

Regional District of Bulkley-Nechako preliminary comments for: Proposed Valued Components (VC) and Intermediate Components (IC) for the Tenas Coal Mine Project Environmental Assessment

Applicable Government Policies and Plans: Local Government Official Community Plans (OCPs) guide land use planning and development decisions that reflect the rural community's aspirations with respect to future character, function and form of the Plan Area. There is no mention of the Smithers Telkwa Rural OCP Bylaw No. 1704, 2014 under information sources Table 1. Project facilities are located within designated areas under the Area's OCP and should be considered during the EA review.

The Regional District of Bulkley-Nechako Zoning Bylaw No. 700, 1993 implements the policies and objectives of the Official Community Plan. Telkwa Coal Ltd. may require appropriate rezoning/ OCP amendment, and or/ approvals from the Agricultural Land Commission to facilitate the rail load out facility.

The Project activities and facilities are located within an active agricultural area. The Regional District of Bulkley-Nechako's Agricultural Plan should also be considered under Government Policies and Plan information sources.

There is no mention of the RDBN Floodplain Management Bylaw in the Issues Scoping review. A mine component of notable concern is the rail loop and stockpile sites are found within a designated floodplain area under the RDBN Floodplain Management Bylaw.

The proponent should include other local government's OCPs and related policies and plans where study areas for valued components overlap. For example, OCP's and housing studies for Telkwa, and Smithers.

Light: Project activities have the potential to change/increase light pollution around the existing and proposed roadways, mine site, and rail load out facility. Light may have adverse effects on wildlife, and nearby residents. The RDBN suggest that Light should be included as a subcomponent of the Atmospheric Environment Valued Component.

Vibration: Project activities related to the rail loadout facility, haul route, and mine site will produce vibration. Two residences are 3.5 km from the mine plant and 0.5 km from the haul route. In addition, there are 29 residents found within 1 km from the rail load out facility. Increase in train traffic, and the potential for other users to use the rail loadout facility will increase vibration in the area relative to the project facilities. Vibration is a notable issue that should be monitored and mitigated during the Project's lifespan.

Aquatic Resources Study Area: The study area for Aquatic Resources should be redefined. The Regional Study area does not capture the haul route that crosses many tributaries that flow into the Bulkley River and does not capture the rail load out facility. Sedimentation generated from

road and coal dust may impact nearby watercourses. RDBN suggest increasing the study area to capture all Project facilities, similar to the Fish and Fish Habitat Study Area.

Vegetation and Water Sampling and Monitoring: The proposed haul road crosses Helps Creek Watershed. Helps Creek Watershed hydrology is connected to the wetland listed in the study area that is identified as a subcomponent under the Vegetation VC. Maintaining water quality is an important function in wildlife function and biodiversity in wetland habitats. Therefore, it is suggested that Helps Creek also be monitored for water quality and quantity at the Haul Road crossing.

Vegetation: Since the Project area is found within a landscape corridor under the LRMP, and the project activities will essentially disperse animal movement, it may be worthwhile considering connectivity as a subcomponent of the Vegetation VC.

Wildlife: The significant ecosystems and wildlife values identified by the Ministry of Environment and mentioned in Schedule C of the “Smithers Telkwa Official Community Plan, 1704, 2014” (OCP) include sensitive ecosystems of Black Cottonwood, White Spruce and Moose and Mule Deer habitat. Also, the area contains a Landscape Corridor designated to “maintain connectivity within the landscape, reduce habitat fragmentation, permit movement and dispersal of plant and animal species...”

The scoping document does not include mule deer, yet the project activities have the potential to interact with the species and its habitat. Deer are a harvested species and an integral part to the sustenance foods/ country foods important to the local community. The Regional District supports and encourages development proponents to incorporate protection and enhancement of these values in the design of development within the Plan Area (OCP Policy 4.2.2).

Study Communities: The Local Study Area seems appropriate. However, the Regional Study Area should be extended to include the District of Houston and Witset (Morisetown), as well as rural Electoral Areas ‘A’ and a portion of Electoral Area ‘G’ to the Boundary of Houston municipality.