

B. C. TAP WATER ALLIANCE

**Caring for, Monitoring, and Protecting
British Columbia's Community Water
Supply Sources**

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August 14, 2004.

Attention: Bruce Reid,
Mines Inspector,
Ministry of Energy and Mines.

Regarding: AJB Investments Ltd. subsidiary SureSpan Bridges application for an aggregate extraction permit in the Chapman Creek Watershed Reserve

It is our position that the Ministry of Energy & Mines must reject the above application for a sand and gravel mining permit for two reasons. One, forest cover removal followed by sand and gravel extraction from the Chapman Creek Watershed Reserve is completely inconsistent with water quality objectives and therefore inappropriate for this critical public drinking water source with its well known instability and past impacts. Second, approval would set a dangerous precedent for other BC community and domestic watershed reserves and your authority to do so remains questionable within them.

During the provincial Aggregate Review Panel's public consultation and input sessions, the BC Tap Water Alliance presented a written submission on November 21, 2000 at the Abbotsford forum opposing the Ministry's ad-hoc policy. We provided comments specifically opposing future aggregate mining in the Chapman Creek Watershed Reserve (the submission is posted on our website).

As a result, the March 2001 final report of the Aggregate Review Panel, *Managing Aggregate - The Cornerstone of the Economy*, reflected our concerns by stating, repeatedly, that "the government should identify environmental values such as fisheries habitat, groundwater use and vulnerability, community watersheds, wildlife habitat, endangered, threatened and vulnerable species, etc. that would limit aggregate extraction at each location with aggregate resource potential." We would like to know to what extent the Ministry of Energy & Mines has reviewed the issue of community watersheds as a result of the Panel's recommendations.

Since the early 1970s, with the imposition of the Forest Service's policy of "multiple use", there have been numerous provincial task forces and committees, submission reports and correspondence by the mining sector, and government Briefing Notes on the issue of mineral staking, exploration and development in BC's community and domestic watersheds. Government records consistently indicate strong opposition to mining in community watersheds by both government health officials and the public, yet successive governments have failed to develop a policy that is constant with those concerns. 88 percent of Sunshine Coast voters opposed logging and mining in Chapman Creek during the May 2, 1998 Sunshine Coast Regional District

(SCRD) referendum. The SCRDr rejected the Integrated Watershed Management Plan and the draft mining 'guidelines' it contained as a result.

As stated in our August 4, 2004 letter to Assistant Deputy Health Minister Andy Hazelwood we note an oversight in the referral of the present application to other provincial Ministries. A referral was not made to the Provincial Health Officer's Drinking Water Protection Office on a matter that is clearly related to its new mandate. Given the substantial government review processes regarding the implementation of the *Drinking Water Protection Act* since January 2001 and the fanfare given its later passage, we are particularly concerned that there has been a lack of coordination between the Ministry of Energy & Mines and the Drinking Water Protection Agency, which is integral to the current application review process.

Sincerely, Will Koop, Coordinator.