



18 April 2019

re: **Imperial Metals application for a Multi-Year, Area Base Permit**  
**Referral Number: 109994684 - 011**  
**Reference Number: Ministry of Energy and Mines / 0700195**

The Federation of Mountain Clubs of BC (FMCBC) promotes self-propelled activities, such as hiking, mountaineering, trail running, snowshoeing and backcountry skiing through leadership, advocacy and education. We are a federation of 44 outdoor clubs with a membership of over 5,000 people from across the province. We engage with outdoor recreation organizations, government agencies, commercial operators and others to protect and maintain access for quality non-motorized recreation in BC's mountains and wilderness.

We write regarding Imperial Metals' application for a Multi-Year, Area Based permit to do exploratory work on their Giant Copper claims within the Upper Skagit River Watershed, also known as the "donut hole", an unprotected area, sandwiched between Manning Provincial Park and Skagit Provincial Park. We are opposed to the granting of a Multi-Year Area Based permit to Imperial Metals' for the following reasons:

1. Silverdaisy Peak has been a popular hiking and backcountry skiing destination for decades and is accessed via a trail that starts in Manning Provincial Park. With the high demand for outdoor recreation in Southwest BC, valuable wilderness recreation assets such as the Upper Skagit Watershed should be preserved.
2. The "donut hole" lands include spotted owl habitat in lower elevations and grizzly bear and mountain goat habitat in its upper elevations. This area needs to be fully protected, not subjected to 5 more years of industrial activity.
3. The proposed mineral exploratory work, if approved, will frustrate the mandate of the Skagit Environmental Endowment Commission (SEEC), a cross-boundary organization set up to monitor and protect the Upper Skagit River Watershed, which has sought to acquire the mineral claims within the "donut hole" and transfer the lands to the BC provincial park system. Granting the permit clearly conflicts with this intent and efforts.
4. The amount of work proposed in Imperial Metals application is very limited, but the time requested to undertake the work is up to 5 years. Should the application be granted, the period authorised for the work should be restricted to 6 months (one field season); and, the exploration results should be made available to both the Ministry of Energy and Mines and SEEC within 12 months of the issuance of the permit.

Further we further request that the BC government

- confirm that they recognise the mandate of SEEC in relation to acquisition of the Giant Copper property and work with SEEC to negotiate a purchase of the property;
- show concern for the potential environmental impact on the Skagit River by a company that, given the example of Mount Polley, does not have a good record on environmental issues;
- recognise the cooperative relationship between Canada and USA that is required by the High Ross Treaty on environmental issues; and,
- recognise the investment made by Seattle in investing in fish and wildlife projects in the lower Skagit River.

We conclude by asking that the Imperial Metals' application for a Multi-Year, Area Based permit to conduct mineral exploration in the "donut hole" be denied in the interest of maintaining the long-term goal of SEEC and BC Parks to incorporate the lands into our provincial park system.

Thank you for your consideration of our comments based on our thorough knowledge and history of this critical region.

Sincerely,

Barry J Janyk  
Executive Director  
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