



3rd October 2016

BURNCO Aggregate Mine Project – 54754 Comments Relating to Environmental Impact Statement

Context for Comments:

Howe Sound is undergoing an ecological renaissance following decades of pollution by industrial operations. Clean up costs relating to the Britannia mine operations required an investment of over \$75 million of which only \$30 million was contributed by the mine's former operators. To date, the province has spent in excess of \$46 million on remediation at Britannia. The investment of public monies at this scale, to restore Howe Sound, has led to a subsequent boom in eco-tourism activities. This means industrial proposals such as the BURNCO Aggregate Mine not only risk impacting the marine and terrestrial environments around the Sound but also directly conflict with eco-tourism and recreation activities for which the area has become known.

Comments On The Proposal:

The following points highlight our primary concerns relating to the proposed development.

- The proposal estimates removal of 20 million tonnes of sand and gravel, with pit depths of up to 15 metres across an area of 30 hectares, over a period of 16 years. In addition to aggregate pits the site will house auxiliary sorting, crushing, cleaning, transportation, administration and supporting facilities. The entire site will be based in 70 hectares.
- The proposal is based around the extraction of a non-renewable resource. This resource is being used for building materials, such as concrete, which have high energy and ghg footprints and are non-sustainable.

Biodiversity & Habitat:

- The proponent's consultants highlight over 20 'Species at Risk' that will be impacted by the mine. We do not believe this is acceptable as this high density of 'Species at Risk' indicates the diversity of the habitat provided at McNab Creek.
- For many terrestrial species the EIS highlights that the habitat loss, barriers to movement and change in mortality resulting from the mine will persist through the construction, operations and the reclamation and closure phases.
- As McNab Creek currently hosts bald eagles, Roosevelt Elk, and an estuary flourishing with marine life, the proposal will irrevocably impact the biodiversity of the project area.
- We have concerns regarding the mines effect on marine diversity, fish and the recovering Howe Sound, especially with regards to fish and fish habitat, particularly chum and coho salmon, and echo concerns previously expressed by the Department of Fisheries and Oceans.
- Additional concerns relate to vibrations from the site (during all phases), which will impact key species such as herring and interfere with marine mammals' navigation, food finding, and reproductive systems—effectively alienating orcas and dolphins from habitat they have only recently returned too.
- The proponent makes no effort to consider the cumulative impacts of their project in relation to others, such as the ongoing logging in the McNab Valley and upstream Run of River power projects, all of which combined increase impacts exponentially.
- Development of the mine sets a precedent that may allow for continued operations or expanded scale in the future, outside that currently considered in the EIS.

Societal & Economic

- Howe Sound is becoming a key recreation asset in the Sea-to-Sky corridor, resulting in investment in new infrastructure such as the Sea-to-Sky Gondola and the recently opened Marine Trail. As people come to see and experience nature, the visual and acoustic impacts of an industrial

development of this type are in direct conflict with the peace and quiet for which the McNab Creek area is valued.

- The Estuary and intact wetlands in the Howe Sound watershed provide taxpayers with an estimated saving of up to \$22 million per year through embedded ecosystem services such as flood protection, air purification and water filtration. Loss of the McNab Creek area should be expected to reduce these values.
- Rezoning of the proposed mine site from current rural RU-2 to ‘industrial use’ would continue a precedent that places private profit over community values, opportunity cost born by businesses and residents of the S2S and the deterioration of shared natural assets.
- This proposal seems to come at little, to no, benefit to the local community. Industrial activity will be an eyesore, machinery noise will disturb quality of life and reduce property values. With only 12 permanent jobs created at the proposed mine, the loss of direct and indirect jobs in other sectors of the economy could easily exceed jobs created at the mine.

Due to the above concerns, our review of the BURNCO Aggregate Mine EIS leads us to believe the proposal presents too great a long-term risk, when evaluated against multiple values, to warrant approval.

Sincerely,
Claire Ruddy, Executive Director
Association of Whistler Area Residents for the Environment.