

To the Canadian Environmental Assessment Agency and the BC Environmental Office

Re: Comments as requested regarding proposed Raven Underground Coal Mine.

The **Comox Town Residents' Association** was founded in 1991 with the objective of involving citizens in planning processes for Comox and the wider Comox Valley. At present there are 162 members. Our Association is not in favour of the Raven Underground Coal Mine proposed by Compliance Energy Coal at Fanny Bay. How can a Company that wishes to be considered ethical and environmentally responsible, ignore the implications of profiting from the mining of a polluting fossil fuel for export to other Countries. At the same time, the proposal will create a potential toxic threat to established clean industries like shellfish farming and tourism in this Country? The Comox Valley currently provides ideal conditions for these clean, sustainable industries; both of which provide long term jobs, and are a major factor in our economy. These industries also provide healthier jobs than coal mining, which can result in lung disease.

We request that the Environmental Assessment of the proposed Raven Underground Coal Project be referred to a joint federal/provincial expert Review Panel for full Public Hearings.

Further, that comprehensive aquifer mapping and modeling of the entire Raven coal tenure be completed and fully publicly vetted.

The following points will give details of our concerns:

- 1) The burning of coal to provide electricity and the making of steel is adding to increased atmospheric carbon and undesirable worldwide climate change. The Provincial Government has introduced good measures, such as the Climate Action Charter, to reduce the amount of carbon released into the atmosphere. The Coal Mine proposed for Fanny Bay is contrary to the Provincial measures introduced thus far to reduce carbon emissions. We trust that any Environmental Assessment of Impacts will consider the effects of the increased release of carbon on the problem of climate change.
- 2) Comox Valley citizens are being asked to conserve water, and regulations are enforced to achieve this. The proposed Mine will use water from our creeks for coal washing. This will impact the supply of surface water and underground aquifers, at a time when there is uncertainty about the source and quantity of water currently available, and the long term effects of climate change on water supplies.
- 3) There will be contaminated waste water from the coal washing, and acid leachate from waste rock piles. Contaminated water finding its way into ground water and creeks is a potential risk to the thriving shellfish industry in Baynes Sound. Our healthy fish bearing creeks and streams should not be put at risk; neither should the wells of rural residents.
- 4) The Comox Valley has a primary tourist industry which provides an economic benefit to many businesses and residents. The introduction of any industry that is contrary to the maintenance of a healthy natural area will lead to a loss of interest in the Comox Valley as a tourist destination.
- 5) Coal is to be transported via the Inland Island Highway and Highway No.4 to Port Alberni for shipment overseas. Coal trucks will greatly increase traffic on No.4 Highway, a winding road which is narrow and dangerous in some stretches; noted for its steep hills, a drop off to Cameron Lake, a high mountain pass, and very large trucks which are already a problem. The local population and many tourists must use the road to reach Port Alberni, and beyond to the West Coast of the Island and Pacific Rim.

Having carefully considered the social, environmental and economic costs and benefits of establishing the proposed Coal Mine, members of our Association want you to know that they are opposed to the Mine on the grounds that the costs far outweigh any possible benefits to this community.

Thank you for the opportunity to comment.