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File Number: 3070-30 Gambier Island

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

VIA EMAIL: BurncoAggregateMine@ceaa-acee.gc.ca

The Gambier Island Local Trust Committee is a local government with the land use planning responsibility for the land and marine areas for Howe Sound (apart from the Municipality of Bowen Island). As well, our Local Trust Committee, and the Islands Trust as a whole, has a unique legislative mandate to preserve and protect the fragile ecology and communities of the islands in the Salish Sea. To that end, we have a number of submissions to make related to the BURNCO proposal to develop a gravel extraction, processing and shipping facility at McNab Creek.

The Executive Committee of the Islands Trust has the responsibility of speaking to issues of marine safety and environmental health within the Trust Area. The Chair of the Executive Committee is sending a letter addressing Trust wide policy's regarding this project. We have not addressed in this submission the concerns of many related to impacts on marine and terrestrial habitats surrounding the project and that is not because we do not share those concerns but because we wish to focus on certain issues as set out below.

Our Official Community Plans, extending 300 metres beyond Gambier Island and 150 metres beyond all Associated Islands, commit to the following Community Goals which are relevant to this proposed project:

- To fulfill the object of the Islands Trust, which is to preserve and protect the trust area and its unique amenities and environment for the benefit of the residents of the trust area and of British Columbia generally, in cooperation with municipalities, regional districts, improvement districts, other persons and organizations and the government of British Columbia.
- To preserve, protect and enhance the rural character, peacefulness, natural beauty and views of the Gambier Island Planning Area.
- To provide for a variety of quality natural recreational experiences for residents and visitors in a manner that leaves the land in a relatively undisturbed or wilderness condition consistent with maintaining the local trust area's rural tranquility and ecological balance.

As the Islands Trust Executive Committee will be reviewing wider marine issues of this proposed project, the Gambier Island Local Trust Committee has determined to limit its submissions to affected neighbour issues that impact the goals of the Gambier Island Official Community Plan:

- a) Air pollution issues
- b) Noise issues and operating hours
- c) Visual impacts and operating hours
- d) General Community Concerns and acceptability of industrial activity in Howe Sound.

Air Pollution concerns

We note that here, along with elsewhere in the application, the applicant addresses cumulative impacts from the perspective of current conditions and levels of activity. This reflects the flaw in our current assessment system in that it doesn't take into account the cumulative impact of this project, the Woodfibre LNG project, increased traffic on the Sea to Sky Highway, and industrial activity elsewhere on the Sunshine Coast. Each project is viewed in isolation against a backdrop of what is happening at this point in time rather than what is likely to happen in the near term. The Howe Sound air-shed, similar to the marine environment, is currently in a recovery state due to the cessation of some industrial activity and controls on other activities but that improvement is fragile. We urge the EAO to review the cumulative impact of this project on the air-shed (and on other values) including all the planned and projected activity that would affect this air-shed, rather than just based on the current background pollution concerns.

Regarding the dust and solid particulate emitting from the processing and transport of the gravel, we recognize that the applicant has put in place procedures to control the emissions in the processing area both through the use of "below ground" or enclosed procedures and through the use of "watering" processes. We urge that those processes be a condition of any approval.

We remain concerned with the impacts from conveying the processed gravel to barges and then the barging process itself. Controls on emissions of particulate from these processes appears inadequate; when loading barges, the gravel will have to "fall" some distance which will inevitably lead to dust and other emissions. The facility in Sechelt emits a lot of gravel dust which is a nuisance to the community surrounding the facility. Methods to control this (enclosed tubes for example) are an important measure that should be required for the project.

The applicant has indicated that an Air Quality and Dust Control Plan and an Air Quality and Meteorological Monitoring Program will be established prior to the construction phase. The LTC urges the EAO to require that both plans be submitted for review prior to approval of the project, and that they also include information on what steps the barging companies will take to prevent emissions while the gravel is in transit.

We also urge the EAO to require the applicant to include the full extent of the Regional Study Area in both the Air Quality and Dust Control Plan and the Air Quality Monitoring Program.

Noise Issues

While there are many concerns related to the environmental impacts, in terms of quality of life for neighbour, noise is probably the biggest concern. What is proposed is a gravel crushing and loading facility that will emit industrial noise. A number of matters seem problematic with the study:

- i) The EAO is unable to know from the information provided if account was made of the fact that sound travels over water in a far different manner than it does over land especially in the absence of wind which is a frequent occurrence in the summer months in this part of Howe Sound. In addition, it is not clear if calculations took into account the fact that the project will be take place in a valley surrounded by mountains reflecting sound.
- ii) The study prepared concludes that the impact will be “negligible”, which is defined as <3Db change from the Ambient Sound Levels. The ASLs for the receptor NR4 at Camp Latona are lower than at other receptors and a change in sound would likely be more noticeable. Likely, most levels of Low Frequency Noise and High Annoyance Noise will have an impact on the remote experience for landowners and visitors to this area.
- iii) Decibel levels do not reflect that fundamental change in the experience of the environment. The baseline study recognizes that, with very limited exceptions, current ambient noise is from birds, water flowing, wind, and waves. Natural sounds that are one of the reasons people come to this area to experience nature. If that background sound is replaced instead with industrial noise, it will completely change the nature experience.

In this instance, we believe that the EAO require a separate independent study related to noise effects, where the actual noise of the facility is simulated and the effects measured in a variety of weather conditions in a variety of locations.

We are also concerned with the noise that will emanate from the barge loading as this will occur beyond any barriers. The chances of this producing unsatisfactory noise, in our view, is great and there appear to be no “noise deadening” measures proposed beyond raising or lowering the conveyor belt. We propose that some method of deadening the noise of gravel entering a barge should be a condition of any approval.

We are concerned as well that the berms placed around the processing facility are not high enough or extensive enough to contain noise from that facility and submit that the berms should be higher than piles of material and planted with sound absorbing vegetation such as large trees.

The facility should only emit noise while it is operating and thus the hours of operation are an important consideration. At present, the applicant indicates that it will operate during “daylight hours” which it defines as 7am to 10pm. We submit that to have the least impact on the surrounding communities, both operation and barging hours should be strictly limited to a 9am to 5pm period all year round and that no operations be permitted on weekends or statutory holidays. The communities surrounding the proposed facility are most heavily used during summer months and on weekends. The EAO should also require the proponent to undertake the four-month construction phase between October and April when there are fewer recreational visitors in Howe Sound.

Visual Impacts

The study indicates that Viewpoint 5 from Camp Latona would be impacted by changes to the landscape, scenic character, and light at night. While the study assesses the impact as Low, account must be made for the impact such a change would have on the current use. Enjoyment of the natural viewscape is a key current use of Camp Latona, the Burrard Yacht Club outstation at Ekins Point, and the secured strip of shoreline park Crown land along the northern side of Gambier Island. We urge any approval to require sufficient tree cover to ensure that the operations are not visible from any of these locations.

We believe much of the light pollution issues would be addressed by limiting operations to occur during the hours of 9am to 5pm. We submit that this should also be the case for loading and barging as light pollution will emanate from that activity as well. We have been advised that when no operations or loading is occurring, there will only be minimal lighting on the water for navigation purposes and minimal lighting in the plant area. This should be a condition of any permit.

Community Concerns

The Gambier Island Local Trust Area includes a number of communities that are affected by this proposal. We submit that many of the concerns being expressed by those community members and by others stem from their experience of this area as a wilderness jewel that is not suitable for industrial development despite its history. There is no doubt that Howe Sound has a history of industrial use, but the resurgence of industrial use in Howe Sound is not consistent with the mandate of the Islands Trust.

While we appreciate that the applicant has taken some steps to ameliorate concerns relative to the environment, in the end the proposal is not consistent with the Local Trust Area's official community plans nor the Trust mandate to "preserve and protect the environment and unique amenities" of our Local Trust Area for the benefit of all British Columbia.

As a result, we urge:

- a) The EAO to recommend rejection of the proposal.
- b) Alternatively, to include in its condition or recommendations the specific points set out above.

Sincerely,



Susan Morrison
Chair, Gambier Island Local Trust Committee