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To: Revelstoke City Council

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Crown Land Tenure renewal for the Westside Road gravel pit.

Preamble: -

It is my understanding that the Licence of Occupation for crown land issued by ILMB to Interoute on the Westside Road Gravel Pit is due to expire on July 28th, 2013. I am submitting this letter to request that the City review and consider the below issues and concerns as to why the City should not give its approval of Interoute's application to renew their tenure:

On May 15th, 2008 the City Planning department sent a letter to ILMB stating that the City gives its approval and support for the expansion of the Interoutes Westside Road gravel pit, on the recommendation of this letter ILMB consequently granted Interoute a 5-year tenure. This was done without bringing the matter to the attention of council and stated the application can be supported without soliciting public input. One of the conditions was that the land tenure was not to exceed 5 years. This term has now Expired.

ILMB stated that they would not have granted crown land tenure if the City of Revelstoke had objected. So consequently it was the City's ultimate responsibility and due diligence to consider the health implications of Crystalline Silica dust. This should have been done prior to giving approval, and has led to a large gravel pit being located 300 meters from private residents.

The City of Revelstoke planning department far exceeded its responsibilities in granting approval and support to ILMB. The 5-year term should not be renewed. The health risks that we are exposed to from this gravel pit are directly due to the City's lack of public health concerns. What we are faced with is solely the responsibility of the City's Planning Department's negligence. We were told by the Planning Department that the noise and the Crystalline Silica dust would not be a problem. But, once the gravel pit was operational and the noise and dust became a serious issue the planning department **John J Guenther** stated that noise and dust was to be expected. If it was to be expected why did he omit to state that in his staff letter to council? He was made aware of the health risks associated with Crystalline Silica dust and he refused to include that in his staff letter to council.

The intent of this letter is to protect those who are already suffering with the effects of C.S. dust and to protect others from suffering from cancers associated with Crystalline Silica dust. Please Google www.carexcanada.ca/en/silica IARC's classification in 1997 of crystalline silica as a Group 1 carcinogen (*carcinogenic to humans*) is specifically for quartz and cristobalite silica inhaled from occupational sources.^[2] A recent IARC review of Class 1 carcinogens reaffirmed this classification.^[15] Epidemiological studies have shown a relationship between occupational exposure to crystalline silica and increased risk of lung cancer. Silicosis, a non-reversible fibrotic lung disease, is caused by the inhalation of crystalline silica particles.^[6] Silicosis is typically categorized as chronic (> 10 years exposure), accelerated (high concentrations over 5-10 years) or acute (short term exposure at high concentrations).^[5] Besides silicosis and lung cancer, occupational silica exposure has also been linked to pulmonary tuberculosis, chronic obstructive pulmonary disease, and autoimmune disease (rheumatoid arthritis).^[7,8]

The Land tenure should not be renewed due to the fact that the gravel pit operator's inability to be able to comply with the Mine permits conditions.

Mine permit # G-4-188 page 8 section 24 states that Dust originating from the mine site shall be controlled at the source. Dust shall not be allowed to impact adjacent private properties.

The condition that no dust to impact adjacent private properties has not been adhered to or enforced. Dust monitoring has not been active for over 2 yrs the only dust monitoring performed was in Nov. 2010 to March 2011. This was during the winter months when there was snow on the ground. I had these results reviewed by a Registered Professional Biologist whose specialty field is in mine reclamation and is a consultant for the Ministry of Mines. The RPB did not give the dust sample results any credibility, the only thing it did was to show a base line for future results, unfortunately Interoute did not continue dust testing.

When Greg Baytalan, B.Sc., C.P.H.I.(C), E.H.O. Air Quality Specialist Interior Health Visited the site and spoke to the pit operator in October 2012 he stated that it was impossible to operate a gravel pit with no dust!

It is the opinion of those that have been most adversely affected by the Crystalline Silica dust that the City of Revelstoke has failed both morally and ethically in all matters concerning this gravel pit.

Ref. the Public Health Act Division 6 — Local Governments Role of local government **83** (1) A local government must do all of the following: (a) if the local government becomes aware of a health hazard or health impediment within its jurisdiction, take an action required by a regulation made under section 120 report the health hazard or health impediment to a health officer, This has not been upheld

The Community Charter has also not been upheld to protect our health.

Community Charter [SBC 2003] CHAPTER 26 Part 2 — Municipal Purposes and Powers Division 1 — Purposes and Fundamental Powers Municipalities and their councils Fundamental powers 8 (3) A council may, by bylaw, regulate, prohibit and impose requirements in relation to the following: (g) the health, safety or protection of persons or property in relation to matters referred to in section 63 ***[protection of persons and property]***; (i) public health; The authority of a council under section 8 (3) (h) ***[spheres of authority — nuisances disturbances and other objectionable situations]*** may be exercised in relation to the following: (a) nuisances; (b) noise, vibration, odour, dust, illumination or any other matter that is liable to disturb the quiet, peace, rest, enjoyment, comfort or convenience of individuals or the public; (c) the emission of smoke, dust, gas, sparks, ash, soot, cinders, fumes or other effluvia that is liable to foul or contaminate the atmosphere;

The health of many of the residents of the Columbia Park that live adjacent to the gravel pit has been compromised from inhalation of the Crystalline Silica Dust that they are exposed to from this gravel pit. There are cases of children suffering with severe asthma, elderly residents suffering from acute COPD, chronic obstructive pulmonary disease, Long-term exposure to lung irritants such as air pollution, chemical fumes, or dust contribute to COPD. Rheumatoid arthritis, and many other medical problems all of which are linked to the inhalation of crystalline silica. Silicosis Respirable crystalline silica (quartz) can cause silicosis, a fibrosis (scarring) of the lungs. Silicosis may be progressive; it may lead to disability and death. Lung Cancer Crystalline silica (quartz) inhaled from occupational sources is classified as carcinogenic to humans. Tuberculosis Silicosis increases the risk of tuberculosis. Autoimmune and Chronic Kidney Diseases Some studies show excess numbers of cases of scleroderma, connective tissue disorders, lupus, rheumatoid arthritis, chronic kidney diseases when exposed to respirable crystalline silica. It is a long-term low-level exposure that is the most harmful. Google Silicosis or Crystalline Silica health effects

I have many pictures of the silica dust blowing off the Westside road gravel pit most of which are heading in a southerly direction over the Columbia Park sub division and

school. I would be glad to show them. Note I say silica dust and not Crystalline Silica dust as the Crystalline Silica, which is the most harmful, is unperceivable to the human eye without magnification. I have received and sent 1163 emails and had many phone calls regarding this gravel pit. I have received 12 FOI documents some taking 2 years to obtain containing hundreds of pages, and have done many hours of research which I will share this information with anyone from the City.

A question to ask yourself is: - Would you give this mine approval if it was asbestos being mined. ????

Yet the Ministry of Mines still permit asbestos to be mined!

I can only hope that the people making the decisions regarding this gravel pit do not have to suffer the depilating effects of Crystalline Silica.

Please Google and read [A Case for Why Silica Litigation Is Not the 'Next Asbestos'](#)

c.c. MLA Norm Macdonald
Ministry of Forests, Lands and Natural Resource Operations (Cranbrook)
Ministry of Mines
Revelstoke Times Review
Revelstoke Current