

Submission on Proposed Telkwa Coal Project

I oppose this project for many reasons but for this submission I will stick to just three, of which I have some experience. Others no doubt will highlight the myriad other reasons for why this project should not be allowed to proceed.

1) Air Pollution: I grew up in a region of NE Derbyshire, UK, where open pit coal mining was rife. As a result, as a child, I suffered serious respiratory illnesses, such as asthma and pneumonia which resulted in me missing most of my first year of schooling. I was not alone. The local education authorities established a special remedial school, called Brambling House, set in a wooded countryside area, for the many youngsters like me who had missed primary schooling mostly due to chest complaints. It was one of only two such schools in the whole of UK. After the coal seams were worked out and Britain introduced its Clean Air Act in 1956 the school was no longer needed and it reverted to a private school.

I know the company has said it will control dust by spraying the tops of railway cars, but most of the air pollution comes from the mining operation itself and it is impossible to properly control it. Even spraying the railway cars is not very effective. We snowshoe and walk on the Smithers golf course several hundred metres from the railway tracks and we can smell the coal when a coal train goes by. The Bulkley Valley already has a serious air pollution problem partly due to its geography which causes inversions. We do not need to add to it. When inversions happen admissions to Bulkley Valley Regional Hospital increase, so this is a major health concern that is not to be taken lightly. The proponent quotes average air pollution values which, according to their modeling, it says will not exceed provincial guidelines. However, it is not average values that need to be considered but rather the extreme events that happen during inversions. Peoples' health should not be jeopardized for the sake of corporate profits and a short lifetime mining venture.

2 Telkwa Caribou: For 13 years from, 2003 to 2016 (when it was replaced by TRAM) I was a part of the Telkwa Caribou Voluntary Recreation Access Group (VRAMG). This was a multi-stakeholder group attempting to protect the Telkwa caribou herd by promoting voluntary recreational access. For all those years most skiers, snowshoers and snowmobilers voluntarily stayed out of the Telkwa Caribou Recovery Area in an effort to protect the caribou. Ultimately "voluntary" compliance was not enough and in 2015 a Telkwa Caribou Wildlife Habitat Area (WHA) was established and, further to that in 2018, a Wildlife Act Motor Vehicle Closure came into effect in portions of the Telkwa Range. Also, by 2004 over \$1/2 million of taxpayer money had already been spent trying to recover and save the herd (\$235,000 from Habitat Conservation Trust Fund (HCTF) and \$310,000 from Forest Resources BC). This does not include salaries and support for full time Habitat Protection and Wildlife personnel. In Addition, the Telkwa caribou herd is now classified as threatened under the federal Species at Risk Act (SARA) so it is protected by federal law. It seems inconceivable and a complete betrayal to all those people who worked so hard on this and gave up their recreational opportunities for so many years in an effort to save the herd that all this good work, money and sacrifice should count for nothing once a foreign owned mining company wants to start mining in the area.

3 Acid Rock Storage Pond: We are told by the proponent that because the spoil from mining operations carries pollutants such as heavy metals and has the potential to cause acid rock drainage the storage facility has to be maintained in perpetuity, i.e. for ever. That is such a ridiculous concept. We don't know what will happen in the next 100 years let alone the next 20,000! Given plate tectonics, vulcanism, climate change and geopolitical events etc. it is absurd to talk about maintaining such a facility "for ever". Also it is intellectual bankruptcy to even consider taking these risks for a mining venture that has a 20 year mine life. Why take the risk while all the while the Bulkley and Skeena drainages are waiting for this toxic deluge should the unthinkable occur?