

## **Ships Point Improvement District**

**7729 Vivian Way, Fanny Bay, B.C. V0R 1W0**

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To Whom It May Concern:

Re The AIR for the Raven Underground Coal Mine proposal

We, the trustees for the Ships Point Improvement District (SPID), are responsible and accountable for the supply and distribution of potable water for approximately 250 households and the Ships Point Inn on Ships Point. Our water license is for 36,500,000 imperial gallons per year from Wilfred Creek although our uptake is from 3 wells at 4, 4 and 15 meters respectively.

We are very concerned about the possible effects of the Raven development on the quality and quantity of the water that SPID accesses from the aquifer.

We shall appreciate if the BC EAO/CEAA would consider including and responding to the following 9 issues:

1. There must be a requirement for a comprehensive aquifer mapping and modeling of the entire area to be developed under the Raven plan including the interaction between surface and groundwater. We find it difficult to determine the possible effects of the Raven development without the mapping.
2. It is evident from the complexity of the issues involved in this development that the process needs to be expanded to include outside unbiased expertise. We note the expertise of AMEC, but their views may be compromised by their relationship to Compliance. The review process appears too constrained in terms of technical and public input, and we would ask that there be a joint federal/provincial independent expert review panel with full public hearings. We have recently had an example of an inadequately reviewed project in the nominal recharge area for the SPID water supply (and others). The BC government approved a new gravel pit within 6 months of the application with virtually no review of the effects on surface or ground water of this project and very minimal operating and cleanup requirements.

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3. We require the baseline information on the water quality of both surface and underground. This baseline information includes all the possible contaminants associated with an underground coal mine operation. The baseline report should include a location and time matrix and the error limits on the measurements.
  
4. We assume that the underground water standards will be the Canadian Drinking Water standards, but we need this confirmed. In addition, the standards of the surface water discharge from the Raven site must be known and made available for review.
  
5. As trustees, we need to understand the liability process to seek remedy in the event of a deleterious effect on our water supply. This would include a definition of what would constitute an unacceptable increase in contaminants that could be caused by the Raven operation. In addition, we need to know what applicable laws and regulations would be part of a legal lawsuit, what public funds would be available to support such an action and what if any other support the BC government would provide in the event of an issue. The costs could be significant if the water supply is degraded to the point that the water needs to be piped from the surface supplies to the northwest up to 25 km away.
  
6. Key to maintaining the water quality for our residents is the on-site protection and processing systems that Compliance puts in place. There has been much talk of “normal mitigation” but no comprehensive description. In the AIR we would expect to see complete descriptions that take into account
  - water that could flow into the mine development zone from the surrounding area
  - the roughly 2.4 million cubic meters of precipitation that will fall each year on the developed area
  - the dewatering water from the mine
  - the processing water from the coal washing.

The water processing design would include the minimum specification for the impermeable liner of the spoil piles, finished coal piles and holding ponds, the size of the holding ponds and the technical rationale for the size and the monitoring system for the management of the discharge from the site.

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7. The external monitoring regime requires explicit definition including the quantity and quality of tests and the identification of the organization responsible for the testing and reporting, The government has decimated the internal organizations that have traditionally monitored and regulated the mining industry leaving an obvious void that we expect to be filled with a robust and unbiased organization, accountable to the public and the government. To reassure our residents, we would expect all 3<sup>rd</sup> party and government monitoring reports to be released to SPID on a timely basis.
  
8. This is a very environmentally and financially high-risk project. Compliance should be required to provide a highly secured performance bond commensurate with all possible damages. Please provide a description on the structure of this bond. According to the BC Minerals Act, bonds must be provided that cover costs of possible damages and injuries. We expect the government to analyze and decide on the amount that will be needed in case of damages. A detailed summary of the analysis for this bond shall be provided to SPID.
  
9. Our residents voted two years ago to oppose this mine as it is jeopardizing the excellent water we now use. SPID appreciates that the BC government is interested in the economic benefits of such a mine but it is inconsistent with any of the regional plans for this area .We would like to see what the true economic value of this mine would be when compared to the large number of potential financial risks and actual financial costs. This is a particularly problematic project as there will be little or no royalty payments to help cover the many hidden subsidies (road maintenance, port maintenance, etc.).

We anticipate a formal response to this correspondence.

Yours truly,

Ships Point Improvement District Board of Trustees