

Personal Information Withheld

Hi Rachel and Andrew,

Attached please find comments from Friends of Clayoquot Sound regarding the draft AIR for the proposed Raven coal mine. Also copied below.

Thanks for considering our input.



June 27, 2011

To:
Rachel Shaw, BC Environmental Assessment Office
Andrew Rollo, Project Manager, Canadian Environmental Assessment Agency

Via email: raven@ceaa-acee.gc.ca

Dear Ms Shaw and Mr Rollo,

RE: Draft Application Information Requirements (AIR) / Environmental Impact Statement Guidelines for Compliance Coal's proposed Raven Underground Coal Mine on Vancouver Island

Please be advised that Friends of Clayoquot Sound are completely opposed to the Raven coal mine proposed by Compliance Coal Corporation for the east side of Vancouver Island between Fanny Bay and Buckley Bay.

As global citizens and Vancouver Islanders we are appalled that such a regressive and environmentally damaging project is being considered.

The stated goal of the environmental review process is to "ensure that major projects meet the goals of environmental, economic and social sustainability." We fail to see how the proposed Raven coal mine could meet any definition of sustainability. It would contaminate salmon streams, drinking water, Baynes Sound and further afield; endanger the Baynes Sound shellfish industry that employs over 600 people and the region's tourism economy; produce climate-stabilizing greenhouse gases; and all to export coal overseas, mostly to Japan and Korea.

Although there are scores of reasons why the proposed Raven coal mine should not proceed, in this submission we focus on three negative impacts it would have on Clayoquot Sound: decrease in highway safety and harm to the tourism economy because of coal truck traffic on highways, and potential transmission of dioxins to the Sound from dredging of Port Alberni harbour to build a coal export terminal.

Coal trucks on Highway 4: impacts to safety and tourism

Trucking coal to Port Alberni from a Raven mine would add 6 huge coal-hauling trucks per hour (one every 10 minutes) day and night to existing traffic on Hwys 19 and 4. We are particularly concerned about Hwy 4, which is the only road in/out of Tofino. Slow

moving coal trucks on this mostly single lane highway would cause congestion and bottlenecks that would deter tourists from making the road trip to Tofino. With almost a million visitors a year, summer highway traffic can already be problematic. We anticipate a dramatic hit to the area's tourist economy should the Raven proposal go ahead. The area affected would include the towns of Tofino and Ucluelet, as well as Pacific Rim National Park.

We are worried that constant coal truck traffic would make highway driving more dangerous and cause more accidents. Additionally, coal dust escaping from the trucks would be a health hazard.

Re-suspension of dioxins from dredging of Port Alberni harbour:

Coal from a Raven mine is to be exported overseas, requiring the building of a coal export terminal in Port Alberni harbour. This in turn would necessitate dredging of bottom sediments that are contaminated with toxins released from the Alberni kraft paper mill that operated from 1947 to 1993 and used chlorine bleaching. The toxins include PCDD/Fs (polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans), pentachlorophenols, PCBs (polychlorinated biphenyls) and methyl mercury. The proposed dredging would re-suspend these toxins, allowing them to become bioavailable and exposing human and non-human life to these known carcinogens. Additionally, re-suspension of historically contaminated sediments would occur frequently, from agitation by tugboat propellers and from re-dredging to remediate accidental coal spills that would inevitably occur during ship loading.

The potential exists for currents to carry such re-suspended toxins to Clayoquot Sound and points inbetween. In 1993, samples of Dungeness crab collected from the Sound contained pulp mill origin toxins (Yunker et al. 2002).

Dioxins, furans, PCBs and mercury are some of the most toxic substances known, causing birth defects, cancers and diabetes and affecting reproductive and immune systems. Once these toxins were traced to effluent from chlorine-bleaching kraft mills, regulatory changes in the late 1980s resulted in BC pulp and paper mills virtually ceasing to produce dioxins and furans. Since 1998, Environment Canada has listed dioxins and furans as Track 1 toxic substances targeted for virtual elimination from the environment.

The historically accumulated toxins at the bottom of Port Alberni harbour are currently mostly inaccessible to marine organisms as they lie buried under sediments deposited by the Somass River and various creeks. Dredging that would re-suspend these toxins and make them bioavailable again should not be allowed.

FOCS Requests:

We request the following from the environmental review process for the proposed Raven coal mine:

- a joint federal/provincial review panel with public hearings

- thorough studies on the Hwy 4 transportation corridor to Port Alberni, including engineering, traffic safety, ecology and human health
 - comprehensive study on socio-economic impacts in the whole affected region, including Clayoquot and Barkley Sounds
 - quantitative wind and current modeling to determine the physical transport of coal and dredging-related pollution
 - marine sediment sampling along all projected pollution routes, to establish baseline conditions
 - a marine sediment monitoring plan capable of measuring future exposure and effects of pollution
 - assessment of the exposure to and effects on human and ecosystem health of re-suspension of dioxins and related toxins (from dredging)
 - complete aquifer mapping and modeling of the whole Raven tenure
 - a full mine plan and water management plan for the proposed Raven mine
 - inclusion of the Bear and Anderson coal projects in the review because of cumulative effects on Baynes Sound
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