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Rachel Shaw, Project Assessment Manager
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Re: Proposed Raven Underground Coal Project

Dear Rachel Shaw and Andrew Rollo,

The proposed Raven Underground Coal Mine has generated strong public concern all over Vancouver Island. If this project goes ahead, it will have the potential to impact many things Islanders love and depend on for a healthy lifestyle and sustainable economy: clean air and water, the Baynes Sound shellfish industry, the continued improvement in the health of the Somass Estuary, productive salmon runs, our tourism base, to name just a few. Other significant adverse environmental effects include acid rock drainage, increases in traffic on major roadways, impacts on local wildlife, and impacts on groundwater and aquifers.

For these reasons, and many more, the proposal has been met with large-scale public concern. The scale of participation in the Canadian Environmental Assessment Agency's (CEAA) public comment period demonstrates this concern; over 1800 people submitted comments. In addition, hundreds of people have come out to meetings in communities all over Vancouver Island to learn more about the project and the process for approving (or rejecting) the mine proposal.

In order to address these concerns, it is imperative that both the provincial and federal governments undertake a rigorous environmental assessment process. The one that is currently underway is inadequate in that it does not allow for questioning the company's technical experts in a formal setting, nor does it require that the government engage independent experts to assess the company's technical information and present their findings to the public. We need a full public review and consultation process.

Numerous local governments, trade unions, community, and environmental groups have passed resolutions and written letters calling for the federal and provincial environmental assessment agencies to undertake a joint panel review with public hearings, which is the most thorough method of assessment. Many organizations have also requested that the province conduct a comprehensive mapping of the aquifers that may be affected by the proposed mine prior to the environmental assessment process.

It is critical that the public has meaningful opportunities to review and comment on both the draft Application Information Requirements (dAIR) and final AIR documents, as well as the Environmental Impact Statement (EIS, or provincially, the Application for Provincial EA Certificate). An open and accessible public consultation process is the only fair way that the public can learn about the issues involved in this proposed project and provide useful input on the draft AIR, final AIR, and EIS documents.

The BC Environmental Assessment Office has said that "public meetings are conducted in an open, transparent and respectful manner." For this to happen, a process needs to be in place to ensure that the full range of people affected by the project will have an opportunity to learn about the project and register their comments.

People from the Comox Valley to Denman Island to Port Alberni to Victoria have raised concerns about the proposed project and need the opportunity to have their voices heard in the public comment period. Therefore, we, the undersigned, representing a broad coalition of community groups and organizations from all over the province, make the following recommendations for the public consultation process for the Raven Underground Coal Mine proposal:

Timing of Public Comment Period

In order to have active participation from the public in the communities most affected by the proposal, we ask that no public comment occur between July 1 and Sept 1. Many local residents will either be on vacation or will be working seasonal jobs in tourism and other summer industries. Their participation is particularly important and steps should be taken to ensure the public comment period is not in these busy summer months.

In addition, we ask that the public comment period not be commenced until CEAA announces which groups will receive participant funding and how much. Public interest groups are depending on that money in order to hire independent scientists to review the AIR and EIS documents in order to ensure that we provide the most useful and credible submissions to the process.

Notice of Commencement

We ask that the public receive seven days notice before the draft AIR is released to the public (since local governments, First Nations, and other members of the Working Group have already seen the various iterations of it) and the formal 40-day comment period starts. At this time, we should also be notified of the times and locations of all public meetings and open houses for this initial AIR portion of the review process. Notice should be posted on both the BC EAO and CEAA websites, emailed to stakeholders, advertised in local media, and sent to newswires for pickup by local media. This will ensure that community groups, First Nations, and local governments will have time to prepare for the public comment period. This prep time is essential for bringing in scientific, socio-economic, and other experts.

Timing of the Public Meeting

In order for the public to fully review and comprehend the draft and subsequent final AIR, we ask that all public meetings not be held until at least 14 days after the release of the documents. This will allow members of the public to become sufficiently familiar with them so they are able to provide accurate and relevant comments on the assessment that your agencies are seeking.

Public Meeting Schedule

Due to significant local concerns, we ask that public town hall meetings take place in at least the following communities: Port Alberni, Qualicum Beach, Fanny Bay, Denman Island, Cumberland, Courtenay/Comox, and other communities in the Comox Valley. In order for people from Hornby Island to participate, meetings in their area must be held on Friday nights or Saturday afternoons because of ferry schedules.

Meeting Format

In order to respect the broad range of issues and concerns expressed both in the comments received by CEAA and in the public meetings that have already been held in the various communities, we ask that the majority of public meetings not be in an open house format, but instead be held in a town hall format with considerable time allowed for questions and answers. Participants should be able to speak to whatever topics they want pertaining to their concerns or perspectives on the project. We make this request because we strongly feel that continually breaking into small groups in an open house format is an unproductive use of time, especially considering the logistics of moving around the large number of people expected to attend these meetings.

We also feel that any exchanges in the individual small group gatherings or open house stations will be lost to all those not present at that particular gathering or station. Everyone attending a public meeting has the right to hear all the questions and answers raised, not just those few they may manage to hear at the various open house stations. The number of serious environmental factors that need to be discussed are too many to waste time repeatedly breaking up into small groups and then re-gathering all the participants.

Format of Submissions

In previous environmental assessments, it was completely acceptable for the BC EAO to receive public comments by email; currently, one can still submit comments on projects to CEAA by email. However, the BC EAO has discontinued this practice. Many people in the smaller centres and in rural areas do not live close to post offices. They, and most of the rest of the public, use email as a primary form of communication. In addition, registered mail costs money; this might be another barrier to those wanting to comment. Allowing email submissions removes barriers and allows for fuller participation.

In addition, we ask that all comments and questions raised during public meetings be officially recorded and responded to in a similar fashion as comments submitted in other formats. Many people do not realise that when they speak at a public meeting, their comments are not part of the official record. They should be. People have expended considerable time and energy (and in some cases, money) to learn about the project, its potential effects, and then bring their concerns to public meetings. This effort needs to be recognised by the government agencies by recording them and making some kind of transcript or other record freely available.

Please officially register our recommendations and respond in writing about your willingness to implement them.

We know that you share our desire to ensure that the public has a meaningful opportunity to comment on this project.

Thank you for your time.

Sincerely,

Signed by the following organisations, on behalf of their members and directors:

Alberni Environmental Coalition
Alberni Valley Outdoor Club
Arrowsmith Parks and Land-Use Council
Arrowsmith Watersheds Coalition Society
BC Shellfish Growers Association
Citizens' Stewardship Coalition (Port Alberni)
CoalWatch Comox Valley Society
Coal Free Alberni
Comox Valley Water Watch Coalition
Council of Canadians, BC-Yukon Regional Office
Council of Canadians, Comox Valley Chapter
Council of Canadians, Port Alberni Chapter
Denman Opposes Coal
Friends of the Chilliwack River Valley
Friends of Strathcona Park
Georgia Strait Alliance
Mid Island Sustainability and Stewardship Initiative
Mapleguard Ratepayers' Association (Deep Bay/Bowser)
NoCoalMine.net
Oceanside Design
Port Alberni and District Labour Council
Qualicum Beach Streamkeepers Society
Save Our Valley Alliance, Port Alberni
Sierra Club Comox Valley Chapter
University of Victoria Sustainability Project
Vancouver Island Water Watch Coalition
Watershed Watch Salmon Society
Wilderness Committee