



PO Box 217 Parksville, BC V9P 2G4  
Phone:250.586.0190  
www.mabr.ca

The Honourable Jim Prentice, P.C., M.P.  
Minister of the Environment  
Environment Canada  
Les Terrasses de la Chaudière  
North Tower, 28th Floor  
10 Wellington Street  
Gatineau, QC K1A 0H3

The Honourable Barry Penner  
Minister of Environment  
Province of British Columbia  
Parliament Buildings  
PO Box 9047  
STN PROV GOVT  
Victoria, BC V8W 9E2

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

September 19, 2010

Dear Sirs,

The UNESCO designated Mount Arrowsmith Biosphere Reserve's mandate is to engage our local communities and promote social, economic and environmental sustainability as well as promoting the general principles of the International Convention on Biodiversity.

The Mount Arrowsmith Biosphere Foundation would like to propose several recommendations regarding the proposed Raven Coal Mine review process. We would prefer the review to be a comprehensive process versus a screening level assessment.

The long-term implications of a decision to proceed with coal mining are significant. Its ramifications are many and include but are not limited to:

- International concerns and obligations for the reduction of atmospheric carbon and its influence on climate and marine ecosystems
- The economic and social ramifications of introducing major industrial activity in a region that has developed an economy built around tourism, retirement, quality of life indicators, the arts, technology, fisheries, and education

- Potential impacts on endangered plant and animal communities and Canada and British Columbia's ethical and legal commitments to the protection and maintenance of biological diversity.
- Impacts on rural lifestyles, cultural and social values
- Impacts on ethno-botanical resources and values of First Peoples
- Impacts to water and air quality
- The precedent for the expansion of mining and the cumulative impacts of such expansion
- Health impacts from stress and exposure to particulates and air and water born toxins
- Highway safety
- Noise pollution
- Management of leachate

The Mount Arrowsmith Biosphere Reserve recommends a comprehensive review that considers environmental, economic, social and cultural considerations. MABF has discovered that community interest in issues of sustainability is strong and growing, demonstrated by the large turnouts at public forums that focus on such topics as alternative energy and transportation, growth strategies and food security. Local organizations, the business community, residents and even regular visitors increasingly wish to be informed and involved in decision-making. They are interested in how these decisions will affect the local economy, their lifestyles, and the future for their children. Therefore it is prudent that all members of local communities that may be affected by the proposed mine be informed to the greatest extent possible, and that they continue to have opportunities to participate in the decision-making process.

The Mount Arrowsmith Biosphere Reserve has access to the considerable knowledge and expertise of over 500 biospheres around the world through the United Nations sponsored international organizational structure. We are willing to assist with research, education, accessing local knowledge and communicating community perspectives.

Thank you for your consideration,

Phil Carson  
Chair  
Mount Arrowsmith Biosphere Foundation