

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

Raven Underground Coal Mine Project
Andrew Rollo, Project Manager
Canadian Environmental Assessment Agency
805-1550 Alberni Street
Vancouver BC V6G 1A5
<Raven@ceaa-acee.gc.ca>

Re: Raven Underground Coal Project
(CEAR, reference # 10-03-55529)

September 20, 2010

Dear Sir/Madame,

I am writing on behalf of the Mid Island Sustainability and Stewardship Initiative to express our concern with regard to possible adverse effects of the Raven Underground Coal Project (CEAR reference number 10-03-55529).

If allowed, it will produce 2.2 million tonnes of coal a year for 20 years - all to be burnt overseas. As well as local impacts to mid island communities MISSI's concerns include the global problems this will trigger by increasing GHG emissions.

Our mid-island east coast is now being viewed by those responsible for the Raven Coal Mine proposal, as well as other speculative and venture investors who we believe are not taking the full impacts of their proposals into account. The residents, communities and ecosystems of mid Vancouver Island will bear the largest impacts, and so full public hearings are necessary in order that the net benefits, if any, can be objectively defined and considered.

Coal mining interests have in effect returned to the east coast of Vancouver Island - but the conditions and considerations are much different than a century ago when coal was king. Should this proposal be successful it is reasonable to expect that other old east coast VI mine sites will also be considered and inspected, with similar intentions. Given that underground mining rights extend throughout the mid island region, under established properties and homes, and that watersheds and aquifers will be affected, there are many important and far-reaching implications that require full review.

The potential for coal development remains on Vancouver Island. Indeed, the mining industry often returns to past. And so the Raven mine proposal near Comox is now in process of consideration. In our opinion then, in order to respect and to permit the public interest to be addressed, with all such inherent implications taken into account, full public hearings need to be conducted into the Raven Coal Mine's environmental assessment.

As residents we need to be able to examine the impacts to ourselves and our local communities, as well as be considerate of the larger picture that is climate change. The balance, and our preferences, need to be examined in this public process.

One mine in Comox, for instance, might lead to an infrastructure, encouraging the return of coal mining along the entire east coast of the mid island region, directly affecting all our communities. The potential impact of coal mining in the watersheds of Cowie/Cougar Smith Creek, Tsable River, Wilfred (Coal) Creek, and the Hindoo Creek which flow into Baynes Sound, therefore need to be fully assessed. The cumulative local effect on present local economies, as well as the global impact of burning more coal and adding to GHG emissions and climate change, need to be evaluated.

In other words sustainability and stewardship needs to be fully considered before any decisions are made with respect to the Raven Underground Coal Mine Project.

We need to know that our communities will not be negatively and cumulatively impacted beyond the capacity of our ecosystems, nor the greater public interest and common good. We need to participate in the decision that will determine what is appropriate development for our region, what impact to our quality of life is acceptable and can be mitigated - and whether the balance to our growing economies might be upset by a return to coal mining on Vancouver Island.

In short, we can respect the contribution that coal miners have made here on Vancouver Island and the heavy labour and risks that they endured, while acknowledging that efforts to avert climate destabilization may require that such coal mining as that proposed by the Raven Underground Coal Mine Project, be relegated to history.

With this in mind MISSI would respectfully request:

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) ensure 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.

Please accept our thanks for your consideration, and for your actions in fulfilling our request.

Sincerely,

Laurie Gourlay
President, MISSI
(250 722-3444)

MISSI ...Mid-Island Sustainability & Stewardship Initiative
P.O. Box 333, Cedar, B.C., V9X 1W1, <www.missimidisland.com> (info@missimidisland.com)