



April 8, 2019

Rue Pope
FrontCounter BC, Authorizations Administrator
SouthwestMinesDivision@gov.bc.ca

Re: Referral Number: 109994684
Reference Number: Ministry of Energy and Mines / 0700195

BC Nature is a federation of naturalist clubs across the province, comprising over 50 clubs and over 6,000 members. BC Nature appreciates the opportunity to comment on this proposal from Imperial Metals for exploration work in the Manning-Skagit Provincial Parks “donut hole”. We had difficulty inserting our comments in the Referral Response online form, so trust that these comments by email will be considered.

We wrote to BC Premier Horgan on July 20, 2018 to express our opposition to the logging occurring in this area, and with reply received from Assistant Deputy Minister on November 5, 2018 (Ref 240991). I am referencing this BC Nature letter opposing the logging so that you are aware that BC Nature’s perspective is to ensure protection of the entire Skagit Watershed.

Regarding the application for Mineral Exploration, our strong preference is that there be no mining exploration or development in this highly sensitive area.

If mineral exploration is to proceed, we wish to ensure that this exploration is done with very stringent environmental controls so as to result in the least impact on the watershed. Here are our suggestions:

Sumps (under the title in the Notice of Work Referral Package, page 7, as Settling Ponds): Mention is made of Sump Ponds (3m x 5m x 2m deep) or water recycling machine. If the Sumps are chosen, these should have a liner to reduce likelihood of groundwater percolation.

Environmental Monitoring:

As this is a sensitive area of international importance, surrounded by provincial parks and with several small drainages flowing into the main Skagit, we would like to see in the proposal details of the Environmental Monitoring that will be required. What frequency will environmental monitoring take place and what professional registration will be required of the monitor? We trust any permit issued would specify details of careful environmental monitoring.

Ministry of Mines:

Given the high profile of this area, we would like to know how frequently Ministry of Mines staff will inspect this exploration work.

Please confirm receipt of these comments from BC Nature. Thank you in advance,

Yours truly,

A handwritten signature in cursive script that reads "Alan E. Burger". The signature is written in black ink and is positioned above the typed name and title.

Alan E. Burger, PhD
President: BC Nature
(Federation of BC Naturalists)

Contact information: Dr. Alan E. Burger, President – BC Nature,
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