



Comox Valley Project Watershed Society Box 3007, Courtenay, BC, V9N 5N3
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Rachel Shaw,
Environmental Assessment Office
PO Box 9426 Stn Prov Govt
Victoria BC
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Dear Ms. Shaw,

The Comox Valley Project Watershed Society is a community stewardship organization concerned with all of the watersheds in the Comox Valley and surrounding areas. We have been in existence for nearly 20 years and have been involved in major restoration and research efforts in our local rivers, Baynes Sound and the Courtenay River Estuary. Our Board of Directors includes a number of retired university academics, engineers, and other professionals.

As a stewardship organization concerned with protecting, preserving and managing key natural features in our beautiful environment, we must express our concern with respect to the assessments involved in contemplating the reestablishment of coal mining operations locally, i.e. the Raven Coal project. Based on an increasing and non refutable body of evidence that relates to climate change, an increase in violent weather globally, and our location on a geological fault that all experts predict is due for a sizable earthquake, we would encourage governments to adopt the precautionary principle when contemplating new and totally unnecessary private ventures, especially those controlled by non-Canadian interests. One might suggest that independent assessors might pose the question of, Why when daily global news demonstrates the effects of global warming and climate change might our governments want to sanction a project that will generate huge profits for non Canadians and further contribute to climate change with local increases in carbon emissions as well as emissions half a globe away.

We fully support the plea for the opportunity of independent environmental assessments to be considered equally in the environmental assessment stages of the consideration of this project. We believe that it is not fair to the residents of the Comox Valley, especially the very large infusion of newly retired residents that have moved to the valley for its beauty, clean air and relaxed life style, and who bring to the local community financial resources far exceeding those of the proposed project. These individuals who bring into our community their life savings and yearly pensions are major tax payers and contributors to the local economy. Do they not deserve an independent assessment of the impacts of this project on their lives, and the environment that they have invested in and support?

While we are sure many individuals and organizations have provided evidence that would encourage and support this independent review, we would like to reiterate that:

- The public has not seen a detailed plan of the mine and proposed use and management of water. In the absence of this information, there is little basis for forecasting the extent of mine impacts, especially those relating to acid mine drainage and how this might impact ground water, local streams and rivers, and underground aquifers.

"COMMUNITY STEWARDSHIP THROUGH INFORMATION, EDUCATION, AND ACTION"

- The dAIR/EIS should include ecological studies on all of Baynes Sound, Comox Harbor, the Courtenay River Estuary, and the Alberni Inlet/Somas Estuary.
- The freshwater study areas for hydrology, fisheries, and aquatic life are too small (fig 5.4-1, p.88). . They should cover the entire Raven coal tenure.
- Current status of salmon, steelhead, and sea-run cutthroat populations of the Raven tenure should be determined as benchmark. And a monitoring plan be put into place should the project go forward
- Much more attention should be placed on drinking water and monitoring wells and aquifers in the area.
- Over fifty percent of the shellfish industry in BC occurs in Baines sound and the estuary. This industry exports to places all over the world. Constant monitoring for mineral pollutants in these food sources occur and some products barely fit within international standards, most likely due to the effects of historic coal mining in the area. Can we successfully forecast how new mining ventures will add to these mineral pollutants and negatively impact an industry that for decades has employ valley residents?

In conclusion, we wish to raise our concerns about the project, the process, and the future for the Comox Valley and its residents, its healthy environments, and its wildlife.

Sincerely yours,

Paul A. Horgen,
 Chair, Comox Valley Project Watershed Society Board of Directors
 Professor Emeritus, University of Toronto.