



WESTERN CANADA
**WILDERNESS
COMMITTEE**

NATIONAL OFFICE

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Dear Rachel Shaw and Andrew Rollo,

On behalf of our more than 60,000 supporters, we would like to submit a public comment to the federal environmental assessment of the proposed Raven Coal Mine.

The proposed Raven Underground Coal Project will have a considerable impact on several communities on Vancouver Island. Communities from the Comox Valley to Tofino – and many points in between -- have concerns about this proposal, ranging from water quality to truck traffic to tourism impacts. Because of the high level of public concern, and the potential devastating consequences for the local environment and economy, the Wilderness Committee would like to echo our previous request that the project undertake a joint panel review process.

While we would like to see more room to increase public participation and independent scientific review that comes with a more rigorous process, we would like to reiterate that we are fundamentally opposed to this project.

We have several concerns with the content of the AIR, with the proposed project, and with the process. This submission outlines our major concerns.

Climate Change

We are concerned about the end-of-pipe greenhouse gas emissions associated with the project. The coal from the mine would add over 80 million tonnes of climate change-causing greenhouse gases into our shared atmosphere. The emissions associated with end-of-pipe production must be included and fully assessed.

The current environmental assessment process is highly flawed given that it does not assess the most crucial environmental issue, climate change. This is simply unacceptable. Once evaluated in the light of internationally accepted current climate science, it becomes very clear that significant adverse environmental effects will result from this project. In light of our role as signatories to the Kyoto Protocol and given the intent of the BC Climate Action Plan this project should simply be rejected outright.

Acid Rock Drainage and Drinking Water

Heavy metal leakage and acid rock drainage from mine waste rock is a very serious and long-term problem. When this substance gets into water it can have devastating consequences on wildlife and human drinking water.

Testing done in the Quinsam River watershed has shown high levels of the

heavy metal arsenic downstream from the Quinsam Coal Mine facilities. It is expected that the Raven Coal Mine will have a similar effect on the sensitive watersheds that flow into Baynes Sound. There must be a comprehensive set of studies done that assess the impacts of heavy metal drainage on the Baynes Sound watershed, the wildlife that rely on it, and the potential impacts on the Baynes Sound aquaculture industry. These studies should include baseline studies and impact analysis from operating mines like Quinsam and historic mines in the area.

The proponent also needs to provide more information about the treatment of waste rock and coal reject, including a full description monitoring plan, and site plan.

Many residents from the Fanny Bay area draw drinking water from the same aquifers that will be impacted by the mine. There is no mapping of the underground water supply, and there is a limited understanding of how the overall watershed will be affected by this project. It is critical that full and comprehensive aquifer mapping and modeling be completed as part of the environmental assessment process.

Shellfish

As it stands, this project threatens the Baynes Sound shellfish industry. This industry employs over 600 people and produces 39% of the oysters and 55% of the manila clams in British Columbia. Their jobs could be wiped out by this project.

This risk must be weighed heavily in the assessment process, as shellfish are a “renewable resources that are likely to be significantly affected by the project to meet the needs of the present and those of the future.”

Full studies of the potential impact of acid rock drainage on shellfish must be studied, including a baseline study of tissue sample. In addition the potential loss of jobs needs to be weighted heavily in the socio-economic review.

Transportation

Mining, storing, loading and transporting coal has caused serious issues with coal dust in many communities. Coal dust has been linked to a variety of respiratory illnesses, kidney disease and other health problems. Trucks from the mine would pass by seniors' centres and hospitals, and through downtown core areas.

Studies need to be undertaken on air quality along the trucking route, potential impact on tourism, and cost to the public of increase road use. There must be a thorough study of potential health impacts from coal dust along the transportation route, and around the storage and loading facilities. Even without comprehensive

study it seems clear that the impacts of transporting this coal across the island should be reason enough for the project to be turned down.

Fish and Wildlife

This proposal stands to impact several wilderness areas, including the Baynes Sound Important Bird Area, the Mount Arrowsmith Biosphere Reserve, several salmon runs, and important island wildlife migratory routes.

Currently, the mine has proposed coal refuse stockpile on several tributaries of Cowie Creek, including fish bearing streams. The full watershed impacts of the proposal need to be studied in the Tsable River as well. This salmon bearing river is spawning ground for Coho and Chinook salmon, and a critical watershed for protection as identified by the Nature Without Borders Regional Conservation Strategy. This area is also home to Roosevelt Elk, water shrews and purple martin – all threatened species. A thorough cataloging of all wildlife, aquatic and terrestrial, that would be directly impacted by construction and operations of the mine must be undertaken by the proponent.

Huge coal transport ships would be going in and out of the waters of Barkley Sound and the Broken Group islands. The ocean bottom in the Alberni Inlet will have to be dredged to make room for the ships. The inlet is the beginning of a key salmon spawning route. The bottom of the inlet is contaminated with mercury and dioxins, which would be stirred up by dredging. Further, spills, coal dust pollution and accidents would all impact salmon and other marine life in the area. A comprehensive study of the chemical composition of the inlet floor, the risks dredging would pose to the aquatic species of the inlet, and a review of Compliance's emergency response plans that include malfunction, accident and disaster scenarios up to tsunamis, should be undertaken.

Furthermore the total study area, and the species studied need to be expanded to include salmon, herring, all area waterfowl.

Cumulative Impacts

With Compliance Energy's rights to additional coal deposits in the region, all future projects that Compliance is considering must be included in all studies. This must include the impact of the Bear Mine outside of Cumberland, and the tentative Anderson Lake holdings.

Although we think that any assessment process worth its salt would include the studies suggested above, the Wilderness Committee would like to make clear that we consider this project unacceptable. No amount of mitigation can make up for the damage that will be done to the wild fish of Cowie Creek, nor can it undo the loss of habitat. Whatever steps Compliance Coal Corporation takes to minimize residential exposure to coal dust will not help those whose health is compromised by what is left over. The burning of this coal would add to the climate crisis, pointing us in exactly the wrong direction from where the best

climate science in the world says we must go.

For these reasons -- but not limited to these reasons -- the Wilderness Committee opposes the Raven Coal proposal in its entirety.

Sincerely

Tria Donaldson, Pacific Coast Campaigner