

CEAR #10-03-55529
Raven Underground Coal Project

Submission on behalf of the Wilderness Committee

The proposed Raven Underground Coal Project, as laid out by Compliance Coal Corporation, is of significant concern to the Wilderness Committee. On behalf of our 30,000 members, and 30,000 additional donors and volunteers, we would like to submit a public comment to the federal environmental assessment.

The proposed Raven Underground Coal Project will have a considerable impact on several communities on Vancouver Island. Communities from the Comox Valley to Tofino 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, it is imperative that there are opportunities for the public to voice their concerns.

We are concerned that the federal environmental assessment review is not engaging the communities that stand to be affected by this project. There is a clear need for the CEAA to do much more to engage with the citizens of mid-Vancouver Island so that local community concerns are reflected in the process.

A project of this type should, at a bare minimum, involve well-advertised public meetings during the comment period, but, considering what is at stake in this process, it is clear that this project should have a much more robust assessment process. We request that this project be subject to a full joint review panel from the both federal and provincial agencies.

We are also 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 atmosphere. The emissions associated with end-of-pipe production must be included and fully assessed.

The CEA Act defines the term “environmental effect” as “any change to the project that may be caused by the environment, whether any such change or effect occurs within or outside Canada.” Climate-destabilizing end-use carbon emissions clearly fall into this category.

We have deep concerns that past federal assessments have not taken end-use carbon emissions into account; a process that cannot assess this crucial environmental impact is simply unacceptable. Once evaluated in the light of the best climate science available, it becomes very clear that significant adverse environmental effects will result from this project. This is one of many reasons why this project should simply be turned down, but one that must be underlined.

Coal that does not get burned will be left behind as waste rock. Over 9,000,000 cubic

metres of waste rock will be dumped into the Cowie Creek Watershed. Heavy metal leakage and acid rock drainage from this waste rock is a very serious and long-term problem. When this substance gets into water it can have devastating consequences on wildlife.

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.

This last point is a risk that 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,” and the industry employs over 600 people.

To minimize the potential of spontaneous fires, coal dust is washed with water. The water used to do this will be drawn from aquifers in the region, which also supply most of the drinking water used by residents of Fanny Bay. 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.

The 200 hectares of the Raven Coal project will be built right on top of tributaries to Cowie Creek. This will wipe out breeding habitat for cutthroat trout. The toxins and heavy metal leakage associated with the project will impact four creeks and rivers, including the Tsable River. 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 will 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.

To arrive in Port Alberni, over 70,000 Giant B-Train coal trucks would traverse the dangerous Port Alberni highway annually. This road curves and twists by Cameron Lake,

and through the extremely busy Cathedral Grove parking lot. From there the trucks will pass over a steep and dangerous “Hump”. With increased traffic there is an increased possibility of traffic accidents.

Coal trucks bring coal dust into communities, a very real concern when it involves a route that goes past seniors' centres and a hospital. These same places are threatened by the increase in diesel truck pollution from such a large increase in truck numbers. The storing, transporting and loading of coal all come with an increase in coal dust, and coal dust has strong links to a variety of respiratory illnesses, kidney disease and other health problems. There must be a thorough study of potential health impacts from coal dust along the transportation route, and around the storage and loading facilities.

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 who's 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, the Wilderness Committee opposes the Raven Coal proposal in its entirety.

Sincerely

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