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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

Email: Minister@ec.gc.ca

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

Dear Minister Prentice

I am very concerned about the potential significant adverse environmental impacts of the proposed Comox Joint Venture's Raven Underground Coal Project and request that the project be subject to a **Joint Panel Review**, including full public hearings. This request is made pursuant to Section 28 of the Canadian Environmental Assessment Act.

I believe it is critical to examine this project fully and comprehensively and that it has the potential to cause significant damage to the environment. Most significantly, there is the basic question of whether we should be increasing the amount of CO2 emissions through the burning of fossil fuels? The evidence of Climate Change is clear and we are experiencing its effects currently. This will only get worse if we continue to allow increased mining and burning of coal, no matter what its intended purpose. This question can and should be addressed when considering the Raven Coal Project. It could be considered under the environmental effects as a trans-boundary issue, as the coal will be burned outside of Canada, and also a cumulative effects issue, as the burning of this coal will undoubtedly contribute to the overall CO2 concentrations in the air, no matter where it is burned.

There are more local and regional concerns. The environmental assessment should ensure that aquifer mapping and modeling 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. The assessment should examine questions 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.

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

1. Impacts to surface water in the watersheds and Baynes Sound must be examined, specifically the assessment should address concerns about the volume of water, flow, and quality due to the mining process. These concerns should consider effects of season weather variations such as hot, dry summers, reduced snow packs in the mountains, 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, and the release or impoundments of such water .
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, I also have concerns for the method of transportation proposed (currently by trucks along major provincial highways). The assessment should consider 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. It should also consider adverse effects that could result from the construction of a coal handling facility on Alberni Inlet and the risk to aquatic ecosystems in the event of damage or sinking of coal transport vessels in the Alberni Inlet.

I also note that Compliance Coal has dismissed the option of improving the E&N railway from the proposed mine site to Port Alberni. I encourage the Joint Review Panel to re-examine the practicality of using this alternate form of transport, should the project be given approvals.

In addition, the panel should consider the impacts of the use of the thermal coal fractions not extracted for metallurgical coal. Are these going to be used in the mining process itself? Will any of this coal be used for electrical production? If so what are potential environmental impacts of either burning the coal at the mine site or at an electrical generation facility?

Cumulative effects of the proposed Raven Coal Mine should also consider the effects on regional water supply and adverse effects to the Baynes Sound shellfish industry and to the tourism industry of the Comox Valley.

I believe the potential impact of this mine on this region requires the most rigorous form of environmental assessment, an independent expert **Joint 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,

Rod Heitzmann

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