



**SIERRA  
CLUB  
BC**

304-733 Johnson St.  
Victoria, BC V8W 3C7

T (250) 386-5255  
F (250) 386-4453

E [Info@sierraclub.bc.ca](mailto:Info@sierraclub.bc.ca)  
W [www.sierraclub.bc.ca](http://www.sierraclub.bc.ca)

Rachel Shaw  
BC Environmental Assessment Office  
PO Box 9426 Stn Prov Govt  
Victoria BC V8W 9V1

Dear Ms. Shaw;

**Re: Raven Underground Coal Mine Project**

As Executive Director of the Sierra Club of BC (SCBC), I am writing to convey our significant concern regarding the draft Application Information Requirements/ Environmental Impact Statement Guidelines (dAIR/EISG) document for Compliance Energy Corporation's proposed Raven Underground Coal mine in the Comox Valley. We understand that the mine is expected to remove about 44 million tonnes of coal over approximately 20 years and that it will involve trucking out the coal in 42-tonne vehicles along Highway 4 to Port Alberni.

There are a number of issues that concern us. We are worried about the impacts of harmful coal dust in areas near the mine and along the transportation routes, noise from the 24-hour a day operation, loss of salmon habitat, the threat to the shellfish industry in nearby marine areas, and potential contamination of aquifers that supply the area's drinking water.

The public has not been shown a detailed plan of the mine's proposed use and management of water. The baseline and monitoring sources identified in the dAIR/EISG are insufficient to adequately assess the mine's effects. Comprehensive mapping and modeling of the aquifers for the entire Raven coal tenure should be included.

The dAIR/EISG only mentions Cowie Creek and Cougar Smith Creek as being valuable watersheds affected by the proposed mine; however, we believe it should also include ecological studies of other marine environments that may be affected including all of Baynes Sound, Comox Harbour, the Courtenay Estuary and the Alberni Inlet/Somass Estuary. The current status of salmon, steelhead, and sea-run cutthroat populations of the Raven tenure should be determined as a baseline.

In order for a properly informed decision to be made, we concur with the following requests suggested by the CoalWatch group:

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. 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 material in the watersheds flowing into Baynes Sound, and other values must be assessed.

Sierra Club BC remains concerned about the potential harmful effects this project will have on ecosystems and the communities that depend on them. The Raven mine proposal has potential to devastate the thriving regional shellfish industry and poses significant concerns about sensitive salmon habitat as well as local air and water quality.

We urge you to deny an Environmental Assessment Certificate for the Raven Underground Coal project at this stage until a more comprehensive understanding of the impacts can be understood.

Sincerely,

A handwritten signature in blue ink that reads "George Heyman". The signature is written in a cursive, flowing style.

George Heyman

Executive Director