

Mid Island Sustainability & Stewardship Initiative
P.O. Box 333, Cedar, B.C., V9X 1W1
Laurie Gourlay, President

Rachel Shaw
Environmental Assessment Office
PO Box 9426 Stn Prov Govt
Victoria BC V8W 9V1
raven@ceaa-acee.gc.ca

Re: Raven Underground Coal Project

June 27, 2011

Dear Ms Shaw,

Please accept this letter as our request that an Environmental Assessment be undertaken with respect to the Raven Coal Mine proposal, by a joint federal/provincial panel of independent experts, including full public hearings.

We have attached our previous letter of September 2010, which initially addressed these matters, and believe the concerns expressed remain in need of such expert consideration before any decisions be made with regard to this mining proposal.

In addition to our previous request we would also note recent and relevant reports that have come to the public's attention since, and that we believe underline the need for a full EA and hearings.

This past week saw a report from a top panel of scientists, for presentation to the United Nations, that the health of the world's oceans is declining faster than previously thought, adversely affected by pollution, overfishing and other man-made problems. This has been equated with a mass extinction in the world's oceans, comparable to that of the dinosaurs.

A follow-up report over the last few days, commenting locally on the ocean's health, suggests that this region, the Salish Sea (Strait of Georgia) and waters around Vancouver island, will be more vulnerable to eutrophication and a higher level of contamination - that our marine environment, if it is to remain functioning and viable, will require a higher level of protection.

Similarly the announcement of a joint federal/provincial 'National Marine Conservation Area', presently in process and proposed to extend north from the Gulf Islands National Park to Gabriola Island and the Nanaimo River estuary, suggests that there is a recognition by Ministers of the Province and the Crown, as well as various levels of government, that more needs to be done to encourage protection of our waters and lands if we are to ensure the practice of sustainable development in this mid island region.

In this respect I personally presented before the World Commission on Environment and Development in Ottawa in 1985, with the recommendation that sustainable community development was the way to incrementally revive ecological systems as well as economic and social components of our societies. I believe this offered support for additional emphasis being placed on local impacts and consideration in the Brundtland Commission's report to the UN.

Similarly the experience and recommendations of individuals and residents of the mid island community need be given the highest priority, given their intimate understanding of bottom line considerations necessary to retain a healthy local environment, economy and sustainability. Full opportunity to be heard at public hearings would further ensure sustainable development is the principle and practice that determines whether the Raven Coal Mine proposal should proceed.

It is worth noting in this light that the institutional framework (governance) for sustainable development was one of two themes deliberated on June 22nd in Vancouver, at the BC consultation to prepare for the 2012 UN Conference on Sustainable Development.

MISSI believes that next year the UN should hear that the world in our backyard, here on Vancouver Island, is not adding to the problem of incremental destruction by fast-tracking a coal mining proposal without full understanding of the long-term impacts to sustainability. Rio +20 should hear that BC and Canada are accountable for, and supportive of sustainable development - that we're doing our part to contribute to, and be responsible for, the global commons and our common future.

To do so will require that economic benefits are balanced with that of the social and environmental components of sustainable development - that vested interests and short-term profits are not favoured at the expense of our communities and natural systems.

In this respect we would then agree with those requests made by residents who have been reviewing the Raven Coal Mine proposal, in light of the needs of local communities, and request:

1. a joint federal/provincial independent expert Panel Review with full public hearings enabling the public to have experts present their views and also to hear the views of the Governments' and the proponent's experts.
2. a comprehensive aquifer mapping and modeling of the full Raven tenure including interaction between ground and surface waters and their relationship to Baynes Sound.
3. inclusion of the Bear Project within the list of future activities whose cumulative effects on transportation, water, accumulation of waste materials in the watersheds flowing into Baynes Sound, and other values must be assessed.

Overall then we would hope that a recommendation is made to ensure that deliberations over the Raven Coal Mine proposal will ensure that residents, and those invested with the care and protection of sustainability and the environment, will be provided with the opportunity to fully participate in hearings and decisions that will affect the region and all communities.

And we hope that the highest standards for stewardship and sustainable development will be set, so that local and regional requirements for sustainable development here on mid Vancouver Island in super natural BC, will be recognized and supported.

Sincerely,

Laurie Gourlay
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