



## Grasslands Conservation Council of British Columbia

Box 3341, Kamloops, BC V2C 6B9

[www.bcgrasslands.org](http://www.bcgrasslands.org)

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July 28, 2023

File 10100-20/PPOS

Honourable Josie Osborne,  
Ministry of Energy, Mines and Low Carbon Innovation  
PO Box 906, Station Provincial Government  
Victoria, BC, V8W 9E2

Dear Minister Osborne:

The Grasslands Conservation Council of BC (GCC) is a provincial non profit dedicated to the conservation of our grasslands that cover less than 1% deeply of the province and have very high ecological and social values that will likely become even more important with climate change.

The GCC is extremely concerned about the proposed W.H.Y. Resources mine on Record Ridge in the Rossland area. Grasslands are extremely rare in this part of BC and Record Ridge's grasslands represent the only known extensive high elevation grasslands in the West Kootenay.

Record Ridge is noted for the diversity of plant species, including Bitterroot, Lomatium species, onion grass, and numerous other species in a combination extremely rare in Canada. Botany BC and The West Kootenay Botanical Society have both held tours at Record Ridge highlighting the unique plant community that is cherished by locals and tourists alike.

In addition to the grasslands one of the few known existences in BC of the Mountain holly fern (*Polystichum scopulinum*) is located at Record Ridge. It is listed as threatened by COSEWIC ([https://www.sararegistry.gc.ca/virtual\\_sara/files/cosewic/sr\\_mountain\\_holly\\_fern\\_e.pdf](https://www.sararegistry.gc.ca/virtual_sara/files/cosewic/sr_mountain_holly_fern_e.pdf))

This mining project would destroy a significant portion of the Record Ridge plant community and impact much of the rest, thus destroying a highly valuable ecological asset for the region and BC as a whole. Years from now, when reclamation efforts are made, they may be able to achieve a perennial plant cover, but the current assemblage of species will be lost forever. Rare plant communities are special in and of themselves but are even more important as plant communities adapt to a changing climate.

The GCC sincerely hopes that the BC Government will look closely at the ecological values of Record Ridge before allowing mine development that will lead to the permanent loss of this plant community. If you would like to discuss these concerns further please contact our Executive Director, Mike Dedels, P.Ag. at [mike@bcgrasslands.org](mailto:mike@bcgrasslands.org).



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Yours in conservation

Bob Haywood-Farmer  
Chair, Grasslands Conservation Council of BC

cc: Kathie Wagar, Regional Director, Southeast, Ministry of Energy, Mines and Low Carbon Innovation