

Bulkley Valley Community Resources Board
Box 577
Smithers, B.C. V0J 2N0

April 17, 2008

Terry Pratt
Manager, Major Projects
Resort Development Branch
Ministry of Tourism, Sport and the Arts
510-175 2nd Avenue
Kamloops, BC, V2C 5W1

Re: Ski and Ride Smithers draft Master Plan Agency Comment Summary Sheet

Dear Terry:

The Bulkley Valley Community Resources Board (BVCRB) has reviewed the final Agency Comment Summary Sheet for Ski and Ride Smithers' draft master plan. In the covering message, MoTSA requested that we "confirm that your agency is satisfied that its comments/concerns will be appropriately addressed by the mitigations proposed and that it has no objections to the Master Plan being finalized with those mitigations being incorporated into it". The BVCRB feels unable to make that confirmation based on the contents of 4 of 8 points on the spreadsheet. We submit the following comments to explain our position:

- **Points 8 (CRA boundary), 9 (development of the Prairie), 12 (socio-economic assessment), and 15 (land use planning)** are adequately addressed.
- **Point 10 (public access)** – The SRS Commitment is that reasonable routes that will be open to the public *at all times* will be denoted in the Master Plan. Yet the public access plan refers to a route to the Prairie that will "remain open *until development in this location is approved.*" As has been pointed out to SRS in the past, there are both safety and aesthetic reasons that this route to the Prairie has been well-used historically; for some skiers in some conditions, it is the only route that they are able to use as the alternate is windy, narrow and can be icy. The public access plan also includes the possibility of future restrictions for the Trail to Town. The BVCRB cannot accept these restrictions, which violate the SRS Commitment. Furthermore, the public access plan states that public access to all areas will be permitted outside the resort's standard operating hours ("when lifts are open *etc.*") which raises the possibility of summer restrictions if the resort expands to an all-season resort. The public access plan should explicitly state that permanent public access will be maintained, year-round, except for agreed to restrictions in the CRA during winter operating hours.
- **Point 11 (water quality and quantity)** – The act of completing water research is an insufficient commitment in and of itself. In response to concerns raised by DFO, SRS has committed to "no impact to stream channel or stream flow downstream of development" which meets BVCRB concerns about water quantity. SRS also commits to "no impact to water quality and fisheries values *during construction.*" The BVCRB expects that commitment to last beyond the construction phase.
- **Point 13 (visual quality)** – The BVCRB re-emphasizes the response made in our comments on an earlier draft of the spreadsheet (Feb. 13 letter), i.e. that the Ministry of Forests and Range is not the proper channel through which to request an amendment to the LRMP on visual quality.

The VQO framework with which The Ministry of Forests and Range assesses visual quality was developed for cut blocks and roads and not for ski developments. Furthermore, the VQO framework does not address night time viewsapes. Thus, the LRMP amendment process should be followed to change the visual quality emphasis given to Hudson Bay Mountain.

- **Point 14 (mountain goats)** – the Ministry of Environment has raised the significant possibility that mitigation of impacts to mountain goats will be impossible. The BVCRB would like to see this possibility acknowledged and addressed in the SRS Commitment Description.

We would also like to point out that we raised several concerns about the **Trail to Town** (Feb. 27 letter to Tori Meeks) when it was part of a separate application process. As the Trail to Town has now been incorporated into the Master Plan process, these points should be addressed in the Master Plan. They are:

1. Timber Extraction – The Master Plan should specify the proposed access log-hauling routes for harvesting, and what Tenure will address roads outside of the CRA Tenure. Standards for any construction should be noted as well as clarification of longer-term liabilities for maintenance and deactivation of these logging roads.
2. Stream Crossings for Log-hauling and Trail – Long-term liability for maintenance of stream crossings, especially the Chicken Lake Creek crossing, needs to be addressed.
3. Cattle Control – The Master Plan should specify what cattle control measures will be implemented on the MoFR Grazing Permit at the bottom of the Trail to Town.

The BVCRB looks forward to signing off on a revised version of the spreadsheet that addresses the concerns expressed above.

Sincerely,

Adrian de Groot
Chair, Bulkley Valley Community Resources Board