

Rob Fleming, MLA - Victoria, British Columbia

Please find attached the PDF submission for the Ravel Coal Mine project on behalf of Rob Fleming, Official Opposition Environment Critic. The paper copy has been send via mail.

Rob Fleming, MLA

Victoria - Swan Lake

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**Province of
British Columbia**
Legislative Assembly



Rob Fleming, MLA
(Victoria - Swan Lake)

June 24, 2011

Rachel Shaw
Project Assessment Manager
1st Floor 836 Yates Street
Victoria, BC | V8W 9V1

Dear Ms. Shaw,

In response to the draft Application Information Requirements (dAIR) as part of the environmental assessment of the Raven Underground Coal Project, we continue to submit that the project should be referred to a joint Federal-Provincial Review Panel. It has been made abundantly clear that the outstanding environmental concerns and public scrutiny of the project thus far warrant the comprehensive assessment that a joint review panel would deliver.

In addition, we submit that further information and study is required in order to adequately assess the potential environmental, socio-economic, and human health implications related to this project.

When questioned on the impacts that the Raven Underground Coal Project may have on the Baynes Sound Aquaculture industry on May 6 2011, the Honourable Minister of Agriculture Don McRae said that that Government "*will protect this resource with the highest environmental standards possible. It is absolutely essential.*" However, it has become clear that the Minister's assurance is not the case.

By proceeding to review the Raven Underground Coal Project under the current terms of a comprehensive study rather than a joint Review Panel, many outstanding environmental questions may not be addressed and the concerned public will not have the deserved opportunity to provide the project with the needed questioning and scrutiny warranted.

Further Information Required:

The impacted communities are justifiably alarmed about potential adverse impacts that may occur as a result of the project proceeding. Because of this, groups have cited numerous sections of the dAIR that still require further information and study in order to adequately assess the potential environmental, socio-economic, and human health implications related to this project. We submit that further information is required on the mitigation of potential adverse impacts such as:



- the loss of hundreds of jobs in the world-renowned shellfish industry should contamination occur;
- the impacts on air and water quality resulting in human health impacts;
- the impacts on wild salmon habitat and trout habitats;
- the impacts on other wildlife including bird species in the area;
- the impacts of increased truck traffic and concerns related issues of truck safety;
- the increased carbon emissions and climate change implications as a result of the project.

Loss of hundreds of jobs in the world-renowned shellfish industry:

Given the mine's proximity to Baynes Sound, one of the richest shellfish aquaculture grounds in British Columbia, concerned members of the Aquaculture industry have voiced their opposition to this project. Should contamination from this project occur there is a potential for a loss of hundreds of jobs in this world-renowned shellfish industry.

Given this grave risk to an economically important industry which has the potential to last indefinitely, versus a project that the proponents admit will not last two decades, we support the request of the Shellfish Growers Association that the proponent be prepared to post a bond which would financially compensate growers for any lost income as a result of the development if it is allowed to go forward. As a condition of this, we submit in response to the dAIR that the details of such a bond should be made public prior to the final approval of this project.

Impacts on air and water quality, fish and bird habitats:

Given the potential impacts on air and water quality, we submit that the dAIR should include further ecological studies on all of Baynes Sound, Comox Harbour, the Courtenay estuary, and the Alberni Inlet. The site would also have the potential to damage many countless wild salmon, trout and migratory bird habitats should contamination of aquatic areas occur. As a result, we submit that the current scope of study on hydrology, fisheries, and aquatic life in the dAIR is too limited. It should cover the entire Raven coal tenure. It should also include comprehensive aquifer mapping with conceptual, analytical, and numerical models describing the fate of water pre-, during, and post-mining.

Adverse impact of increased truck traffic and truck safety:

The transportation route for the proposed Raven Project along Highway 19 (Inland Highway Route) and Highway 4 to Port Alberni traverses through one of the most spectacular routes in the Province - including Cathedral Grove (MacMillan Provincial Park). A substantial increase in heavy truck traffic along these highways could potentially result in a substantial increase in vehicle emissions, noise pollution, road degradation, and an increase in vehicle collisions and accidents.



Further more, Highways congested with slower moving trucks could potentially result in reduced tourism and loss of service industry jobs. As a result, we submit that the dAIR take into account these factors when evaluating whether these routes have the current capacity to accommodate the increase in usage without compromising safety or the environmental integrity of the route.

Also, the dAIR does not offer rail as an alternate option for transporting the coal to port. The dAIR states that although rail was identified in the section order, a rail option does not exist at this time, because a rail line is not currently technically and economically feasible. We submit that a cost-benefit analysis of a rail option be included in the final environmental assessment. Furthermore, the cost benefit analysis of including a rail option should also include the public benefits of increased usage and system upgrades to the E & N Line.

Increased carbon emissions and climate change implications as a result of the project.

While the dAIR addresses greenhouse gas emissions and climate change in relationship to the Project activities, it does not address the contribution of the Project's production to GHGs and climate change as a result of product exports. As the exported coal is burned and the CO₂ released into the atmosphere, this would constitute a substantial increase to global climate change that is not included in the environmental assessment. In our view, this scope is too narrow and a more complete tabulation of carbon emissions (including the export's final use) should be included in the final environmental assessment. Furthermore, as there has been dispute over the quality and composition of the deposited coal, we submit that the final environmental assessment also take this into account.

Scope of Public Response warrants a Joint Panel Review:

Public response to the Raven Underground Coal Project has resulted in hundreds of concerned citizens attending project open houses, over 1800 submissions to the Canadian Environmental Assessment Agency's (CEAA) public comment period, over 1,500 submissions responding to the Draft Application Information Requirements / Environmental Impact Statement Guidelines (As of June 22 2011).

Many local groups including local governments, trade unions, industry associations, community, and environmental groups have already passed resolutions and written letters calling for the federal and provincial environmental assessment agencies to undertake a joint panel review with public hearings. Furthermore, in response to the Draft Application Information Requirements / Environmental Impact Statement Guidelines, over 28 groups have stated the importance of allowing the public to have the opportunity to review and comment on the draft Application Information Requirements and final AIR documents, as well as the Application for Provincial EA Certificate.



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By its own definition, a joint Review Panel would allow individuals to present evidence, concerns and recommendations at public hearings. These Review Panels have the unique capacity to encourage an open discussion and exchange of views. As well, a joint Review Panel would allow the public the true ability to scrutinize the proposed project and independent experts the ability to demand further comprehensive studies such as a the mapping of under ground aquifers in the expanded Comox Valley Regional Study Area (RSA) and the complete cumulative accounting of carbon emission released including the importers emissions.

Conclusion:

Since the inception of the project, thousands of local citizens and concerned British Columbians have petitioned the Government to ensure that this project would receive the highest scrutiny possible. Unfortunately, it has become clear that neither the Minister of Environment nor the Minister of Agriculture have ensured this.

It is clear that certain environmental concerns are not being addressed under the current terms of a comprehensive study rather than a joint Review Panel, and that the Ministers responsible are not doing enough to address the concerns of local residents and businesses. In order to satisfy public confidence and ensure the environmental integrity of the project, we urge the Ministers responsible to refer the project to a full joint review and fully consider the additional environmental concerns in the thousands of submitted responses.

Sincerely,

Rob Fleming, MLA
Victoria – Swan Lake
Official Opposition Environment Critic

