

**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.....*

*Hornby Water Stewardship Project and*

*Heron Rocks Friendship Centre Society*