



June 18, 2013

David Rafael, Senior Planner  
SCRD  
Via email: David.Rafael@scrd.ca

Dear David:

Re: Changes to Bylaw 310.109 (Box Canyon).

This is a summary of concerns and comments that we expressed at the public hearing on June 11<sup>th</sup> regarding changes to Bylaw 310 that will rezone 62,500 square meters of the McNab Creek Valley from RU2 (Rural Two) specifically to allow for an Independent Power Project.

The mission of the Future of Howe Sound Society is: *to encourage the development of an overall comprehensive management plan for Howe Sound that recognizes and protects the social, economic and cultural value of this natural and beautiful environment.*

*Our purpose is to encourage, facilitate and serve as a liaison for community participation in developing a comprehensive management plan for the Howe Sound region involving local communities, First Nations, local, regional, provincial and federal governments and other interested parties.*

On April 13<sup>th</sup>, 2013 140 people representing 65 organizations with an interest in Howe Sound came together at the Future of Howe Sound Forum held in West Vancouver. Invitations were sent to all organizations and members of the various levels of government connected to Howe Sound. The intention of the Forum was to bring community, business and non-profit sector leaders together at the Gleneagles Golf Club for the Future of Howe Sound Forum to discuss a common vision for Howe Sound.

The Forum was a resounding success and our expectations were far exceeded. The organizations were represented included the film industry, tourism, forestry, mining, the marine industry, the arts, conservation interests, marine sciences, youth camps, education and recreation. We were pleased that Director Lorne Lewis and Mr. Steve Olmsted Manager of Planning and Development for the SCR D were able to participate. It was unfortunate however that the event conflicted with another conference that prevented additional members from the SCR D attending.

Mr. Olmsted, provided an excellent overview of existing plans that govern Howe Sound. It has been noted that the McNab Valley is an area where there is a gap in planning as it does not fall within any Official Community Plan. We have learned about development of the Sea to Sky Land Resource Management Plan. We will be formally requesting the SCRDC to move forward with closing the gaps in planning for the McNab Valley and we intend to convene another Forum for Howe Sound stakeholders later in the year.

Attendees at the Forum shared common values for Howe Sound and the consensus was that proper planning is extremely important. Attached are documents that include the notes and outcomes from this meeting.

From the afternoon's round table sessions there were three common objectives that arose from all those in attendance. Namely:

1. To actively participate and collaborate with all key players, including youth in the development of a comprehensive land and water use plan that is sustainability focused and science based.
2. To actively engage our members by building awareness of the issues regarding Howe Sound.
3. To engage in the development of a plan that protects a holistic healthy ecosystem and continues to provide a natural community for future generations of families while preserving the pristine wilderness in harmony with nature.

Those that attended support the concept of a plan that takes into consideration the marine and terrestrial environments and considers Howe Sound as a whole. There is momentum building towards a planned future and the Future of Howe Sound Society intends to continue encourage proper planning and a full understanding of cumulative impacts of projects and development in Howe Sound. We have heard that by speaking with one voice and articulating a vision for Howe Sound is the best way forward.

The proposed rezoning of 53.7 hectares of land within the McNab valley is changing a fundamental change to the character and permitted usage of this area without consultation of those that may be impacted, and without the project analyzing its cumulative impact on the region. The Rural Zoning this land is currently zoned as has been the "best use" of the land to this date. The recommendation to change the zoning to allow for the construction and operation of a power plant requires the rezoning of this land to industrial. We feel that by changing the "best use" of this land without consideration of the future potential of this valley and the impact of this power plant on the river valley, and the region as whole is premature.

**The Future of Howe Sound does not support the rezoning from rural to industrial at this time until proper analysis and consultation that meets the three objectives is completed.**

Industrial developers consistently reference past industrial use of the McNab Creek Valley to justify their proposed future use of this area. However there are different forms of industry and clarification of the term “industrial use” is required to ensure that any impact to the environment is sustainable and fits with the overall objectives of the region.

McNab Valley has been repeatedly logged in the past and there is evidence of remediation efforts in the form of a spawning channel that has been less than successful. This type of usage is classified as a Primary Industry generally associated with the extraction of natural resources directly from the Earth, including farming, mining, and logging.

On the other hand, aspects of the industry now proposed for the McNab Valley are classified as Secondary Industry and involve the construction of long term facilities for the processing of raw products derived from primary industrial sources (ie. power generation, gravel sorting, and rock crushing).

The previous use of this area for Primary industrial usage should not be considered as justification for the proposed introduction and potential future growth of long term Secondary industrial development in the McNab Creek Valley.

If Primary logging activity was truly comparable with the Secondary processing of raw materials then virtually all of the Crown Land on the BC Coast would need to be rezoned for “Industrial Use” and the end result would potentially devastating to the natural environment in British Columbia.

**The Future of Howe Sound Society believes the McNab Creek Valley should be maintained in its current Primary natural state and not developed at this time for Secondary industrial use until a full assessment and plan for the region has been developed and approved.**

#### Public and Stakeholder Information Process:

The long term cumulative effects of proposed projects for the McNab Valley are of growing concern. This IPP, ongoing logging of the area and a proposed gravel mine threaten the valley and threaten the enjoyment and the economy of the surrounding areas currently being used for recreational and commercial use.

These projects have many implications for property owners in the region. The volume and level of detailed information regarding the Burnco Aggregate project and the IPP needs adequate time and resources to be fully considered. . A public hearing that changes the zoning of this land from rural to industrial, only one month following an information meeting by the proponent is not adequate time.

**Future of Howe Sound Society believes SCRD could improve the possibility of property owners at McNab Estates and other interested stakeholders being able to attend meetings by holding meetings on a day of the week that has a late ferry schedule. 7:00 p.m. public hearings on a day of the week where the return ferry is at 8:30 limits participation by those that need to travel to and from by ferry.**

**Any proponent applying for rezoning changes that have potentially broad impact on Howe Sound should be required to hold a public information meeting in Vancouver attended by an SCRD official to allow for property owners to participate after first reading and prior to third reading of the re-zoning bylaw.**

Impacts to Wildlife:

We recommend the SCRD not approve this bylaw based on the inadequacy of substantiated information provided regarding compensation for loss and of and affects of and impacts on wildlife habitats and cumulative impacts on the region. Based on the values of those attending the Forum, recovery of wildlife and fish in Howe Sound is a high priority. Taxpayers have spent millions towards this recovery and a cost analysis and business case should be made that takes into consideration all of these past costs and future benefits. Enabling a project that detracts from the continued recovery of fish in this valley at a time when fish habitat and wildlife, need to be protected for future generations.

There are unanswered questions and inconsistencies in the information provided by the proponent regarding Grizzly populations, and how the proponents will ensure the fish populations will be improved in Howe Sound through the proponent's actions.

**The Future of Howe Sound Society believes third reading of the bylaw should not proceed based on loss of fish and wildlife habitat and potential harm to species that are being reintroduced to this valley together with cumulative impacts to Howe Sound.**

Removal of the requirement for the Variance within the Riparian Areas:

We understand this change is to remove "redundancy" of a separate process the applicant would need to go through to apply for an SCRD Variance Permit. The rationale being that the standards and reviews performed by the Provincial and Federal regulators are rigorous and adequate. This change removes all power of the SCRD should it not agree with those of the Provincial and Federal Governments whose priorities and resources might not align with those of the SCRD.

**The Future of Howe Sound Society believes the SCRD should retain the power to require a DVP.**

Monitoring and enforcement of the re-zoning permit:

This location of the Box Canyon Hydro project is accessible only by water and roads that traverse private land. You have said the SCRD has limited resources and will not be monitoring the project. The SCRD will be relying on the proponent and the resources of provincial regulators and reports from the public. If the SCRD is to depend on the stewards of the land to report, how does the public access the land in order to monitor the project?

**The Future of Howe Sound Society believe the SCRD should not approve the rezoning of this land and construction of the power project unless it has the resources to access the project to monitor and provide public reports on compliance.**

SCRD Bylaws

The proponent states that no services are required of the SCRD.

**Should the rezoning go forward, the Future of Howe Sound Society believes there needs to be bylaws in place, to protect the habitat of the McNab Valley regarding limiting limit noise, light emission, and hours of work that will be enforced.**

Thank you for considering these concerns in your report to the SCRD board.

Yours truly,

Ruth Simons,  
Executive Director,  
Future of Howe Sound Society  
c/o Box 465  
Lions Bay, B.C.  
V0N 2E0