

**From:** Hilliar [mailto:hilliar@shaw.ca]

**Sent:** September-20-10 9:55 PM

**To:** Raven@ceaa-acee.gc.ca

**Cc:** info@coalwatch.ca

**Subject:** Raven Underground Coal Project - Canadian Environmental Assessment Registry File number 10-03-55529

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Andrew Rolio, Project Manager  
Canadian Environmental Assessment Agency  
Vancouver BC  
V6G 1A5  
Email: Raven@ceaa-acee.gc.ca

September 20, 2010.

Dear Sir:

I am writing to let you know that I stand with the many other concerned citizens in the Comox Valley and beyond who have grave concerns about the proposed Raven Underground Coal Mine. I share their concerns about the number of miners that will be killed, the traffic deaths from B-train coal trucks traveling on public roads, the impacts on local aquifers and waterways, the impacts on local wells used for drinking water, the impacts on local fish stocks already suffering from low summer flows and diminished habitat. I share their concerns about coal piles catching on fire – (an old coal slag pile caught fire less than a mile from my house just a few years ago). I am concerned about the negative impacts on our tourism industry and the also the Baynes Sound shellfish industry. Even if the water were not contaminated by the mine it will be a hard sell to convince buyers that they should risk their health by eating oysters or clams from a coal mining area. The two industries are simply not compatible. I vote for the shellfish industry.

In short, the mine has more costs than benefits. Our community doesn't need this mine; we didn't ask for it, we don't want it. I would greatly appreciate it if you could simply make this mine go away. Should you find that request beyond your current capabilities, I would ask the following:

1. I request that Minister Prentice (Minister of Environment – Canada) refer the environmental assessment of Compliance Coal Corporation's Raven Underground Coal Project to a joint federal/provincial independent expert Review Panel for full public hearings (CEAR reference number 10-03-55529).
2. I request that Minister Penner (Minister of Environment - BC) ensure that the environmental assessment of the project is carried out by the same joint federal/provincial independent expert Review Panel conducting full public hearings.
3. That before any further considerations be given to the proposed project, comprehensive aquifer mapping and modeling of the entire Raven coal tenure be completed and fully vetted publicly. The 3100 hectare Raven tenure included all or significant portions of the watersheds of Cowie/Cougar Smith Creek, Tsable River, Wilfred (Coal) Creek and Hindoo Creek which flow into Baynes Sound. It is essential that the hydrology and dynamics of these surface water systems and their interactions with groundwater be understood.

I would also like to express my dismay at the government process developed for the assessment of what could be a massive coal mining industry affecting all of mid Vancouver Island. Should the Raven Project be approved it would seem a foregone conclusion that the mining infrastructure in place will be a strong incentive for the approval of further mining projects in the nearby region.

In its own documents, Compliance Energy Corporation has stated that "5.0 million tonnes [of coal] would be accessible by open pit methods" at the Bear Coal Project near Cumberland. The mining licences held by Compliance for the Bear Project total just over 2000 hectares with 8.5 million tonnes of coal resources. The Bear Coal Project is only 10 km to the northwest of the Raven Project and Compliance documents have stated that the Bear Project "**would be developed in conjunction with the Raven deposit**" and that, "Recent showing **between the two deposits** provide encouragement that this area could host in excess of 100 million tonnes of metallurgical coal." (See Appendix B of Environmental Law Centre letter to your office dated August 17, 2010.)

This means that information held by Compliance shows that the Bear and Raven projects are linked by a massive 100 million tonnes of metallurgical coal which in effect turns the whole area into one massive coal mine project some of which will be mined by underground methods and some of which will be mined by open pit.

Compliance Energy has thus, already acknowledged that it will develop an open pit mine at the Bear Project in conjunction with the underground Raven Project, all linked by a massive deposit between the two. Shouldn't your office make the same acknowledgement? The entire area is slated for mining and should be assessed as such.

Given this information, it seems totally inadequate to assess the environmental impacts of the Raven Project in isolation from related projects already on the drawing board.

I hope you recognize that approval of the Raven Project could unleash an industrial juggernaut causing devastating changes to the environment, the economy and the culture of mid Vancouver Island. Please proceed as if the lives of your children and mine depended upon the wisdom of your decision. I believe they do.

Sincerely,

Chris Hilliar