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Referral Reference: Record Ridge Industrial Mineral Mine Project

FN Consultation ID: 410314

Consulting Org Contacts: Jerahlene Matibag (Administrative Assistant); Tracy James (Executive Project Director); Bailey Spiteri (Project Assessment Officer); Kathie Wagar (Regional Director)

Consulting Organization: Environmental Assessment Office (EAO); Energy, Mines and Low Carbon Innovation (EMLI)

Date Received: May 3, 2024

May 07, 2024

Weyt-k (Hello),

Subject: Record Ridge Industrial Mine Project: Correspondence from the EAO to Shuswap Band

On behalf of the Shuswap Band, we are writing to formally respond to the request issued by the Environmental Assessment Office (EAO) regarding an analysis under Section 11 of the Environmental Assessment Act pertaining to the review of Record Ridge Industrial Mineral Mine Project to designate as a reviewable project. We wish to advise the Environmental Assessment Office that the Shuswap Band is not in support of the Record Ridge Industrial Mineral Mine Project at this time. Additionally, we wish to share with the Environmental Assessment Office that the Shuswap Band has undergone a review process through the Ministry of Energy, Mines and Low Carbon Innovation regarding Record Ridge with concerns being identified and brought forward within that response.

The following comments are in regards to Shuswap Bands governance role in relation to the area affected by the proposed project: The proposed project (Record Ridge Industrial Mine) falls within Shuswap Band's Caretaker Area and within the greater Secwépemcúlecw (Secwepemc Traditional Territory). As land users and stewards, Shuswap Band members continue to exercise their Section 35 Aboriginal rights as their ancestors have done for generations, including hunting, trapping, gathering, and fishing, along with rights associated with spiritual and cultural traditions that are practiced in accordance with Secwepemc customs, laws, and governance structures. Secwepemc share an obligation of caretaker responsibility (stewardship) which is to act mindfully, learning from and caring for surrounding ecosystems for the health and survival of future generations, as is their Indigenous right (UNDRIP, Bill 41, Bill C15) Secwepemc culture hinges on the belief that the land responds positively to care and

respect, and that tmicw (the air, lands, and resources) is interconnected at a watershed level. It is therefore critical for Shuswap Band to be actively engaged and consulted on all developments occurring within their Caretaker Area.

Environmental Impacts of Interest

- **Asbestos Presence:** Asbestos exposure due to mining activities, particularly tremolite and chrysotile asbestos found in veinlets. Regardless of content levels, any activity that could aerosolize asbestos poses a risk.
- **Acid Rock Drainage and Metal Leaching:** The possibility of acid rock drainage (ARD) and metal leaching from mined rock is a concern, given the potential environmental impacts on water quality and aquatic life.

Cultural and Ecological Impacts of Interest

- **Sheep Creek (Salmon and the Columbia River):** The Record Ridge Industrial Mine Project project is located in an area of cultural and ecological significance to the Shuswap Band. Concerns exist regarding the impact on Sheep Creek, which is downstream from the Columbia River and significant for salmon rehabilitation efforts. The project's proximity to sensitive areas has potential to affect water quality and local ecosystems, impacting traditional practices of importance.
 - The Columbia River is deeply integral to the Shuswap Band, serving as a crucial source of sustenance and a site of cultural and spiritual significance. It supports diverse ecosystems and is central to community gatherings, traditions, and ceremonies. The health of the river is directly tied to the well-being of these communities, emphasizing the need for its sustainable management and protection.
 - Salmon are especially significant to the Shuswap Band, not only as a vital food source but also in cultural and spiritual realms. The annual salmon runs are celebrated events that reinforce teachings about nature's interconnectedness and responsibility. With salmon populations threatened by overfishing and habitat loss, efforts to restore and manage these resources sustainably are critical, highlighting the importance of environmental stewardship and indigenous rights in maintaining cultural continuity.

Identified Concerns (Impacts of Interest) brought forward to BC Ministry of EMLI within previous review process response applicable to Record Ridge Industrial Mineral Quarry (0500006)

- Air quality issues are likely due to extraction, processing, stockpiling and transportation of ore, as well as from exposed ground. Airborne and settlement issues can potentially

effect vegetation, wildlife, and water, and should be mitigated to prevent impacts to the local environment.


- Higher levels of quarry related constituents and sediment are anticipated in site sediment ponds. There is potential for these to impact fish and fish habitat if levels are not mitigated before reaching receiving natural streams therefore, they need to meet water quality guidelines before being released.
- Mining activities will remove species at risk and native vegetation that could be used by the Shuswap people for food (eg. berries) or medicine, but it also opens the potential for invasive weeds to become established in otherwise pristine ecosystems. Invasive weeds need to be managed, and reclamation of the project site should consider the plant and wildlife species that are significant to Shuswap and support traditional activities.
- There are general concerns over the impacts to wildlife that can result from expanding industrial activities into wildlife habitat areas. These include added human pressure, sensory disturbances, and direct impacts to habitat. Site activities must be mitigated to ensure wildlife is not impacted, and reclamation plans should consider wildlife requirements.

We request that all project updates and developments be promptly shared with the Shuswap Band to ensure transparency and ongoing dialogue.

Please provide updates and communications with the Shuswap Band through Nations Connect (CKK Portal).

We trust that our decision and concerns brought forward will be addressed and that we can continue to engage in constructive discussions to achieve sustainable development that honors our cultural heritage and environmental responsibilities.

Kukwstsetsemc (Thank you).

Barb Cote
Kúkwi7 (Chief), Shuswap band 

"Our people are our strength. Our children are our future."

cc: Mark Thomas - Councillor, Shuswap Band
Richard Martin - Councillor, Shuswap Band
Manon Moreau – Director, Territorial Stewardship, Shuswap Band
Rob Diaz – Consultation & Engagement, Shuswap Band
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Travis Yeats – Referrals Coordinator, Shuswap Band