

## Georgia Strait Alliance - Vancouver, British Columbia

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BC EAO  
PO Box 9426 Stn Prov Govt  
Victoria BC V8W 9V1  
Att: Rachel Shaw

Dear Ms. Shaw

**Re: Comments regarding Raven Coal Mine proposal, Draft AIR**

I am writing to voice the opposition of the Georgia Strait Alliance to the Raven Coal Mine, and raise our concerns about the lack of assessment of the short term and long term impacts of this mine on an important part of the ecology of the Georgia Strait.

Georgia Strait Alliance (GSA) has been at the forefront of efforts to protect the Strait of Georgia and its adjoining waters for over 20 years. Through a broad range of education and advocacy programs, GSA is committed to a future for our region that includes clean water and air, healthy wild salmon runs, rich marine life and natural areas, and sustainable communities. We are also committed to a future where each of us who live in the Georgia Basin region is a steward of the Strait, aware of the benefits that these waters bring to our lives and is taking action to protect it.

The Strait of Georgia is a spectacular 10,400-square kilometer (4,000-square mile) inland sea. Countless small creeks and rivers, as well as the majestic Fraser River, feed the system with nutrient rich silt and fresh water, supporting thousands of species of plants and animals. Millions of birds, migrating across three continents and more than 20 countries, depend on the marshes, eelgrass beds, mudflats, beaches and flooded meadows for their survival. This huge estuarine system supports a living ocean including species such as salmon, seals, dolphins, sea lions and the famous orca, emblem of the BC coast.

But Georgia Strait is not only important for wildlife: the region's human population depends on this ecosystem for much sought after resources, work, recreation and a quality of life that makes this such a wonderful place to live. The waters of the Strait support commercial, sport and aboriginal fishing and the shellfish aquaculture industry. They also provide work in transport and other forms of marine commerce.

The proposed Raven Mine is a threat to the environmental, social and economic health of this region in a myriad of ways, from the toxins it will release into our waters to the greenhouse gases its product will emit into our air. Of particular note, the toxins created by the mine would threaten the tributaries of Cowie Creek, which are a breeding ground for cutthroat trout, and will put at risk salmon bearing streams such as the Tsable River. The inquiry into

the decline of the Fraser Sockeye salmon (aka Cohen Inquiry) that is currently underway is revealing the broad range of harmful stresses that are put on our salmon and other marine life. A proposal such as this one – with no comprehensive plan to ensure these toxins do not harm our freshwater and marine systems and no assessment of the cumulative impacts on watersheds – would be one more cut to the thousand already being experienced by our local waters and is completely unacceptable.

Also not being considered is the fact that there are many economic drivers in this region and some will be put at risk if this project is allowed to go forward. The Baynes Sound aquaculture industry – with over 600 employees and producing 39% of the oysters and 55% of the manila clams in British Columbia – would be threatened by the heavy metal leakage and acid rock drainage from the mine. It is unacceptable that no ecological and economic impact studies have been undertaken, and even more unthinkable that we could allow the destruction of a sustainable industry for one that is not.

In a time when we should be promoting and supporting businesses and industries that are part of 'green energy economy', this project will only add to the problem. It focuses on fossil fuel extraction when instead we should be focusing our skills and capacity on supporting renewable sources of energy and building strong economies based on a healthy environment. Not only will there be greenhouse gas emissions from mine construction and operations, including the release of methane gas, but the coal from the mine would add over 80 million tonnes of climate change causing greenhouse gases into our atmosphere. Currently, the Environmental Assessment process does not consider the impacts that projects like this will have on climate change. Turning a blind eye to the impacts of an industry under assessment is irresponsible and we ask that any and all climate change impacts from this project be assessed.

The ecosystem around the proposed mine is rich in marine and freshwater life, as well as home to one of BC's recovery success stories - the Courtenay Estuary, and it supports growing and healthy communities. Georgia Strait Alliance joins the growing number of individuals and groups in the community in opposing the Raven Coal Mine, and we are asking that a joint federal/provincial independent expert panel review - with full public hearings - be established enabling the public to call their own expert witnesses and also to hear the Governments' and the proponent's experts views.

Thank you for your consideration.

Regards

Christianne Wilhelmson  
Executive Director

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