



Arrowsmith Naturalists
Box 1542,
Parksville, B.C.
V9P 2H4

September 19, 2010

Andrew Rollo
Project Manager
Canadian Environmental Assessment Agency

CEA Registry page and CEAR reference number: 10-03-55529

Re: Environmental Assessment for the Raven Underground Coal Project.

Dear Sir:

The Arrowsmith Naturalists' Club is a member club of BC Nature (Federation of BC Naturalists) with more than eighty members. For over forty years we have represented the interests and concerns of birders, botanists and conservationists in the Parksville-Qualicum area.

Our concerns regarding the Raven Coal Project are many. Foremost, we are concerned about the potential impact of the project on water quality. Little specific work seems to have been carried out in mapping the aquifers and in studying the hydrology of the impacted area. It is imperative, therefore, that a comprehensive mapping of the aquifers and the hydrology of the area take place before any mine design and assessment of environmental impacts are concluded.

Of vital concern is the potential impact of mining on the water quality in Baynes Sound, into which the impacted area drains. At present and because of their quality and abundance, these waters support a thriving aquaculture industry which provides permanent, sustainable jobs for many workers.

Designated as a globally Important Bird Area, Baynes Sound supports a large early spring herring spawn. Not only is this important for the economic benefits it provides to the local fishery, but the benefits are felt also throughout the entire local ecosystem and, by extension, throughout the west coast of BC. Spawning herring provide vital nourishment for the breeding migrations which rely on these waters.

For years, concerned volunteers (with the support and urging of provincial and federal agencies) have worked tirelessly to bring back viable populations of salmon, steelhead and trout to the streams of the area which may be impacted by this mine. In the last few years, these projects

have shown some very positive results, with species appearing which have been absent for years. It is hoped that a thorough environmental assessment of the impacted area will consider the possible effects on these sensitive ecosystems.

Further potential impacts of the Raven Coal project will be visited upon endangered plant and animal communities. Given federal and provincial commitments to the protection and maintenance of biological diversity, we should be doing our utmost to protect such diversity. These are also resources and values which our First Nations populations depend upon in maintaining their culture.

Other concerns of the communities in our area include possible health threats, the congestion of our roads by increased truck traffic, the economic threats both to a viable and diverse tourist industry and a growing reputation for this area as a retirement destination which offers both a healthy, clean environment and a sustainable economy.

For the concerns expressed above, and for others not explicitly addressed, we request that the Raven Underground Coal Project be referred to a joint federal-provincial independent expert review panel with full public hearings. We also request that the aquifers and the connected hydrology be fully mapped before both the design of this project and the impact statements are concluded. Only a thorough and transparent environment assessment, and a subsequent project design which takes into account the findings of this assessment of the project, can answer the considerable concerns of those who call this area of eastern Vancouver Island their home.

Respectfully,

A.T.D. Hutchings,
President,
Arrowsmith Naturalists