

June 6, 2016

**Via Email [Brian.Kukulies@gov.bc.ca]**

Brian Kukulies, RPF  
Land Officer  
Ministry of Forests, Lands and Natural  
Resource Operations  
Sunshine Coast Resource District  
7077 Duncan Street  
Powell River BC V8A1W1

Dear Mr. Kukulies:

**Re: Crown Land Tenure Application No. 2411606**

We, Save Desolation Sound Society (**the “Society”**), write in regard to the above-noted Crown Land Tenure Application (**the “Application”**) submitted by Lehigh Hanson Materials Limited (**“Lehigh”**) to the Ministry of Forests, Lands and Natural Resource Operations (**“MFLNRO”**) on April 21, 2015 for a License of Occupation (**“LOO”**) in the Lloyd Creek area, located in Homfray Channel, Desolation Sound.

We understand that Lehigh has applied under the *Land Act* for a LOO to use and occupy Crown land for the purposes of carrying out exploration surface drilling to assess the potential for commercial aggregate production (**the “Proposed Activities”**). Given a favourable outcome to the Proposed Activities, Lehigh anticipates the area could be developed into a fully operational mine. According to Lehigh’s Notice of Work filed with the Ministry of Energy and Mines on April 21, 2015 (**the “Notice of Work”**), the area has been previously scouted for sand and gravel and first estimations are that 50 to 70 million tons of aggregate could be available on the site.

We also understand that the Proposed Activities will involve 122 hectares of land, cutting timber and a significant sonic drilling program consisting of 22 drill holes. The Proposed Activities would be conducted Monday to Sunday from 7:00 am to 7:00 pm and the required drilling equipment will include drilling and supporting track rigs, drilling pipes, maintenance equipment, portable fuel tanks and generators. The Notice of Work provides that the Proposed Activities will also include the construction of access roads, trails, heli pads, air strips and boat ramps.

For a number of reasons, the Society is strongly opposed to the carrying out of the Proposed Activities and the possible creation of this operating mine, and is hereby providing its comments on the Application pursuant to section 33.1 of the *Land Act*.

We, the Society, represent a group of concerned citizens, local residents, outdoor enthusiasts, businesses and other people.

The Desolation Sound area, and in particular the neighbouring Desolation Sound Marine Provincial Park (**the “Park”**), are popular tourist and recreation destinations. The unique environment of the area includes spectacular fjords, mountains and the warmest waters north of the Baja Peninsula.

Prideaux Haven is one of the Park's three major anchorages and one of British Columbia's premiere nature tourist boating and kayaking destinations. Lloyd Creek and the area of the Proposed Activities are clearly and directly visible from Prideaux Haven.

Not only will the Proposed Activities negatively impact the natural beauty and peaceful atmosphere of Desolation Sound by altering the natural topography of the land, waterbodies and native vegetation and wildlife, they will also negatively impact tourism and recreation in the Desolation Sound area, and in the neighbouring Park. Operating activities and increased road, air and marine traffic to support these activities would introduce noise and light pollution in an area that is otherwise devoid of such pollution and known internationally for its peaceful and still atmosphere.

The Society is aware that the decision to be made with respect to this Application must be informed by the Crown Land policies, and in particular the policy on Aggregate and Quarry Materials applications and the general Crown Land Allocation Principles. In our submission, the Application is not consistent with those principles and policies. The Crown Land Allocation Principles state that Crown land values are to be "managed for the benefit of the public". In our view, the public benefit of Desolation Sound Marine Park extends far beyond its boundaries, as many British Columbians are deeply attached to this area of unspoiled beauty, and place great value on its protection and preservation.

Another of those Principles is that "Economic, environmental and social needs and opportunities are identified and supported." The Application speaks to the economic needs of the Applicant, but the Proposed Activities would be adverse to the environmental and social needs of British Columbians. Those environmental and social needs are long term and significant; in our view they far outweigh the possible short-term economic benefits of the Proposed Activities. The policy that Crown land allocation should support healthy communities should, in this case, be applied with the understanding that the 'community' of those who care about Desolation Sound is not defined by a small geographic area, but is a community of British Columbians from throughout the province.

The Society is also concerned that a number of stakeholders who might be opposed to the Proposed Activities are not aware of the Application. We understand it is the responsibility of the government to inform stakeholders, including First Nations; the Crown Land Allocation Principles state that allocation should recognize the interests of First Nations and that allocation should consider the need to achieve greater reconciliation with First Nations. Thus we are perplexed by the apparent lack of consultation on the Application. We are, therefore, in the process of ensuring that other interested parties are made aware of the Application. We have set up a website and plan to hold an information meeting to inform other interested parties and stakeholders.

In summary, the Society is strongly opposed to the Proposed Activities, and hereby objects to the Application and to any other Lehigh application for a LOO or any other *Land Act* tenure in respect of the Proposed Activities. We ask that you inform us of the timeline for consideration of the application; please send that information to: [info@savedesolationsound.com](mailto:info@savedesolationsound.com).

We welcome the opportunity to discuss the issue with you in more detail.

Kind regards,

---

Bill Sinclair

**SAVE**  
*Desolation*  
**SOUND**

Director, Save Desolation Sound

---

Russell Hollingsworth

Director, Save Desolation Sound