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Arrowsmith Watersheds Coalition Society

c/o 1266 Jukes Place,
Parksville, B.C. V9P 1W5

Sent by Email and Canada Post
September 20, 2010

Proposed Raven Underground Coal Mine
Canadian Environmental Assessment Agency
805-1550 Alberni Street Vancouver BC V6G 1A5
Telephone: 604-666-2431
Fax: 604-666-3493
Email: Raven@ceaa-acee.gc.ca

Dear Sirs,

Re: Proposed Raven Underground Coal Project CEAA File 10-03-55529

This letter is written and supported by the Arrowsmith Watersheds Coalition Society, an environmental and social interest group interested in protecting the conditions currently enjoyed by all inhabitants of the central area of Vancouver Island. Its main area of concern has been the protection of both the supply and quality of all sources of water.

Please accept this letter as our submission to the Public Comments portion of the Canadian Environmental Assessment of the proposed Compliance/Raven Coal Project.

We request that the following actions and investigations be undertaken before any decision is made on this coal mine:

- 1) The federal Minister of Environment, The Hon. Jim Prentice, conduct **full public hearings** into this proposed coal mine on the grounds that the project must not be allowed to produce any adverse environmental impacts. Such public hearings could address threats to communities, parks and protected areas in the vicinity of the mine and along any transportation routes.
- 2) Identification of all the aquifers and connected hydrological features, including groundwater and streams before an appropriate mine design and environmental impact statement can be developed.

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Email: arrowsmithwater@shaw.ca

3) Every aspect of transportation, the weight of the fully-loaded equipment (truck/trailer), the traffic safety impacts, and the proposed routes of transportation be examined to investigate the full range of environmental, health and safety impacts which could occur, including costs to taxpayers for road upgrades and damage mitigation from high-load traffic. Our concern especially relates to any suggestion of the use of highways through MacMillan Park (Cathedral Grove).

4) Baseline conditions of **aquifers, streams and terrestrial ecosystems** of Baynes Sound area must be established. All conditions surrounding the mining activity during the life of the mine, and from the resultant wastes for decades or centuries afterwards must be monitored and remedial action taken as necessary to bring conditions back to baseline.

The aquatic study area proposed by Compliance is too small. Satisfactory hydrological impact studies must include, at a minimum, the entire 3100 ha that the company proposes to mine and all interconnected surface and groundwater systems, including effects on Baynes Sound.

5) We are concerned about impacts on wildlife, both in and near the mine site, as well as along the transportation route. What are the reclamation protocols to ensure that the all areas of the site(s) will be returned to productive wildlife habitat in a condition equal to or better than currently exists? What monitoring programs will be put in place to ensure environmental conditions at the site(s) and transportation routes are not degraded during the life of the project(s)?

6) We are concerned about dust and noise at the site, along the transport route, and at the coal port. All alternative shipping systems must be reviewed to identify the optimum protocol for shipping of coal from the site to all currently identified and potential customers.

7) We are concerned about acid rock/mine drainage, and elevated levels of toxic metals and sediments in fresh and marine waters. Base line studies must be undertaken over several years to set water quality objectives for all water bodies in or near the proposed mine and the entire mineral claim held by the proponent. What monitoring and remediation procedures will be mandated to protect the cherished seafood and shellfish industry in the area?

9) We are concerned about increased risk of shipping accidents, fuel and coal spillage, in Alberni Inlet and Barclay Sound. This body of water is now the location of many activities that may be considered to have superceded land-based resource exploitation and therefore the environmental analysis should designate a zero level of tolerance for these types of events.

10) Lastly, we believe the use of coal will produce atmospheric carbon with the potential to influence climate change, and its use for thermal or metallurgical applications SHOULD be a consideration in this environmental review irrespective of the destination of the mine's product.

Yours truly,

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Michael Jessen, P.Eng.
Treasurer,
Arrowsmith Watersheds Coalition Society

Parksville, BC

Email _____

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