

# **Environmental Assessment Office**

# **Collected Public Comments for Crown Mountain Coking Coal Project**

May 13, 2016 to June 13, 2016

Comments will be available on this page until June 27, 2016 and after this date all posted comments will be available through the EAO electronic Project Information Centre (ePIC) application.

## **June 13, 2016**

#### Personal Information Withheld - Sparwood, British Columbia

I can not support a project of this scope in this area. We currently have five operational and ever growing coal mines in the Elk Valley which lead to a number of negative impacts on wildlife, the environment, and our ability to recreate.

Critical ungulate winter range will be destroyed. High quality sheep, grizzly bear, and moose habitat will be lost. Travel corridors will be disrupted or eliminated. Access for all outdoor activities (hunting, hiking, snowmobiling and "ATV-ing" etc. will be gone. What about the Selenium issue? How can we add to that problem before a proven solution is implemented?

At what point do we establish a threshold to the industrial activity within the Elk Valley? The cumulative effects of our existing logging and mining operations are piling up and they need to be dealt with, not multiplied.

## **ELK VALLEY MOUNTAINEERS - Sparwood, British Columbia**

To whom it may concern,

This coal mine is a great concern to the Elk Valley Mountaineers.

The Elk Valley Mountaineers is a Sparwood based snowmobile club.

This club was founded in 1968 and has had a cabin and a land tenure at the base of Crown Mountain since 1969.

our club has worked very hard to minimize any effects on wildlife and the environment through

the years and we are very proud of what we have accomplished. We respect the road closure and protect the waters of the valleys.

This coal mine would effect a huge area, impacting both summer and winter activities, plus closing a corridor that would stop access to areas that are not accessible by any other ways.

Plus this mine will effect all widlife in the area were they want to have a load out spot is winter range for the elk.

This mine will effect all the other wildlife in the area such as moose, grizzly bear just to name a few.

We already have five mines in the area do you really think it is a good idea to put another one in that will close all of the back country off, please think of all the wildlife habitat you are destroying and the access that would be lost that people love to enjoy doing out in the back country such a hicking, snowmobiling, riding horses and quading.

#### Sparwood & District Fish & Wildlife Association - Sparwood, British Columbia

The SDFWA are extremely disappointed in the location proposed by NWP for the rail and load out facility. The Grave Prairie lands are part of the Grave Prairie Wildlife Enhancement Plan established in 1988 and to which significant public funding and resources have been allocated for the protection and management of the critical habitat these lands present. Our wildlife cannot continue to lose quality winter range in the Elk Valley. Further, it is our understanding that neither the land owner nor the Ktunaxa Nation support the development by NWP on these lands. Finally, it has come to our attention that NWP have suggested several options for alternate locations for the facilities, none of which are presented in the Project Description, evaluated with regard to their potential impact to valued components (VC's) or described in enough detail to understand their feasibility. In the absence of clarity of where the rail and load out facility and supporting infrastruct ure will be located, neither an informed decision of what the VC's should be considered nor the potential for the project to interact with those VC's can be made.

NWP have not presented a complete project and should be required to do so before further question or comment is made or process is advanced.

Regarding the VC's selected by NWP (Table 4) we offer the following:

- The LSA as defined for Air, Aquatic, Terrestrial and Socio-economic are in our opinion too broad (i.e. not reflective of local effects potential); the result of this will be a diluted effects assessment.
- We request a realignment of these LSA's to reflect the local scale effects that the assessment should report on -As the project will completely remove valley bottom access to an important migration corridor by wildlife and farther ranging carnivores, connectivity is not adequately addressed as a critical VC.
- Connectivity needs to be an endpoint Landscape VC, specifically in regards to Grizzly bears,

- Bighorn Sheep, Mountain Goats, Wolves, and Wolverines.
- The project is located in one of the few relatively undeveloped valley's in the region. As such recreational quality and experience are important to our group. Air Quality as a VC does not adequately consider the impact that this "greenfield" project will have on visual impacts.
- Visual effects need to be included as an endpoint VC -Wolves will be impacted by the project. The west Alexander is an important corridor for movement and the development proposed will focus wolf into more concentrated areas in the valley.
- Wolves should be considered an endpoint VC -It is not clear how Environmental Flow Needs (EFN) will be considered as an endpoint for the project. The Water Sustainability Act of BC requires that EFN be considered.
- EFN needs to clearly be indicated as an endpoint VC -With respect to water quality, the proposed spoil is experimental and does not adequately address further leeching of selenium and nitrates into our watershed. Two significant drainages are to be impacted by this project.

Recreational opportunity is extremely important to our group. The mine site including load out and canyon haul route are in a very traditional areas for fishermen, hunters and other outdoor users. We stand to lose angling access to Harriet & Wilemena lakes, and quality hunting experiences for many valued species. The sustainability of waterways, wildlife and habitat in the Elk Valley is a major concern and as such we simply cannot support this project.

### Ryland Nelson - Fernie, British Columbia

Wildsight abstains from commenting. This project footprint is not certain ie access and loadout. Different locations would change the valued components. We also feel this is not appropriate timing or location.

## June 12, 2016

#### Personal Information Withheld - Sparwood, British Columbia

I am against this crown mountain mine project for numurous reasons such as major wildlife winter ranges between grave lake, grave prairie, grave creek canyon, and crown mountain itself will be destroyed, the pollution of water coming from grave creek and Alexander creek, and access for any valley sportsmen or recreational users will be destroyed.

Crown mountain has its own closure to any motorized vehicle right? Now you tell me what the purpose of this closure is... Conservation of land, wildlife and vegetation? So how is it okay for this to be abused for a chunk of coal? What is going to happen to wildlife? The grave creek canyon is a major highway for all big game animals to access the elk valley, Alexander valley, and the Ericson valley. How will you keep grave creek and Alexander creek from being polluted? Many of us drink the water that flows by the Elk Valley Mountaineers cabin right below crown mountain. Would you drink it after this mine started? The Elk Valley mountaineers thrive in this exact area on crown mountain and Alexander valley. The cabin has been there since 1969, well maintained, clean, and very user friendly. Same for the trail systems that the club built, maintained and kept clean since the same date.

The amount of snow that accumulates on crown mountain varies from 8-12 feet depending on the winter, which makes for a very high spring runoff. I do not know how your going to fit, a gas line, power line, haul road, and whatever else in that canyon, while managing that extreme of a run off that comes through that canyon, without polluting the water. The walls of that canyon sluff every year due to the run off.

As a valley sportsman, I hunt, fish, and use the land for all recreation purposes in this elk valley. Between the towns of Sparwood and Elkford, the grave creek canyon is the ONLY playground we have on the east side of this valley. You take that away from us then what do we have? A straight wall where all 5 Teck mines and this new mine will be all touching eachother border to border.

This mine will ruin so many things, for wildlife, fish, water qualities, and us people. It will be taking away a huge piece of history from this valley as well. There will be an unlimited amount of unhappy campers if this were to go through. All these topics need to be addressed closely.

#### Scott Kozler - Sparwood, British Columbia

Local government and wildlife organizations have closed the top of Crown Mountain because of its wildlife value. Now we want to completely ignore the importance of it value for a coal mine. This area is of great importance to what we have left in any natural habitat. Great care must be taken as our wildlife are in need of historical migration routes to maintain herd health with natural breeding selection.

## Scott Kozler - Sparwood, British Columbia

This is the last valley that is usable for hunters and recreation access. From the Fording River Mine to Coal Mountain, all access to the east is closed in some shape or form.

Crown Mountain Coal is wanting to use a narrow canyon that cannot handle two roads.

If the canyon is used for the mine only, this will stop any recreation access to behind Grave Lake mountain, Soap Creek, Nine Mile, Northfork Pass, West Alexander and inbetween.

#### Scott Kozler - Sparwood, British Columbia

The Elk Valley Mountaineers (Snowmobile club in Sparwood) has a land tenure at the base of Crown Mountain and has not been notified in any way. The club has a cabin in the area and has maintained a trail system for approximately 46 years in that area.

Common courtesy of a notification or a meeting in regards to the safety concerns of the mine would be wise.

### Scott Kozler - Sparwood, British Columbia

Crown Mountain is important Moose habitat. Our moose populations are suffering with no known

cause. The cumulative effect of industry in the Elk Valley has already had serious effects on water, wildlife, and other habitat. To open another mine in an important wildlife area would be unwise.

We need to keep some natural areas natural until such a time as we understand and stabilize our moose populations.

#### Personal Information Withheld - Sparwood, British Columbia

The possibility of another coal mine in the Elk Valley is absolutely sickening. ENOUGH IS ENOUGH. Is it the almighty dollar? The loss of habitat for wildlife and loss of recreational areas due to logging and mining are happening at an alarming rate.

Crown Mountain is a major movement corridor for wildlife breeding of bighorn sheep, mountain goats and especially the declining grizzly bears. All tributaries from Crown Mt end up in the Elk River which already has high selenium levels due to mining and presently there does not seem to be a solution. The Elk River is a known world class river that brings thousands of tourist dollars to the community.

Crown Mountain is used by many recreational groups. The Elk Valley Mountaineers have held a tenure on Crown Mt since 1968. Crown Mt also is a pathway for the Trans Rockies Mountain Bike race. It is a pristine area for hikers, campers, ATV's, snowmobilers but mostly for its spectacular views. There are areas on Crown Mt where you can view for miles into Alberta, all the way north to the Fording. Has any EA personnel actually toured Crown Mountain, Grave Creek, Grave Prairie, etc.

Within the last 3 to 4 months the coal dust is so visible hanging over the Elk Valley, especially if travelling on Highway 3, approximately 14 kms east of Sparwood. If anyone was looking for a small community to retire in, this would be the last choice.

Please just come out to the area, tour the beauty of Crown Mountain, the animal habitat before you consider another coal mine. Please consider the wildlife, water quality, air quality. This area cannot sustain another coal mine.

#### Guy Gioia - Sparwood, British Columbia

I am AGAINST The Crown Mountain Coking Coal Project! It is Prime Big Horn Sheep range and also a migratory route for Elk, and deer through their winter range. I do not want this area disturbed! We will lose access on the entire west side of the Elk Valley from HWY #3 to the north side of Line Creek.

## June 11, 2016

#### **Personal Information Withheld**

Effects to water quality is a huge concern for both the Health and Environment pillars. Another

source of selenium, nitrates and other toxins to our water system is unacceptable. We do not yet understand the success of water treatment efforts underway at other Valley mines. Determine the effectiveness of these processes before approving another mine.

Fish and wildlife effects from this proposal will be negative. Both Alexander Creek and Grave Creek drainages will be affected with the addition of mine infrastructure. These are important wildlife corridors. Grave Prairie is the primary wintering area for ungulates. The addition of infrastructure, roads etc. will adversely effect the habitat. Sediment load in the creeks flowing from this project will increase, especially during peak flows. At times they will exceed the guidelines put forth by government. Ultimately this will have a negative impact to fish and other aquatic life downstream.

Dusting will be significant and is overlooked when out of sight of local communities. Mining and dumping activities generate dust. High winds, which are common in the Valley, carry that dust long distances. Coal stockpiling at multiple locations will generate dust. Dust suppression by watering roadways only curtails a small portion of the dusting problem. Do we need another source of mine dust in the Valley?

Recreational opportunities will become restricted. Safety concerns for the Public and workers will dictate these restrictions. Company concerns related to liability will support restrictions. Ultimately this will reduce opportunity for back country use by recreationalists, including snowmobilers, anglers, hunters, ATV users, and a host of other visitors currently accessing the area.

Other commercial land use, such as Trapping will be affected by this project. Impacts to fur bearer habitat, access restrictions, water quality concerns dust, noise will have adverse impacts.

My concerns about this project are numerous. There are currently 5 operating mines in the Valley, with applications in place for expansion pending approval. There are associated water quality issues that need to be fully understood. Water treatment needs to be proven successful before we move forward approving another mine. Mine closure reclamation plans need to be realized. We haven't seen a mine completely decommissioned and the intended land use values demonstrated, as of yet. The issues around reclamation bonds and how this is managed needs to be understood. The BC taxpayer could be on the hook for this work. Politics have been known to over rule Environmental recommendations - this needs to be resolved.

The Valued Components Report is well done. I expect it meets all of the required guidelines. Regardless, for the reasons discussed above I do not support this project.

Thank you for the opportunity to respond.

## May 28, 2016

#### Personal Information Withheld - Sparwood, British Columbia

I am against the proposed coal mine in the Crown Mountain area for a number of reasons. The most obvious concerns are related to the mines plans for a load out on Grave Prairie. This is not

acceptable. Grave Prairie is key winter range, and historically significant for First Nations. It is also on private land set aside for conservation. The mine plan calls for power, gas, mine access, and a large haul road that also goes through this conservation land. The Grave Creek canyon cannot support this infrastructure. It is a major corridor for Bighorn Sheep, and Mountain Goats among others. The north side of the creek where the proposed road would be is prime Bighorn winter range. A busy haul road would restrict wildlife. Outdoor users would also be affected and likely lose access. Public safety on the road to Grave Lake and through the canyon would be compromised by mine traffic. The area sees lots of traffic from hunters and other groups. Dust, noise, and visual pollution on Grave Prairie and through the canyon would be a concern.

The mine site itself presents a number of issues as well. The plan for water seems weak and not sustainable long term. The location of the proposed pond is prime moose habitat at a time when the BC government is just starting a moose recovery plan. Water quality is a major concern in the Elk Valley. The plan to restrict selenium from entering Alexander Creek is experimental and cannot guarantee more pollution in this water shed.

Grizzly bear numbers are down 40% in this area, and this mine site is in excellent bear country. In addition connectivity would be greatly affected at the mine site and canyon.

The Elk Valley has five major coal mines, heavy logging on both private and public lands and a number of environmental concerns as a result. The addition of more coal mines is not sustainable, and not compatible with healthy wildlife habitat, connectivity, and water quality. The BC government needs to put more worth into these things and quit catering to industry. The EA should determine that this mine is not acceptable, and the government must not overrule.

# May 26, 2016

#### Personal Information Withheld - Sparwood, British Columbia

Regarding the Crown Mountain Coal project, I am concerned both on a level specific to this project, as well as on the broad scale considering how this will contribute to the cumulative effects here in the Elk Valley.

The Elk Valley has five existing coal mines, and four proposals for other projects including Crown Mountain. The Elk Valley also has a large tract of privately owned land held by Canwell (Jemi Fibre), who are currently clear cutting at an alarming rate. The Elk valley has three communities, with a high demand placed on the environment through motorized recreation. The question arises as to what government values, or wants to continue to see on our landscape? Is it full out mining and development, or will the environment and wildlife be considered. I believe we are already past the balance with the five current mines, logging, development, etc. and an additional mine would demonstrate governments disregard for wildlife and the environment. Recently, Garth Mowatt and Clayton Lamb released a study indicating the southern rockies gbpu was down 40% from 2006. Recommendations were to study non-hunting mortality, make bear spray mandatory, and use electric fences. The results of the study will likely affect the annual allowable harvest for hunters as well, yet here we are with more coal mine proposals and roads being built for logging. Does

government truly want to continue seeing grizzly bears on the landscape, or is further resource extraction the priority? The real issue here is secure habitat, not mandatory bear spray.

Responsible coal mining would be to determine the tonnage that can be sustainably extracted from the Elk Valley, and not exceed that. New projects would only be considered when current reserves were exhausted.

Water quality is of huge concern. The selenium treatment plant at Line Creek has not proved its' effectiveness. It is still the only plant operating. How can we start another mine when we haven't got control of the current situation?

Now on issues specific to Crown Mountain here are a few concerns. The infrastructure and haul road go through prime Bighorn sheep winter range. The mining operation and spoil area is productive range for grizzly bears, elk, sheep, goats, and moose etc. The loss of habitat can not be mitigated. The operation is located in the north end of Alexander Creek, and obstructs that corridor necessary for wildlife movement, and identified as a key grizzly bear movement area. The proposed load out area is on wildlife winter range, as well as Teck's Conservation Lands. In fact the canyon where power, gas, and the haul road are located is all in the Teck conservation lands. This kind of development would not be compatible with the values the conservation lands are trying to maintain. The area is popular with locals for hunting and other forms of recreation. Access will be greatly affected. The lifestyle of residents will be negatively affected by further displacement from the landbase.