



**FRIENDS of
CORTES ISLAND**
For nature, for people, for life

PO Box 254
Mansons Landing
BC, V0P 1K0

May 21st 2026

To: Ministry of Mining and Critical Infrastructure

Re: Cortes Island Quarry, Mine File 1610613

Friends of Cortes Island wishes to formally object to the proposed expansion of Cortes Island Quarry by the applicant 2385425 Alberta Ltd (operating locally under the business name of Island United).

We are deeply concerned that the proposal will cause significant harm to nearby sensitive ecosystems, namely riparian and wetland habitat and fish-bearing creeks. It will also result in the direct loss of a sizeable area of associated forest habitat.

In addition, we are very concerned that the application has been submitted without a comprehensive environmental impact assessment or any meaningful mitigation measures. As such, we respectfully ask the Ministry to reject the proposal in its current form. Please see our comments and recommendations below.

Stream, Riparian and Wetland Habitat

The proposed quarry extension will directly impact the headwaters of James and Hume Creeks, both of which are fish-bearing watercourses. James Creek supports Coho Salmon and Coastal Cutthroat Trout (a blue-listed species of special concern), while Chum Salmon spawn in its lower reaches. Coastal Cutthroat Trout are also present in Hume Creek.

The proposal will also impact associated areas of riparian and wetland habitat. Both are identified as sensitive ecosystems, meaning they are of conservation importance, fragile, and particularly vulnerable to development pressure. These ecosystems not only support a range of characteristic plants and animals, but also play an important role in maintaining hydrological function and water quality.

As such, we believe the proposal has the potential to cause:

- Direct damage to riparian and wetland habitat, and creeks present
- Sedimentation of creeks resulting from quarrying activity, including gravel washing, leading to the potential smothering of spawning habitat and harm to fish, amphibians, and aquatic invertebrates;
- Reduced water quality through contaminants leaching into creeks and wetlands, altered pH, and increased turbidity. In particular, we note the proposed concerning use of herbicides, on-site fuel storage, and the use of Portland cement (primary ingredient limestone) for the proposed concrete plant;
- Long-term hydrological changes, including impacts to groundwater levels, drainage patterns, and seasonal water retention, which could exacerbate existing low-flow conditions associated with climate change and negatively impact the creeks, wetland and riparian habitat.

We also wish to draw your attention to concerns submitted to you by Cortes Island Streamkeepers, who have extensive knowledge of the area, and have been actively monitoring fish populations and undertaking salmon habitat restoration work in James Creek - supported by the Department of Fisheries and Oceans Canada.

Forest Habitat

The quarry extension would result in the direct loss of approximately four hectares of second-growth forest, including removal of topsoil and exposure of underlying rock. This forest habitat is likely to provide food, shelter, and breeding habitat for a range of species, including birds, mammals, amphibians, and invertebrates. The site also forms part of a broader wildlife corridor extending from Carrington Bay to Gorge Harbour and beyond.

We believe the proposed impacts are likely to include:

- Direct loss and fragmentation of forest habitat;
- Harm to associated wildlife species and ecological connectivity;
- Disruption of the wildlife corridor;
- Increased runoff, warmer creek temperatures, and reduced groundwater retention.

Context and Relevant Policy

Cortes Island is widely recognized for its exceptional natural environment, including its intact forests, wetlands, streams, and interconnected ecosystems, all of which contribute significantly to the Island's ecological integrity, biodiversity, and long-term sustainability.

Protecting these natural assets has long been identified as a core community value and planning priority. As a local environmental organization, Friends of Cortes Island works to support the long-term protection and stewardship of these ecosystems for the benefit of both current and future generations.

It is important to note that the Cortes Island Official Community Plan (OCP), which provides guidance for the long-term development of the Island, states the following within Section 301 – *A Sustainable Future*:

“Much of the attraction of Cortes Island lies in its natural beauty. In order to maintain the attractiveness of Cortes Island there must be as little deterioration of the natural environment as possible.”

The OCP further states:

“Commercial development is supported on Cortes when it is tempered by societal and environmental values. Consistently there has been an expression of a desire for small scale economic development that ‘fits.’ The viability of this type of economy and its sustainability will be a central development for the Island in the future.”

In our view, the scale and nature of the proposed quarry expansion is inconsistent with these guiding principles. While we recognize the importance of local aggregate supply and acknowledge that the location is zoned F1–Forestry, the proposal represents a significant intensification and expansion of industrial activity within a sensitive natural area that includes fish-bearing creeks, riparian ecosystems, wetlands, and connected forest habitat.

Given the significant potential impacts identified above – including the loss of forest habitat, risks to water quality and hydrological function, and harm to sensitive aquatic ecosystems – we

are opposed to the proposed expansion in its current form. We are particularly concerned that the proposal appears to prioritize industrial expansion without adequately demonstrating how environmental impacts will be avoided, minimized or mitigated in a manner consistent with the environmental values and long-term sustainability objectives set out in the Cortes Island OCP.

Environmental Impact Assessment

Further, we are very concerned that the Aggregate and Quarry Management Plan has been submitted without a comprehensive Environmental Impact Assessment (EIA), despite the proposal having the clear potential to cause significant and long-term environmental impacts to sensitive ecosystems and hydrological systems.

The environmental information provided within the application is minimal, lacks sufficient technical detail, and is inadequate to properly assess the full extent of potential impacts. In particular, there appears to have been insufficient assessment of the potential effects on fish-bearing watercourses, riparian and wetland ecosystems, groundwater hydrology, water quality, and associated forest and wildlife habitat.

We are also concerned that the application does not provide any meaningful mitigation, monitoring, or restoration measures proportionate to the scale and sensitivity of the proposed development. Without this information, it is not possible to determine whether impacts can be effectively avoided, minimized, or remediated over either the short or long term.

Given the ecological sensitivity of the area and the significant concerns identified above, we believe a thorough and independent Environmental Impact Assessment should be required prior to any further consideration of the application, prepared by qualified environmental professionals. This should include:

- Detailed hydrological studies within the James Creek and Hume Creek watersheds, and assessment of impacts on groundwater, drainage patterns, and seasonal water flows;
- Assessment of impacts to fish habitat, fish populations and aquatic ecosystems, including sedimentation, pollution and water quality risks;
- Comprehensive ecological assessment of riparian, wetland, and forest ecosystem impacts;
- Evaluation of cumulative and long-term environmental effects, including those associated with climate change and drought conditions;
- Detailed mitigation, monitoring, and restoration plans

In the absence of this work, we do not believe the Ministry has sufficient information to adequately evaluate the environmental risks associated with the proposal. As such, we respectfully request that the application be rejected in its current form, that the proposal is significantly scaled back, and that the proponent be required to undertake a comprehensive Environmental Impact Assessment before the application proceeds further.

Finally, we have been very disappointed by the lack of consultation with the community, and ask that any further submission by the proponent is done in full consultation with local people.

Yours faithfully



Helen Hall
Executive Director
On behalf of Friends of Cortes Island Society