

To Andrew Rollo, Project Manager
Canadian Environmental Assessment Agency

Dear Sir:

I am writing on behalf of the Comox Valley Water Watch Coalition. We have a number of concerns about the potential impacts of the proposed Raven mine.

It seems wasteful of time and resources (human and natural) to engage in a process to assess the environmental impacts of a coal mine. The potential health and safety risks to local communities, as well as carbon impact (global and local) are already well documented and widely known.

What is "Clean Coal"? Companies are required post bonds in order to cover the costs to "mitigate impacts" and "reclamation". Impacts would be averted and there would be no need for reclamation if the project were forestalled!

However, given that the only voice citizens have in decision-making requires us to participate in the process, we pose the following questions and hope that your agency will address them.

WATER QUALITY:

- The aquifers which will be impacted are 2 kms or less from the residential community of Fanny Bay. What will be the cumulative effects of mine activity on drinking water, water for domestic uses, the shellfish industry, salmon habitat?
- What quantity of water will be needed to wash the coal? From what source will this water be drawn? How will contaminated water be deterred from leeching into underground water sources?
- What is the acid generating potential of the mine? What about acid drainage? What about elevated levels of arsenic and other toxic metals?
- How will the Drinking Water Protection Act be administered by the Provincial Government?
- What endangered species exist within the boundaries of the proposed mine?

AIR QUALITY

- How will methane emissions be handled?
- How will the coal dust impact the health of people, particularly those who already suffer from respiratory diseases?

- What quantity of carbon emissions will be produced by burning this coal?
- TRANSPORTATION:
- Since the proposed transport route (the Alberni Highway) is already densely populated (and in severe disrepair), is there any option for an alternate route?
- Will a risk assessment be done on the safety of drivers on the Alberni Highway?
- Will the company be held responsible for damages to the highways?

GOVERNMENTAL OVERSIGHT:

- What procedure is the mining company required to follow in order to obtain Water Rights?
- What economic benefits will derive to the Province?
- What powers do local municipal or regional governments have to either halt or further this project?

SOCIO-ECONOMIC IMPACTS

- What impact will the mine have on the eco-tourism industry? The shellfish industry?
- Does the company have job descriptions for each of the positions required to operate the mine? Does it have a verifiable estimate of the number of local employees who are qualified to do those jobs?

We recognize that not all of these concerns fall strictly under the purview of environmental impacts. We trust you will address those which do.

We close our submission with three requests:

1. That before any further consideration is given to the proposed project, comprehensive aquifer mapping and modeling of the entire Raven coal tenure be completed – and fully publicly vetted. The 3100 hectare Raven tenure includes 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.

2. That you refer the environmental assessment of Compliance Coal Corporation's proposed Raven Underground Coal Project to a joint federal/provincial independent expert Review Panel for full public hearings (CEAR reference number 10-03-55529).

3. That Minister Penner (BC Minister of the Environment) 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.

Thank you for your consideration of our concerns and our requests.

Linda Safford for Comox Valley Water Watch Coalition