

Council of Canadians, Victoria Chapter - Victoria, British Columbia

Dear Sir/Madam:

We are the Victoria, BC chapter of the Council of Canadians and are writing to let you know that we have grave concerns about the proposed Raven Coal Mine project. We oppose this project for the following reasons:

1)Water Pollution: Cowie Creek and Tsable River will be adversely affected by acid mine drainage and toxic tailings. In addition, the project puts the Baynes Sound watershed at risk, along with its famed oyster and clam industry. This puts 600 jobs, and >40% of our oysters and clams at risk. Ecological studies for Baynes Soud, Comox Harbour, Courtenay Estuary and the Alberni Inlet need to be done. Toxic water from coal washing also needs to be disposed of and it is unclear how this will affect the aquifers. The water management plan presented is inadequate and unclear.

2)Air Pollution. Coal dust has serious health consequences including respiratory illness, kidney issues, etc. In addition, the proposal to use heavy fuel trucks on this beautiful scenic highway to transport the coal will further increase air pollution issues.

3) Greenhouse gas emissions: Coal mining, and coal use are greenhouse gas intensive, and this project is not compatible with BC's climate change mitigation goals. We strongly urge you to consider the climate impact of these projects. It is our understanding that the assessment process does not currently consider climate change impacts. We find this to be an unacceptable oversight.

4) Baseline data: There appears to be little/no baseline data on contaminant levels, especially heavy metals like cadmium. This makes any assessment of mine impacts difficult.

5) Tourism and social effects: This beautiful area is valued for tourism and recreation. What are the effects of a coal mine going to be? How does this mine foster sustainability and long term high quality jobs in the area. Coal mining is not a high quality job. Coal mining is associated with serious health risks, shortened lifespans and low incomes.

6) Misleading claims: While this project claims to produce coking coal for steel production, independent evaluations appear to show that the coal is not of sufficient quality for the project to be viable using coking coal. Therefore, it is likely that most of this coal will be used as thermal

coal, which greatly exacerbates climate and air pollution impacts.

We have many other concerns, including the size of the restoration bond, details on the environmental effects monitoring program, and in general, the overall suitability of a mine in this area. We ask you to reject this proposal as it causes an unacceptably high level of risk for the Comox valley, large parts of Vancouver Island without providing anything more than short term benefits for the mining company.