



August 13, 2019

Herman Henning
 Chief Inspector of Mines
 Ministry of Energy Mines & Petroleum Resources
 c/o Mining Division - Southwest Region
 PO Box 9395 Stn Prov Govt
 Victoria BC, V8W 9M9

RE: Proposed Mining Permit in the Skagit Headwaters

Dear Chief Inspector Henning:

The 29 undersigned conservation, recreation, wildlife organizations and local businesses are writing in opposition to the proposed mining permit by Imperial metals in the Skagit River headwaters, located in southwest British Columbia. The Skagit River rises in the Cascade Mountains from wetlands, rivulets and tarns located on both sides of the 49th parallel, eventually flowing through North Cascades National Park and entering the Salish Sea in Washington State. This transboundary watershed is a treasure on each side of the U.S.-Canada border.

The Skagit River watershed is critical to the health and well-being of the region's residents and local recreation-based economies. This river and its tributary streams are located near the town of Hope, B.C. and within the traditional territory of a number of First Nations. B.C.'s current mining and logging threats are located in a 5,800-hectare "donut hole" of unprotected wildland sandwiched between Manning and Skagit Provincial Parks in British Columbia.

Last year, B.C.'s clear-cut logging in the area of unprotected wildland was allowed to scar the landscape with four new clear cuts before a growing international coalition worked towards postponing the sales. Currently, the B.C. government is looking for alternative locations for additional timber volume away from this pristine transboundary landscape.

However, now that Imperial Metals has applied for B.C. authorization to drill for gold in the donut hole, the proposed mine permit has exponentially increased the potential threats to the Skagit River headwaters.

Whether here in the Skagit region or elsewhere in B.C., pristine and intact headwaters, shared by multiple jurisdictions, is no place for mining. Such endeavors come with new road construction, deep core drilling, impacts to ground water, and risks of tailings spills and breaches affecting the water quality for fish, wildlife and drinking water. Acid mine drainage resulting from mining ore can leach toxic heavy metals such as copper, zinc, cadmium and others, which can be extremely harmful to fish and other aquatic life. Even a slight increase in trace amounts of copper above natural stream levels, for example, suppresses the ability of trout and salmon to smell, making it harder to avoid predators, find mates and return to spawning grounds.

Furthermore, the company putting forward the permit should not be allowed to mine in an area like the Skagit River headwaters. In 2014, Imperial Metals was responsible for the infamous Mount Polley mine disaster, which spilled more than 2.6 billion gallons of toxic sludge into Quesnel Lake and the Fraser River watershed, the biggest tailings dam failure in Canadian history. To date, the company has not faced charges.

The Skagit headwaters are made up of lush forests and clean clear water, which support an impressive diversity of **fish and wildlife**, including an important run of chinook salmon. The Skagit River is well-loved for its high-quality rainbow trout fly fishing opportunities. Wilderness habitats within the Skagit headwaters are required to recover B.C.'s North Cascade population of grizzly bears — the priority grizzly population for recovery in the province. More than 200 species of birds have been documented here, and the area contains important forest habitat for the endangered northern spotted owl.

Both Manning and Skagit Provincial Parks are major **outdoor recreation** destinations, just a day trip from the greater Vancouver metro area and draw more than a million visitors each year. Outdoor enthusiasts spend their money at local businesses en-route to recreation destinations, buying gas, eating at local restaurants, finding lodging, and purchasing supplies, gear and fuel for their day of hiking, fishing, rafting, kayaking, camping, biking, or horseback riding in these pristine areas. This economic activity fuels rural communities.

We ask you to deny Imperial Metals' proposed mining permit and focus your attention on working with the international Skagit Environmental Endowment Commission to secure lasting permanent protection for this important watershed from logging and mining. To that end, in 1984 a treaty was signed between the United States and Canada to resolve disputes over the High Ross Dam and to maintain the environmental integrity of the Skagit River watershed. The treaty created the Skagit Environmental Endowment Commission (SEEC) to conserve and protect wilderness and wildlife habitat, enhance recreational opportunities and acquire mineral or timber rights to facilitate long-term protection for the Skagit watershed.

The mining proposal in the Skagit headwaters is but one of a growing list of concerns around the lack of oversight of Canadian mining projects near transboundary rivers that originate in B.C. and flow into four U.S. states including Alaska, Washington, Idaho and Montana. These mining projects have real impacts on downstream watershed values such as clean water, salmon habitat and recreational and economic benefits to local communities.

We look forward to the day that the government of B.C., in partnership with First Nations, and downstream communities, can designate the Skagit River headwaters as a totally protected area, safe from the impacts of industrial logging and mining.

Sincerely,

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CC: John Horgan, BC Premier
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Doug Donaldson, BC Minister of Forests, Lands and Natural Resource Operations and Rural Development
George Heyman, BC Minister of Environment and Climate Change Strategy