

**Hornby Water Stewardship Project and Heron Rocks Friendship Centre Society -
Hornby Island, British Columbia**

*Hornby Water Stewardship Project &
Heron Rocks Friendship Centre Society
Hornby Island, B.C. V0R 1Z0
June 24, 2011*

To:

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

and

*Andrew Rollo, Project Manager
Canadian Environmental Assessment Agency
320 – 757 West Hasting Street Vancouver BC V6C 1A1*

Dear Ms. Shaw and Mr. Rollo:

*We are writing to request that **The Raven Coal Mine Project be subjected to a joint federal/provincial independent expert review panel with full public hearings** for the following reasons:*

1. ***no consideration has been given to the effects of air pollution on well water on Hornby Island***

1. ***no consideration has been given to the effects of air pollution on rainwater catchment on Hornby Island.***

1. ***no independent joint federal/provincial review and environmental assessment has been initiated for this project***

Hornby Island has been the subject of many water studies, up to 2010, which are available at the Victoria Office of the Islands Trust.

We would draw your attention to the following:

"Groundwater levels in the lowlands, and geologic and topographic considerations do, however, suggest that the upland areas including a significant portion of the subject Crown Land are **important natural groundwater storage and catchment areas**. These areas provide groundwater recharge to wells located within many of the surrounding lowlands of Hornby Island including the small-lot subdivisions where quality and quantity concerns exist. This preliminary assessment has shown that the **upland areas including the subject Crown Land are both sensitive to groundwater recharge and vulnerable to threats of groundwater contamination** and should be protected to help ensure preservation of the quantity and quality of groundwater on Hornby Island."

(Executive Summary: A Preliminary Groundwater Assessment of a Crown Land Parcel on Hornby Island – 1993, W.S. Hodge, Groundwater Hydrologist, Water Management Division.)

and

"Ambient water quality criteria are defined by the Water Management Program as acceptable conditions or levels of substances for specified water uses: **drinking, public water supply and food processing; aquatic life** and wildlife; irrigation and livestock watering; recreation; and industrial use. To date, criteria have been established for 15 water quality variables, including aluminum, chlorine, copper, cyanide, fluoride, lead, mercury microbiological indicators, molybdenum, nitrogen, nutrients and algae, **pH, particulate matter ...**"

(para. 1, ISSUE: Development and use of water quality criteria and objectives, Stewardship of the Water of British Columbia, #7 – Water Quality Management, 1993.)

Long-term observations of the relationship between rainfall and well recharge among private wells on Hornby Island show **the rapid response time between rainfall and well recharge**. The short time between well depletion and recharge indicates **a very limited period of soil filtration of air-borne pollutants and contaminants**.

Also, **the future of water catchment and storage on Hornby Island is at risk**. Current experience on Hornby Island is that a growing number of residents are using collected rainwater

for **all household uses**. Hornby Island is in the air shed that covers portions of Eastern Vancouver Island and Denman Island, inhabited areas often downwind of the mine site during N. and NW winds. **Contaminants of particulate matter and fine coal dust in the air from heavy industry such as that proposed by Raven Coal would have a seriously negative impact on the collection of usable rainwater.**

Residents of Hornby Island insist that **The Raven Coal Project must not proceed without an independent, joint federal/provincial review with full public hearings.**

Sincerely,

Mary MacKenzie, Judith Lawrence, Vicki Bale, John Howard, Cathie Howard, Betty Fairbank, Rudy Rogalsky, Muggs Sigurgjerson, Bob Sarti, Paddy Tsurumi, etc, etc.....

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