



Fanny Bay Salmonid Enhancement Society
8425 Berray Road, Fanny Bay, BC V0R 1W0
Phone/Fax 250-335-1575 / www.fbse.ca / fbse@uniserve.com

27 June 2011

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

Dear Rachel:

Re: Draft AIR/EIS Guidelines Document - Raven Underground Coal Mine Project

The Fanny Bay Salmonid Enhancement Society (FBSES) has been a registered non-profit Society since 1993. Dedicated volunteers have contributed tens of thousands of hours, particularly in the three main areas of: i) rebuilding the wild salmon populations in local streams, ii) restoration and enrichment of in-stream and riparian habitat, iii) actively monitoring the overall health of our watersheds. These are the pillars of the FBSES mandate.

The proposed coal mine operation which could affect the Cowie, Cougar Smith, Tumblewater, Apple Cherry, Emily, Hindoo, Wilfred and Tsable watersheds presents a number of potentially disturbing issues that pertain to the mandate of FBSES. This letter focuses on certain issues that we are urging the proponent to consider in their application for an Environmental Assessment Certificate. Our concerns are:

1. Water Quality and Quantity: (ref. Section 5.3.2)

Changes in water quality and quantity, whatever the cause, can have serious consequences to salmonid populations. At present, the dAIR/EIS Guidelines document does not provide sufficient information to define clearly how the monitoring of water quality and quantity will be carried out before, during and after the mining. Any monitoring data of all critical indicators in all locations should be made immediately available to the public on a website for shared watershed stewardship.

2. Project Study Area: (ref. Section 5.4)

The map shows the Raven Coal Property Tenure goes from the Wilfred Creek in the south to the Hindoo Creek in the north. This area lies within the mandate of the FBSES for the protection of salmonids and their habitat. The area lies within the LSA and RSA as shown in "Figure 5.4-1 Aquatic Spatial Boundaries". However, for the hydrology, hydrogeology and the "valued component scoping" for the fisheries and aquatic resources, only Cowie and Cougar Creeks are included. Whilst these are the two creeks which would most likely be directly affected, it would also be important to

collect baseline data of basic indicators for the other creeks and streams within the study area, so that long term monitoring and evaluation of the overall effect of the mine can be made.

3. Hydrology: (ref. Section 5.5.2.2)

Potential effects and mitigation include "Flow changes from water management, surface water diversions, and groundwater pattern alterations". If groundwater pattern alterations occur, how would this impact water flow in nearby discharge and recharge zones, aquifers, streams and wetlands? These flows would need to be monitored and evaluated, as well as provided immediately for public internet access to the results, as mentioned above.

4. Fish Population Numbers: (ref. Section 5.5.2)

The dAIR/EIS Guidelines document does not provide information about fish populations and species. FBSES considers this information very relevant as these data serve as a benchmark in considering whether and to what extent enhancement efforts should be undertaken. Annually, we enumerate salmonid species, both seaward migrating juveniles and spawning adults, in those streams in our area designated as indicator creeks by Fisheries and Oceans Canada (FOC). These data are available and should be incorporated in the document.

5. Mine Plan: (ref. Section 2.2.6)

"The mine plan will consider the results of environmental studies in order to minimize potential effects of the proposed Raven Project. The proposed Raven Project footprint would be located and sized to minimize potential effects." The word "minimize" should be clearly defined and any potential effects clearly identifiable and measurable so that appropriate monitoring and remedial measures can be identified, processed and undertaken.

"The Application/EIS will include preliminary designs of any proposed culvert upgrades. In addition, the proponent will work to the best of its ability with other stakeholders to address common aspects of the road construction, road maintenance, and safe road use." (page 13)

Many lessons were learned during the construction of the Inland Island Highway (Hwy 19), particularly with regard to the disruption to fish habitat and increased sediment loads in the fish-bearing streams. It is recommended that the proponent should liaise with FBSES, wherever appropriate, and ensure that any work on culverts or other structures within the streams conforms to acceptable standards, so as to preclude such structures from creating barriers to anadromy, and will only be undertaken to completion during the "fisheries window" as recommended by FOC.

6. Emergency Planning and Response: (ref. Sections 2.2.7 & 2.2.8)

There should be clear Emergency Preparedness and Response Plans in place in case of mining failures such as accidental spillage from trucks into fish-bearing