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Comox Town Residents' Association
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Submission of Comments to the Canadian Environmental Assessment Agency and the BC Environmental Assessment Office as requested regarding the draft AIR/EIS Guidelines document for the proposed Raven Underground Coal Mine Project.

Since 1991, members of the Comox Town Residents' Association have been involved in planning processes for Comox and the wider Comox Valley. The CTRA has provided a voice and a channel to all levels of Government for the expression of citizen concerns. At present there are 162 members who want to know more about the impacts of the proposed Raven Underground Coal Mine, and the possibility of the Bear Surface Coal Mine functioning in conjunction with the Raven Mine.

Compliance Coal Corporation cannot ignore its part in adding to greenhouse gas emissions and climate change by the mining of a carbon producing fossil fuel for sale overseas; just because a market exists there, and profit can be made for shareholders.

We believe that this Project entails a great risk of damage to the long term environmental, social and economic components which citizens have identified as being essential for sustainable communities in the Comox Valley and Port Alberni. Opening coal mines in the Comox Valley, particularly in the chosen location, will bring pollution, impacting our air and water quality, and gradually destroying our clean and thriving sustainable industries, such as tourism, shellfish harvesting and fin fisheries.

In view of the many potential impacts of this Project, the current Review process is not adequate. The proposal must have a more thorough examination by a joint federal/provincial independent expert Review Panel with public hearings. An independent Review Panel is certainly warranted in this case. Citizens deserve no less.

A proposed comprehensive aquifer mapping and modeling of the entire Compliance Coal tenure must be completed. Valuable fresh water will be used for coal washing, when at present we do not know if there will be enough water to support all species into the future.

The proposed Raven (and possibly Bear) coal mines will exist on sloping land which drains to Baynes sound. The land parcels do not exist in isolation one from another. The mining operations will have an effect on fresh and marine waters. Your "baseline observations and studies" should not be limited to one area of land or ocean.

The relatively small area presently chosen for freshwater study should be extended to include the entire Tstable River and Wilfred Creek watersheds. At present, the chosen area of the mine site and its amenities is too small, both in area and scope, to enable any adequate assessment of the threats to these watersheds, and their aquifers, creeks, streams and wetlands.

Please note the importance of studying the hydrology, aquifers, fisheries and aquatic life of the entire Tstable River and Wilfred Creek watersheds **in detail**, together with all shoreline drainage systems that may be impacted by any Compliance coalmine. Attention must be paid to the possibility of damage to marine mammals, their habitat and food sources. Also to be considered in the Environmental Impact Statement is the large number of resident and migratory birds which depend for sustenance upon

Baynes Sound and the Courtenay Estuary; a Provincially designated Important Bird Area. Those who are hired to carry out the assessments must have the requisite scientific expertise and knowledge. All knowledge gained from these studies should be shared with the public.

Ocean currents and tides move water. Please extend the study areas of marine waters to include all of Baynes Sound, Comox Harbour, Courtenay Estuary and Port Alberni waters. Port Alberni Harbour has toxic sediments which will be stirred up by dredging. **Details** are needed about how Compliance plans to deal with these polluted sediments.

Potential impacts from toxic coal washing water, acid mine drainage, and other contaminants must be more clearly identified, studied and stated. The studies should include a detailed examination and evaluation of all potential threats to our fresh water assets and marine waters during all stages of mining. **Details** are needed of exactly what will be done to manage the pollution originating from settling ponds, waste rock piles, and human waste generated at the mine site. What measures will be taken to prevent toxic drainage from the coal which is piled to await loading onto trucks? In Port Alberni these piles will be under cover. What will be done at the Mine site? Compliance must also provide **details** of its plan for Mine closure, and how the Mine site will be restored to its former natural state of healthy bio-diversity, with no future danger of contaminates leaching into any surrounding lands or waters.

What is the extent of Compliance's liability, and exactly what size bond will be posted. We also need to be given a detailed forecast of the projected costs which may have to be met from public taxes. Not just the projected benefits from jobs etc. For example, who will pay for the upkeep of our roads which will deteriorate under the extra weight of heavy coal trucks?

We need to know who will carry out the proposed monitoring at all stages of the Project, and what specifically will be monitored?

The impact of the proposed coalmine will put at risk the health and wellbeing of many human beings and other species. The public must be given details of how you plan to avoid creating such damage, or dealing with it successfully when it occurs. Mitigation strategies are mentioned, but when damage to life systems is anticipated, it would be much wiser to use the precautionary principle and avoid altogether the possibility of damage.

Yours truly,

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Director,
Comox Town Residents' Association.