

September 20, 2010

The Honourable Jim Prentice, P.C., M.P.
Minister of the Environment Environment Canada
Les Terrasses de la Chaudière
North Tower, 28th Floor
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Email: John.Baird@ec.gc.ca

The Honourable Barry Penner
Minister of Environment
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Parliament Buildings
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Andrew Rollo, Project Manager
Raven Underground Coal Mine Project
Canadian Environmental Assessment Agency
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Email: Raven@ceaa-acee.gc.ca
RE: CEAA #10-03-55529

Dear Ministers and and CEAA Project Manager:

The undersigned West Kootenay environmental groups are opposed to the Raven Coal Mine. The coal to be mined represents massive carbon emissions at a time when climate change is threatening the planet. The mine will also cause massive environmental damage on Vancouver Island. It should have a joint federal-provincial Environmental Assessment with full public hearings. Climate change impacts should be part of the review.

It is hardly conceivable that any government today would allow a huge coal mine in the midst of established rural communities, in domestic and fish-bearing watersheds, and near ocean fisheries, without the fullest possible Environmental Assessment and public hearings. Many years of experience with coal mines indicates beyond a shadow of a doubt that this mine will be poisoning people and wildlife through toxic substances in the water and air. By providing only an internal government review, you would be denying the potential victims adequate opportunities to defend themselves from serious harm. This would show, in advance of any final decision, a substantial bias against the victims and for the proponents.

Any credible Environmental Review must include independent hydrology studies for ground and surface water, concerning the transport of toxic chemicals produced

by the mine. The public must be able to publicly challenge all expert testimony and reports.

Our environmental groups are located in the Interior of BC, and we wish to remind you that the impacts of every single new coal mine or expansion of coal production will go all over the world in the carbon it will release and the climate change it will promote. Leading climate change scientists have made it clear that all unmined coal should remain in the ground. By mining and exporting it, British Columbia will be exporting death as surely as if it were exporting weapons of mass destruction.

The carbon tax is a miniscule positive effect on climate change, compared to the overwhelming negative impacts of permitting new and expanded coal production. The main substantive action that British Columbia and Canada must take to show leadership in mitigating climate change is to keep the coal in the ground. Failing that, the carbon tax is a mere charade.

Further, without a joint federal/provincial Environmental Assessment with public hearings, the Environmental Assessment process itself will become part of the problem by refusing the potential victims the right to speak, to be heard and to hear what others are saying, and the right to cross-examine expert witnesses. We hope you will recognize that such an Environmental Assessment would have no public credibility whatsoever.

Sincerely,
Anne Sherrod, Chair
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Gary Diers, President
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