



April 17, 2019

Letter sent via email

TO: SouthwestminesDivision@gov.bc.ca

CC:

Premier of BC premier@gov.bc.ca

BC Environment Minister ENV.Minister@gov.bc.ca

BC Forests Minister FLNR.Minister@gov.bc.ca

BC Mines Minister EMPR.Minister@gov.bc.ca

RE: Giant Copper/Imperial Metals application for a 5-year mineral exploration permit in the Donut Hole area adjacent to Manning and Skagit provincial parks.

FILE NUMBER: 0700195

The Wilderness Committee opposes [Imperial Metals' application for a 5-year mineral exploration permit in the Donut Hole area adjacent to Manning and Skagit provincial parks.](#)

We note that the Donut Hole area, which is fully within the Skagit watershed, is subject to the [High Ross Treaty](#) signed by Canada and the US which aims to protect the ecological health of the Skagit watershed by securing and extinguishing mineral tenure and preserving Skagit wildlands like the Donut Hole.

We say that the Donut Hole is unceded indigenous territory and land-use decisions here must comply with the [United Nations Declaration on the Rights of Indigenous Peoples.](#)

The exploration permit requested by Imperial Metals, if granted, would risk further degradation to grizzly bear habitat in the Skagit portion of BC's North Cascade Mountains.

The at-risk population of grizzly bears in the North Cascade Mountains is the [number one priority for grizzly bear recovery in BC.](#)

Recent clear-cut logging by BC Timber Sales within the Donut Hole has removed the old-growth forest cover around much of Imperial Metals' proposed exploration sites. As the new forest canopy grows up and closes in cutting off sunlight, berry production will decline. This will reduce a food source for grizzlies. And the negative impacts of new roads and increased fragmentation of habitat can only make grizzly recovery more difficult to achieve. The recently logged and roaded portions of the Donut Hole need to be restored with an eye to grizzly recovery and not subjected to even more industrial degradation.

The exploration permit requested by Imperial Metals risks further degradation of water quality within the Skagit Watershed with their proposed drilling and trenching. [There is some evidence to suggest that as a result of previous mine activity, Silverdaisy Creek now contains metals that potentially could be toxic to organisms.](#) There is research that shows arsenic, cadmium, lead and zinc, are accumulated in higher quantities in Silverdaisy Creek compared to the upper Skagit River. Because of its suitable habitat for spawning and rearing, Silverdaisy Creek water and biota may be a source of arsenic, cadmium, lead, silver, and zinc to Bull Trout and Rainbow Trout. Given that this area is surrounded by two provincial parks and is the headwaters of an extremely important international river system, the BC Ministry of Mines and the BC Ministry of Environment have a duty to investigate these research results to determine if they are accurate and if so to make a plan for clean-up, and not permit more degradation to occur.

The exploration permit requested in the Donut Hole by Imperial Metals applies to an area that does not require further exploration because [the land they are proposing to investigate has already been searched many times before.](#)

The general area of the proposed exploration sites is crisscrossed with old adits, abandoned mines and drill sites that have been constructed over the past 100 years. With respect to gold, which is the purported target of the proposed exploration, only low amounts of gold that are not sufficient for mine development have been documented in the Donut Hole after decades of digging and drilling. The Donut Hole's higher value is as an addition to the Manning and Skagit provincial parks.

The provincial government should work with the [Skagit Environmental Endowment Commission](#) to acquire and then extinguish Imperial Metals' mineral tenure in the Donut Hole. [Then in partnership with First Nations, the provincial government should protect the Donut Hole and the entire Canadian portion of the Skagit watershed from any further industrial degradation.](#)

Please do not grant Imperial Metals a 5-year exploration permit for the Donut Hole.

Sincerely

A handwritten signature in black ink, appearing to read 'J. Foy', with a long horizontal line extending to the right.

Joe Foy

Wilderness Committee Executive Co-Director