



northcolumbia environmental society

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Revelstoke City Council:

It has come to our attention that Interoute's tenure for the Westside Gravel Pit site has recently expired and that the company is expected to apply for a renewal of the same so that they can continue their operations. The NCES is submitting this letter to request that the City of Revelstoke not automatically give its approval of Interoute's application to renew their tenure, but rather use this as an opportunity to review and consider the below issues and concerns:

1. Reclamation Concerns

The land on which the Westside Gravel Pit is located is zoned as Rural Residential and is identified as a future growth area in the Official Community Plan. The conditions set out in Interoute's mining permit (Ministry of Mines Permit G-4-188 granted November 3, 2003 and amended October 15, 2010) requires that the surface of the land and watercourses shall be reclaimed to a "Forest" use and that the land must be re-vegetated to a self-sustaining state using appropriate plant species.

When City Council considered H&J Ready Mix's initial application for tenure on the site in 2003, Council stipulated that they would be supportive of the gravel operation proceeding under certain conditions. One of those conditions was that the tenure over the land not exceed 5 years. Land and Water BC Inc. subsequently issued a license of occupation for sand and gravel quarry purposes to H&J for a 5 year term commencing July 25, 2003.

The Reasons for Decision when the licence of occupation was renewed in 2008 specifically referred to the tenure being limited to a 5 year term as per the City's request so that future planning and land use considerations could be allowed. The Reasons for Decision also referred to Interoute being allowed to extract to a depth of 6.9m over the entire site so that the land can be appropriately reclaimed for other uses. Given the time that has elapsed since the previous renewal of the tenure, the NCES hopes that City Council will determine how deep the extraction has been to date and, if reclamation of any kind would still be possible if the operation were to continue for another 5 years. The NCES is concerned that continued quarry operations on this site will jeopardize the attainability of proper reclamation for the site. If this is the case, the operation should no longer be allowed to continue and the City of Revelstoke should not approve of Interoute being granted a renewed tenure over the land.

2. Time for Review of Mitigation Measures

The City of Revelstoke's Director of Planning sent a letter to the Senior Mines Inspector in July 2010 referring to Interoute's application to amend their existing Notice of Work and Reclamation Program at that time. This letter set out Council's resolution at the time that, while supportive of Interoute's application, requested that prior to granting any future extensions to the mine permit, the regulatory agencies consider and review Interoute's Dust Management Plan and Noise Plan and the success of the mitigation measures implemented.

The NCES believes that now would be a prudent time for the City to call on the regulatory agencies to consider and review the success of Interoute's Dust Management Plan and Noise Plan, as well as Interoute's adherence to these plans. This is particularly the case given that the Ministry of Mines and Forests have inadequately monitored the Westside Gravel Pit since the amended permit was granted in October 2010 and the level of contamination from this gravel pit to the City of Revelstoke remains unknown.

In Summary, the NCES feels that renewal of Interoute's tenure would jeopardize the City's long-term vision and goal for the subject property as well as the reclamation requirements set out in Interoute's mining permit. These concerns are in addition to the NCES' ongoing concerns regarding the health hazards and environmental dangers posed by the gravel pit's emissions of crystalline silica dust, a class 1 carcinogenic, which continue despite the conditions set out in the permit. Environmental standards for gravel pits are not stringent enough nor well enough enforced to protect our citizens or the natural environment. These concerns are even more pressing since an application was made in February 2013 by YCS Holdings for a new gravel pit near Westside Road just outside of the Revelstoke city limits.

Sincerely,



Sarah Newton
NCES Director



Jody Lownds
NCES Director

c.c. Revelstoke Mayor David Raven
Ms. Loni Parker
MLA Norm Macdonald
Ministry of Forests, Lands and Natural Resource Operations (Cranbrook)
Ministry of Mines (Cranbrook)
Revelstoke Times Review
Revelstoke Current