

May 30, 2024



Dear Honorable Minister Heyman,

Thank you for the opportunity to provide comment regarding the request for an environmental assessment of the proposed Record Ridge Magnesium Mine project near Rossland, BC, that was received by the BC Environmental Assessment Office on April 18, 2024.

Environment and Climate Change Canada (ECCC) is responsible for implementing the *Species at Risk Act* (SARA) for terrestrial species at risk. SARA is a key federal government commitment to prevent wildlife species from becoming extinct and to secure the necessary actions for their recovery. Responsibility for the conservation and protection of species at risk and their habitats is shared in Canada, with provinces and territories taking the lead for terrestrial species protection, conservation, and recovery. Mountain Holly Fern (*Polystichum scopulinum*) is listed as threatened under Schedule 1 of the *Species at Risk Act* (SARA). Provincial data indicates presence of Mountain Holly Fern just outside the footprint of the proposed mine. All identified occurrences of Mountain Holly Fern should be maintained and increased, per the recovery strategy. Information on the species' critical habitat and threats to species recovery and survival, including mining and mineral exploration, are described in the recovery strategy, available online: <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/recovery-strategies/mountain-holly-fern-2017.html#toc11>

ECCC is of the view that more up-to-date and accurate mapping of Mountain Holly Fern occurrences and suitable habitat in the Project area would be important to help inform the decision on whether to undertake an environmental assessment for the project.

ECCC requests to be informed if the proposed project is designated as reviewable, and an environmental assessment under the BC *Environmental Assessment Act* is undertaken.

Best regards,

Rachel Canham

