

DENMAN ISLAND RESIDENTS ASSOCIATION (DIRA)

PO Box 17

Denman Island, British Columbia V0R1T0

June 14, 2011

Environmental Assessment Office
PO Box 9426 Stn Prov Govt
Victoria BC V8W 9V1

Canadian Environmental Assessment Agency
320 - 757 West Hastings Street
Vancouver BC V6C 1A1

raven@ceaa-acee.gc.ca

RE: Public Comment Period for Draft Application Information Requirements Guidelines (dAIR)

To Whom It May Concern:

Please be advised that on June 13th the Denman Island Residents Association unanimously passed a resolution to submit formal comments on the dAIR. DIRA has already taken high interest in the Raven Project having passed unanimous resolutions on the matter in January and May of 2010, and January 2011.

This organization finds many inadequacies in the dAIR including, but not limited to:

- Lack of clarity on inclusion of Denman Island in all relevant study areas, analyses & ongoing monitoring; the dAIR should include, but not limited to: noise field studies in all seasons; air quality; visual & aesthetics assessment (including light pollution in all weather conditions, e.g. low ceiling, as the mine is proposed to operate 24 hours/day).
- Lack of reference to the Islands Trust; the dAIR should recognize the spatial jurisdiction of the Islands Trust, which includes Baynes Sound to the high water mark on Vancouver Island; and, include reference to the Islands Trust Act, mandate, policies, Denman and Hornby Official Community Plans.
- Marine Study Area is too small; should include all of Baynes Sound, Comox Harbour & Courtenay Estuary.
- [Marine Valued Components list is insufficient; should include salmon, herring and groundfish; clams and scallops; wintering water birds \(Baynes Sound is an internationally recognized *Important Bird Area*\).](#)
- Proposed Marine baseline studies inadequate; should include ecosystem studies of baseline metal concentrations in food-web—phytoplankton, zooplankton,

shellfish, fish, birds; information on distribution and abundance of fishes and birds.

- Freshwater study areas for hydrology, fisheries and aquatic life are too small given serious risks of impacts on water quality (from Acid Mine Drainage and other contaminants) and on quantity; study area should include Tsable River, Wilfred Creek and all shoreline drainage systems in the Raven Tenure, with attention to subsurface connections between surface and groundwater.
- Lack of consultation with Denman Island, largest population centre in proximity to the mine; dAIR should describe how the Denman Island community will be directly consulted on this project as no on-island consultation has taken place to date. On January 11, this organization specifically asked that a public meeting during this public comment period be held on Denman Island, but our request went unheeded.

Given the risks and potential impacts of this project, DIRA requests that it be referred to a joint federal/provincial review panel with full public hearings.

We appreciate your attention to our concerns.

Sincerely,

Frank Frketich
President

cc:

Christy Clark, BC Premier
Peter Kent, Federal Minister of the Environment
Terry Lake, Provincial Minister of the Environment
Adrian Dix, BC Opposition Leader
Rob Fleming, Opposition Critic for Environment
Don McRae, MLA
John Duncan, MP
CoalWatch