



November 27, 2017

Teresa Morris
Project Assessment Manager
Environmental Assessment Office
PO Box 9426 Stn Prov Govt
Victoria BC V8W 9V1

a new ERA in watershed thinking

RE: Elk River Alliance Public Comment on Valued Components Selection Document for Bingay Main Coal Project by Proponent Centremount Coal Ltd.

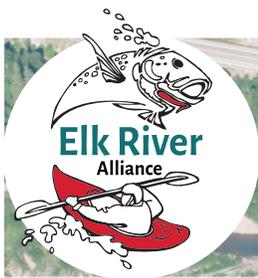
Dear Ms. Morris:

Since the inception of our community-based watershed group in 2011, the Elk River Alliance (ERA) is working to support a vision where well-managed human activities result in healthy ecosystems and a robust economy. Our aim is to connect people to the Elk River ensuring it is drinkable, fishable and swimmable for future generations. We are an organization that: 1) stimulates conversation, shares information and facilitates community input to encourage sustainable water decision-making in the Elk Valley; 2) promotes thinking like a watershed by coordinating a community voice to contribute to watershed planning and management activities, regulatory processes and other regional water initiatives; and 3) strives to unite community by bringing together diverse points of view and offering a safe place to dialogue about the Elk River.

After attending the “Valued Components Selection” open house November 15, 2017, I am writing on behalf of the ERA to the BC Environmental Assessment Office to provide public comment on the proposed Bingay Main Coal Project. I understand that prior to the Environmental Assessment certification application to the BC Environmental Assessment Office, your office must approve the proponents “Application Information Requirements”. This step includes identifying the Valued Components (VC’s) to be studied and the areas within which these studies must occur.

In point form, below are ERA’s main issues with respect to the Application Information Requirements regarding this project, organized according to Bingay’s proposed “Environmental Pillars” and associated Receptor Valued Components. These information requirements place an onus not only on the proponent, but also the Crown, as illustrated by our first concern – water quality.

- **Water Quality (Surface and Groundwater):** There should be a moratorium for approval of any new or expanded coal mine development until the Crown is confident that levels of the five constituents of concern (COC) in the Elk River system, namely: selenium, cadmium, nitrate, sulphate and calcite are stabilized and are decreasing. The Crown must also clearly explain and communicate the basis for its confidence that COC are stabilized and/or decreasing so that the public, in turn, can be confident that the Elk River water quality is protected from further degradation. Any new releases of the COC by proposed mines must not contribute to any increases in the Elk River. The watershed is already affected by five active coal mining



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operations and their legacy dumps. Until water quality issues are decreasing, there is no room for more negative inputs.

Bingay Main Coal Project proposes to sort high-risk leaching waste rock (e.g. selenium) from open pit coal mining operations and store it separately, as well as backfill the mined pit after closure. While these measures are a step in the right direction, it is by no means clear that they will be sufficient to meet the requirements of the Elk Valley Water Quality Plan, especially in such a narrow valley so close to the Elk River. There is insufficient evidence that the Bingay Main Coal Project will meet the Elk Valley Water Quality Plan goals and objectives with respect to surface and groundwater quality.

- **Cumulative Effects on Aquatic Resources, Sensitive Ecosystems, Wildlife and Wildlife Habitat:** The effects of the Bingay Main Coal Project's linear disturbances and creek crossings of the Elk River and several of its tributaries (including 27 kms of rail line and rail load out facility on the east side of the Elk River, expanded 21 kms of Elk River Forest Service Road north of Elkford, powerline and substation) need to be assessed and integrated with the Elk Valley Cumulative Effects Management Framework's (CEMF) retrospective and prospective assessment of its five valued components. In particular, the proposed mine's contributions to cumulative effects on the habitat and movement of grizzly bears, the habitat (including water quality) of Westslope cutthroat trout and riparian habitat should be assessed using the same tools as those used by CEMF.
- **Aquatic Resources and Recreation:** The destruction and loss of Blue Lake and the Blue Lake Recreation Area for Bingay's waste rock storage area is not acceptable to the community.
- **Recreation:** Potential impacts on recreational traffic to the upper Elk Valley are likely to be severe because of increased collision hazards associated with the additional industrial traffic between Elkford and the Bingay Main Coal Project. The quality of the recreational experience is also likely to be diminished and usage may decline.
- **Services and Infrastructure, Community Health and Well-being, Recreation:** Industrial activity and traffic between Elkford and the Bingay Main Coal Project can affect the quality of life and health of local community members because of decreased air quality (especially dust), noise and vibration, increased collision hazard, decreased drinking water quality (particularly effects on groundwater wells), decreased access to valued recreational experiences (as noted above but also including risks to recreational fish species), and effects on property values.
- **Services and Infrastructure:** Increased wear and tear on road surfaces caused by industrial traffic will have an economic impact.
- **Visual Quality:** The proposed project is located in a highly valued landscape near the headwaters of the Elk River. Existing mines and logging have already substantially affected visual quality in the area. The proposed project will contribute to cumulative visual quality effects, which in turn, would affect recreation, community health and well-being and, possibly, the local economy.



As a society we need to weigh the proposed environmental, social, economic, heritage and health impacts of an industrial operation against the benefits of a short 13-year life span. ERA supports the government taking a precautionary approach with proposals such as Bingay Main Coal Project. ERA does not agree that this metallurgical coal mining development will be good for the watershed, adjacent terrestrial ecosystem, and community members. ERA believes this project has the potential to negatively impact the ability of future generations to fish, swim and recreate in a healthy watershed with access to protected potable water.

Respectfully submitted,

Lee-Anne Walker
Executive Director, Elk River Alliance