary results of the door-to-door survey that we are doing as part of researching the Socio-economic impacts of this project. AEC members and other volunteers in the community have been doing a door-to-door survey asking residents if they are aware of the project and if they support or oppose the establishment of a coal port in Port Alberni. We have also set up booths in the community at public events that would draw a cross section of the community including the Family Fun Fair at the High School and the Saturday Market at the Harbour Quay. The survey is intentionally designed to be unbiased and volunteers are instructed not to give an opinion on the project. People for and against the project are encouraged to make comments. Thus far over 400 people have completed the survey.

Preliminary results indicate that 73% of those canvassed are opposed the proposal. Thirteen percent support the proposal and another 14% are undecided. Basically, the vast majority of community members oppose Port Alberni as the transportation route for Raven Coal. The survey asked if people were aware of the proposed project and then if they supported the project. People surveyed were also asked their top reason for being in support or opposition to the Raven underground Coal Project. Most people gave more than one reason.

Most people were aware of the proposed project. In order, the top reasons that people have given for opposing the project include:

1. Overall Environmental Impacts
2. Transportation concerns including increased traffic, hazards, safety and road maintenance and clogging up the only available transportation route in and out of Port Alberni.
3. Effects on Air Quality/ Coal Dust
4. Health Impacts on local residents
5. Not economically viable/ necessary/ sustainable for our community
6. Not enough jobs

7. Water Quality
8. Decline in Tourism
9. Does not fit with the community vision for Port Alberni
10. The project will limit economic opportunity for the community
11. Not an appropriate location
12. Decrease in Property Value

Most people who supported the project gave job creation as the reason for supporting the project and most who were undecided did not know enough about the project to have formed an opinion. Only 5% of those surveyed indicated that they would support the project if it were transported by rail. Of the 33 businesses separately surveyed thus far, 61% are opposed, 21% support the project and 18% are undecided. The vast majority of individuals and business oppose this project.

The draft AIR makes no reference to the accumulated effects of potential subsequent coal mining on Vancouver Island. If Port Alberni were to become the transshipment port it would be the route chosen for any shipment of coal mined on Vancouver Island. It only makes sense that any future coalmines would use this transportation route and storage/ shipping facilities once established. This must be looked at from an environmental and socio-economic perspective.

Compliance Coal Corporation's Bear and Anderson Lake holdings, as well as other possible coalmines owned by others who would potentially ship coal via Port Alberni must be considered. The accumulated effects of subsequent coalmines could make this a much bigger project for Port Alberni, with many millions of tons of coal shipped out of Port Alberni annually instead of 1 or 2 million. Our Socio-economic, Air Quality and Marine/ Ecology experts had very valid concerns about the social, environmental and health impacts of this project as proposed. What would the accumulated impacts of more mines be? What would this look like on existing transportation routes? What would this mean for Vancouver Island? What would this mean for the community of Port Alberni? Would the heart of our community be covered in black coal dust? Is this too much of a burden for Port Alberni and surrounding communities?

By changing the character of its shipments from lumber and logs to dirty coal, the Port Alberni Port Authority would be breaking its "Social License"

with the community of Port Alberni. Should this kick off a separate assessment?

Declines in local real estate values due to having a coal port in town may lead the Proponent and the Port Alberni Port Authority open to class action lawsuits from devalued property owners. Should the ability of these organizations to compensate citizens for damages be assessed and considered? Will residents be compensated?

Coal dust will be generated at this facility by coal haul trucks, accumulations from spillage, leakage, accidental discharge, technology failures, human error, and entrainment during transport from mine site etc. Coal dust will likely be carried into residential neighbourhoods by air movement. Off most concern is fine particulate matter. The obvious and documented air quality and health concerns from coal dust generated from hauling, unloading trucks and loading ships in a residential neighbourhood make the proposed trucking, storage and shipping route unacceptable.

The Raven Underground Coal Project is already causing many citizens of Port Alberni a great amount of stress and strain. The project is not necessary for our community. It goes against the vision and values of the community. For this reason alone, the "no means No" must be accepted as a legitimate expression that the public vision does not include a coal port. This should be recognized in the d'AIR, section 6 and 7. Individuals, businesses and organizations are working hard to create a more positive image and a brighter future for Port Alberni. For example the Rotary Club and countless volunteers are working to develop an Argyle Street Arts District that leads to the Harbour Quay. The proposed transportation route would have coal trucked right through the Arts District and right by the Harbour Quay a tourist area where the local Saturday Market happens weekly. This project cannot be allowed to proceed as proposed with no regard to such community initiatives and plans.

Known toxic bottom sediments would be disturbed by dredging or propeller wash from large vessels. Keeping them out of aquatic environment and food chain is imperative. Please see comments included in AEC submission #6 on this and other issues that may not have been covered by our experts' submissions.



The potential impact of natural disasters such as a tsunami and earthquake and/ or industrial accidents/ spills on the waters of Barkley Sound and the Alberni Inlet and on agricultural lands. The proposed mine and coal export terminal are to be located in an active earthquake zone, the proposed coal terminal will be in a known tsunami zone. Port Alberni has been hit by tsunamis in the past. Experts say that it is a matter of when, not if a tsunami will hit again, The Barkley Sound area coastline is known as the Graveyard of the Pacific. The threat of coal ships running aground is a real. These factors create a level of risk that makes the Raven proposal unacceptable.

What is the possibility of coal fire and explosion risk at storage and loading facility that will be so close to houses?

The Somas sockeye run is one of the strongest salmon runs left in British Columbia. These fish are considered to be the lifeblood of the Alberni Valley by many. Port Alberni was just voted Canada's Ultimate Fishing Town. The commercial and sport salmon fishery from local salmon runs provide jobs and value to the local economy. The importance of salmon to the local First Nation culture and their communities is beyond financial quantification. How will coal dispersed into the marine environment affect juvenile salmon when they are most vulnerable? The d'AIR and EISG make no mention of the Somas salmon run.

As you can see from the above considerations, storing and shipping coal out of the centre of Port Alberni is not an acceptable or viable option for the Raven Underground Coal Mine or for potential future coalmines. Another route must be chosen.

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