



Comox Valley Project Watershed Society 2356A Rosewall Crescent, BC, V9N 8R9
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July 22, 2010

To: The Honourable Jim Prentice, P.C., M.P.
Minister of the Environment,
Les Terrasses de la Chaudiere
10 Wellington Street, 28th Floor
Gatineau, Quebec K1A 0H3

Re: CEAR Reference Number 10-03-55529
(Raven Underground Coal Project)

Dear Minister Prentice

Comox Valley Project Watershed Society is a non-profit charitable organization located in the Comox Valley on Vancouver Island whose purpose is to promote community stewardship of watersheds through education, research and action. Our mandate includes all watersheds from Deep Bay in the south to Oyster River in the north.

We are concerned about the potential significant adverse environmental impacts of the proposed Compliance Coal Corporation's Raven Underground Coal Project and request that your Department conduct an independent expert Review Panel for a full public hearing. This request is made pursuant to Section 28 of the Canadian Environmental Assessment Act.

We believe it is critical to the environmental assessment that full and comprehensive aquifer mapping and modelling be completed and considered so that concerns related to the Watersheds of Cowie/Cougar Smith Creek, Tsable River, Wilfred (Coal) Creek, and Hindoo Creek which may be impacted by this mine can be answered with authority. Impacts to subsurface aquifers and how these impacts might affect Baynes Sound, in particular, and the Strait of Georgia (Salish Sea) in general, must be examined. We are concerned about the quantity of water that will be removed, the flow, and the contamination of the aquifer resulting from the mining process. Impacts on human health and potable water are also a significant concern.

We have further concerns regarding Compliance Coal Corporation's Bear Coal Project which includes a proposed open pit mine. This property lies within the Trent River Watershed, approximately 10 km northwest of the Raven Project. We expect Compliance Coal Corporation to proceed with mining this deposit if the Raven

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Project is approved adding to the cumulative impact of the mining operations.

In addition to addressing the subsurface impacts, we also request that the environmental assessment address the following:

1. Impacts to surface water in the watersheds and Baynes Sound must be examined. Again, we are concerned about the volume of water, flow, and quality due to the mining process. These concerns are heightened during long periods of draught we currently experience during summer months. We anticipate reduced snow pack in the mountains (effecting water temperature and flow during summer months), increased draught in the summer months, and severe storm events in the future due to climate change.
2. The volume of water to be withdrawn from aquifers and surface waters that will be used in washing the coal.
3. The volume of water extracted from the mine during its operations.
4. The impact of extreme weather events and how these may affect the containment of waste water/tailing ponds – for example, potential contamination of watersheds, aquifers, Baynes Sound, and community and private wells.
5. The negative impacts including mine operations and truck traffic that will disrupt wildlife corridors, sensitive habitat, and nature reserves (as referenced in the Comox Valley Growth Strategy, the Comox Valley Sustainability Strategy, and in the report Nature Without Borders [Comox Valley Land Trust]) near and within the mine holdings area.
6. Impacts to aquatic species, both animal and plant, in Baynes Sound and the Strait of Georgia (Salish Sea).
7. Impacts to anadromous fish that occupy the rivers and creeks emptying into Baynes Sound.
8. Impacts to shell fish and the shell fish industry in Baynes Sound.
9. Levels of chemical leaching that might result from washing coal and waste piles as part of the mining process.
10. Impacts of any air borne particulates that might be produced by or caused by the mine

Although not within the Comox Valley watersheds, we have concerns for other watersheds and waters on Vancouver Island that could be impacted by the development of this mine:

- the risk to land and freshwater ecosystems as a result of accidental spillage from transport trucking along Highways 19 and 4 from the mine site to the proposed Port Alberni facilities
- adverse effects that could result from the construction of a coal handling facility on Alberni Inlet
- the risk to aquatic ecosystems in the event of damage or sinking of coal transport vessels in the Alberni Inlet

Finally, we have concerns about the transport of the coal to a deep water port. There appear to be three options for transporting the coal to Port Alberni, Compliance Coal Corporation's preferred shipping port. Compliance Coal Corporation has indicated that they intend to ship the coal by B-train, a large truck and trailer to this port. We believe an environmental assessment should assess the three options and the costs associated with each. The first option, public highways #19 and #4 should determine the cost for maintenance and renewal of these highways as a result of the steady stream of heavy trucks over the proposed twenty year lifetime of the mine. The second option is by rail. This cost analysis should include the costs of upgrading the ENR track and the construction of rail spurs and bridges into the mine site. A third option is to use existing and new logging roads through private timber lands. This option should also be fully costed and considered.

Cumulative effects of proposed major developments in the Comox Valley over the next few years [coal mines, the Kensington Development (2889 to 3354 residential units and a golf course), Sage Hills Development (sports academy, University of Canada West campus, student residences, 2 golf courses, and up to 3000 residential units)] will have a major impact on water quality and quantity as well as fish habitat. These impacts should be assessed along with the expected impact of the changing climate. More severe storm events and flooding, a smaller snow pack in the mountains and the early and rapid melting of this snow and longer periods of drought in the summer need to be addressed in the environmental assessment. Compliance Coal Corporation's Raven Underground Coal Project must be assessed in light of these expected impacts on water availability and quality in the Comox Valley.

We believe the potential impact of this mine on this region requires the most rigorous form of environmental assessment, an independent expert Review Panel with full public hearings, in order to sufficiently address the immediate and long term impacts of the proposed Raven Underground Coal Project.

Yours truly



Don Castleden
Chair, Comox Valley Project Watershed Society