

Green Party of BC
PO Box 8088, STN Central
Victoria, BC V8W 3R7

green
PARTY OF BC



September 20, 2010

Raven Underground Coal Mine Project
Andrew Rollo, Project Manager
Canadian Environmental Assessment Agency
805-1550 Alberni Street
Vancouver BC V6G 1A5

Sent by email: Raven@ceaa-acee.gc.ca

Dear Mr. Rollo,

I am writing on behalf of the Green Party of British Columbia and our members to indicate our opposition to the proposed Raven Underground Coal Project (CEAR reference number 10-03-55529). It is our position that climate change should be an overriding factor in all decision-making about proposed projects like this. Because the burning of fossil fuels is the major culprit in the rapid expansion of greenhouse gas emissions, BC should be reducing our mining of coal, not increasing it through projects like this.

Besides the GHGs that will accompany the actual mining of coal and the transporting of the coal by truck to Port Alberni and by ship to China, China will be burning the coal with low environmental controls. It is the Green Party of BC's position, that BC must count some portion of the GHGs generated in the use of BC mined coal even when that coal is used in another jurisdiction. While this is not the common practice, it should be.

In addition to the concern about expanding our commitment to fossil fuels at the very time when we should reduce our dependence, the Green Party of BC has concerns about the adverse effects of the Raven Coal Mine on the people, land and air quality and the economy of the Comox Valley, Port Alberni and the communities and places along the transportation route, including the adverse impact to Cathedral Grove. We believe that a full, evidence and science based environmental assessment process needs to occur to evaluate this project.

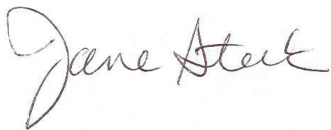
Environmental assessment should account for cumulative impacts from all industrial activity in the area; it should provide a true accounting for the contribution this project will make to GHG emissions over the life of the project, including emissions from the final user; the assessment process should account for ecological, cultural, social and economic impacts;

and, there needs to be true consultation with First Nations in whose territories the activities associated with the mine will occur.

The Green Party of BC supports the following recommendations as put forward by CoalWatch Comox Valley:

1. That you refer the environmental assessment of Compliance Coal Corporation's proposed Raven Underground Coal Project to a joint federal/provincial independent expert Review Panel for full public hearings (CEAR reference number 10-03-55529).
2. That Minister Penner (BC Minister of the Environment) ensures that the environmental assessment of the project is carried out by the same joint federal/provincial independent expert Review Panel conducting full public hearings.
3. That before any further consideration is given to the proposed project, comprehensive aquifer mapping and modeling of the entire Raven coal tenure be completed – and fully publicly vetted. The 3100 hectare Raven tenure includes all or significant portions of the watersheds of Cowie/Cougar Smith Creek, Tsable River, Wilfred (Coal) Creek, and Hindoo Creek which flow into Baynes Sound. It is essential that the hydrology and dynamics of these surface water systems and their interactions with groundwater be understood.

Sincerely,

A handwritten signature in black ink that reads "Jane Sterk". The signature is written in a cursive style with a large, looped initial "J".

Jane Sterk, leader
Green Party of BC

Cc: info@coalwatch.ca
DenmanOpposesCoal@gmail.com