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via online form: http://www.eao.gov.bc.ca/pcp/forms/burnco_form.html

BURNCO Aggregate Mine Project
BC Environmental Assessment Office (EAO)
PO Box 9426 Stn Prov Govt
Victoria, British Columbia V8W 9V1

Dear Monica Perry:

Re: Comments on the Environmental Impact Statement / Application for the Proposed BURNCO Aggregate Mine Project

I am writing on behalf of the Islands Trust Council regarding the proposed BURNCO Aggregate Mine Project. I understand you will also be receiving a separate submission from the Gambier Island Local Trust Committee. We are limiting our comments to the marine aspects of the project which are within our jurisdiction.

We appreciate that the EAO invited Islands Trust and Bowen Island Municipality staff and elected officials to participate in the Advisory Working Group. We also appreciate that the EAO held information sessions in September in Squamish, West Vancouver and Gibsons.

We have heard from constituents that they would appreciate more time to comment on this application that could have lasting implications for the culture, environment, and economy of Howe Sound communities.

In our Policy Statement the Islands Trust Council holds that economic opportunities should be compatible with the conservation of resources and protection of community character. For years now, we have heard constituents express a clear desire for governments at all levels to support Howe Sound's ongoing transition from a polluted industrial zone to a thriving environment that supports sustainable businesses, including a world-class tourism industry. The proposed BURNCO Aggregate Mine Project is not compatible with that vision or with the community character of Howe Sound.

I understand that at this point of the environmental assessment process you are seeking feedback on the project and its potential to cause environmental, heritage, health, social, and economic effects. With regard to the BURNCO Aggregate Mine Project application, we have heard strong concerns in our communities on the topics listed below. While I provide suggestions below about potential project conditions, this should in no way be interpreted as Trust Council's endorsement of conditional approval of the project.

- That the EAO be cautious in approving any new industrial projects, including the BURNCO Aggregate Mine Project, until there is a better understanding of the cumulative effects of existing and approved projects in Howe Sound. Stakeholders in the region are still awaiting results of the Ministry of Forest, Land and Natural Resource Operations cumulative effects assessment and monitoring project for the Howe Sound area. In the absence of critical knowledge regarding cumulative effects within Howe Sound, we encourage the EAO to take a precautionary approach.

- That industrial noises from the Project are not compatible with the peaceful, quiet enjoyment of nature that residents and visitors treasure in Howe Sound. There are concerns that the application does not sufficiently address the impacts of noise across water on residents of Gambier Island and recreational boaters who may be at anchor.
 - Suggested condition: The EAO should require the proponent to undertake the four-month construction phase between October and April when there are fewer recreational visitors in Howe Sound.
 - Suggestion condition: Barge loading activity should be limited to 9 a.m. to 5 p.m. on weekdays (no loading on weekends or statutory holidays). We've heard that 7 a.m. in the summertime is too early for a region known as a relaxing recreational destination.
- That the application did not provide sufficient information on:
 - ecological baseline to support conclusions that the Project would not have significant effects in the marine environment during its 16 years of operation.
 - projected sea level rise (combined with predicted storm surges and periodic king tides) to support conclusions that the Project would not cause significant effects to the environment after 2035.
 - the potential for dust during loading of barges and during barge transport to determine potential impacts to the marine environment, marine users and island residents.
- That a spill from the site could contaminate the marine environment.
 - Suggested condition: Requirement for the proponent's Spill Prevention and Emergency Response plan to include a staff person with spill-response training on-site at all times during the life of the project in order to respond to and mitigate the effects of a chemical or hydrocarbon spill.
- That there should be on-going formal opportunities for regional stakeholders to provide feedback to BURNCO on impacts related to the project.
 - Suggested condition: Require BURNCO to fund a residents committee that includes at least two Gambier Island Local Trust Area residents that would offer an opportunity to meet at least twice a year to discuss issues related to the Project.

The Islands Trust Policy Statement, a statutory document founded in extensive community consultation and approved in 1994 by the then Minister of Municipal Affairs, contains policies that should be taken into account by the BC Environmental Assessment Office:

- 3.1.6 Trust Council encourages all government agencies and non-government organizations to consider both monetary and non-monetary costs when making resource management and land use decisions.

- 3.1.9 Trust Council encourages actions and programs of other government agencies which:
- place priority on the side of protection for Trust Area ecosystems when judgment must be exercised,
 - protect the diversity of native species and habitats in the Trust Area, and
 - prevent pollution of the air, land and fresh and marine waters of the Trust Area.
- 3.1.10 Trust Council encourages the Provincial government to enforce standards for control of emissions polluting the air of the Trust Area.
- 3.1.11 Trust Council encourages agents of the government of British Columbia or the government of Canada, Crown corporations, municipalities, regional districts, non-government organizations, property owners and occupiers to protect environmentally sensitive areas and significant natural sites, features and landforms through voluntary stewardship, acquisitions, conservation covenants and careful management.
- 4.5.3 It is the position of Trust Council that development, activity, buildings or structures should not result in a loss of significant marine or coastal habitat, or interfere with natural coastal processes.
- 4.5.4 It is the position of Trust Council that development, activity, buildings or structures should not restrict public access to, from or along the marine shoreline.
- 4.5.5 It is Trust Council's policy that development should be directed to sites away from:
- areas of environmental sensitivity, and
 - areas of naturally occurring stocks of clams or oysters.
- 5.1.1 Trust Council holds that the overall visual quality of the Trust Area and its scenic values should be protected from disturbance, particularly those areas that have distinctive features or are highly visible.
- 5.1.2 It is Trust Council's policy that the intensity of noise and lighting in and through the Trust Area should be compatible with community character.
- 5.3.8 Trust Council encourages Provincial and Federal agencies to ensure safe shipment of materials hazardous to the environment.
- 5.7.1 Trust Council holds that economic opportunities should be compatible with the conservation of resources and protection of community character.

In light of the Islands Trust's mandate and the concerns from community members on the content of the application we hope the EAO will carefully consider all aspects of environmental, economic, social and cultural impacts on the Howe Sound communities throughout the process.

Although we copy First Nations on all correspondence such as this, we have not heard their positions of the Proposed BURNCO Aggregate Mine Project. Given our commitment to establishing and maintaining a mutually respectful relationship with First Nations, we offer the Islands Trust position while being ready to respectfully consider their positions, as they become known.

The Islands Trust Council is a federation of local government bodies representing 25,000 people living within the Islands Trust Area. The Islands Trust is responsible for preserving and protecting the unique environment and amenities of the Islands Trust Area through planning and regulating land use, development management, education, cooperation with other agencies, and land conservation. The area covers the islands and waters between the British Columbia mainland and southern Vancouver Island. It includes 13 major and more than 450 smaller islands covering 5200 square kilometres.

On behalf of the Islands Trust Council, thank you for accepting this submission.

Sincerely,



Peter Luckham
Chair, Islands Trust Council
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cc. Squamish First Nation
Tsleil-Waututh First Nation
Penelakut Tribe
Cowichan Tribes
David Rafael, Senior Planner, Sunshine Coast Regional District
Bowen Island Municipal Council
Gambier Island Local Trust Committee
Islands Trust Executive Committee
Islands Trust website