

Bulkley Valley Community Resources Board
Box 577
Smithers, BC
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Nov 1, 2007

Ms. Terry Pratt
Manager, Major Projects, Resort Development Branch
Ministry of Tourism, Sport and the Arts
510-175 2nd Avenue
Kamloops, BC, V2C 5W1
Fax: (250) 371-3942

Dear Ms. Pratt:

Re: Community Resources Board Review of Ski and Ride Smithers Draft Master Plan, 2007

The Bulkley Valley Community Resources Board (BVCRB) has reviewed Ski and Ride Smithers' (SRS) Draft Master Plan (DMP) and has evaluated it with regard its consistency with the direction contained in the Bulkley Valley Land and Resource Management Plan (LRMP), the Bulkley Valley Sustainable Resource Management Plan (SRMP) and the Telkwa Landscape Unit Plan (LUP).

Broadly, we recognize the ski hill development will contribute to the Bulkley Valley's economic diversity and enhance the community's amenity base. We also are aware that development at the scale envisioned in the draft Master Plan holds potential for long-term socioeconomic and environmental impacts. In order to manage for such impacts, we encourage the proponent and the Ministry of Tourism, Sport and the Arts to engage the community in a meaningful, transparent and responsive way as the project unfolds by ensuring that the periods for review and comment regarding Public Consultation, are consistent with the MoTSA, All Season Resort Guidelines (ASRG).

As suggested at our October 26th meeting with MTSA, we have focused our comments on Phase 1 of the proposed development. We expect to comment further when more detailed plans for Phases 2 and 3 become available.

Visual Impact

The importance of Hudson Bay Mountain's scenic viewscape to the community is highlighted in all three plans, the LRMP, SRMP and LUP. Specific direction in the LRMP for the Ski Smithers sub-unit states, "any future process management must emphasis visual quality" The area in which development is proposed has the Visual Quality Objective (VQO) of Retention. The VQO gives direction to the degree of acceptable change from the natural appearing landscape caused by land-use alterations. Under the Retention VQO resource management activities may not be clearly visible to the average viewer, although discernible, and disturbances should appear to be from natural causes. A map showing the established viewpoints for visual impact analysis and strategies for meeting the VQO is contained in the Bulkley SRMP.

The SRS acknowledges visual concerns by noting that "visual quality, from the town of Smithers needs to be incorporated into future planning of the ski resort," yet provides only a projected view from the airport, and we do not believe this meets the emphasis given in the LRMP. In order to judge whether the retention VQO will be met under the proposed developments the BVCRB requires projected views from other key sites that includes all phases of the proposed development. This

information then needs to be presented to the residents of the Bulkley Valley for comment. If the retention VQO will not be met, SRS could apply for an amendment to the plans, which would require showing that there is broad public support for an amendment to the LRMP.

Also, a projected night view from the viewpoints that the proposed village is visible from would be very useful. Any future plans for night skiing should be referred to a public consultation process, as lit trails would affect visual quality.

Biodiversity

The LRMP states with regards to biodiversity in the Ski Smithers sub-unit “no facilities or motor vehicles will be operated on the grassy tundra portion of the prairie, west of the existing ski boundary”. Also, the adjacent Hudson Bay Mountain sub-unit has in its objective “maintain existing hiking trails and encourage commercial backcountry recreation” with access restricted to non-motorized trails. It was clearly not anticipated that commercial downhill ski operations would be conducted in this area. Pod E in the DMP is located in the area covered by the above direction, but there is no mention in their DMP of their plans conflicting with LRMP direction on this matter.

Public Access to Recreational Areas

In our review of the 2006 Master Plan, we expressed that public access to historically popular backcountry areas needs to be maintained. Reasonable routes that will be open to the public at all times must be denoted in the DMP. If the new trail to town is included in the CRA, public use of this trail by backcountry users in all seasons must be unambiguously permitted in the DMP and any future tenure issued for this area. This includes addressing uphill traffic.

The DMP lists a number of additional activities being proposed for the resort and notes that further planning will be required to determine suitable areas within the CRA for those activities. Many of the proposed activities have the potential for significant impacts on the local environment including wildlife habitat (eg. dog sled tours and a BMX facility) as well as on public access to historically used areas (eg. snowshoeing and backcountry excursions), yet the DMP provides no details that might guide the BVCRB in assessing the compatibility of the proposed activities with the LRMP. Thus, the BVCRB would like a formal approval process with public consultation to precede any expansion of ski hill activities beyond downhill skiing and snowboarding. Such a process should be included as a condition in the Master Development Agreement.

Controlled Recreation Area Boundary

The DMP involves a significant increase in the size of the CRA, much of which is not required in order for Phase 1 to proceed. We recommend that this revised CRA boundary be revisited during the 5-year Master Plan reviews and altered in the case that Phases 2 and 3 do not follow in a timely manner.

Mountain Goats

The Bulkley SRMP (Map 4) identifies key mountain goat habitat. The DMP does not adequately address how mountain goats would be impacted by their proposed development and how they would mitigate these impacts. We agree with the response of the Ministry of Environment to the DMP, with respect to the potential impacts to mountain goats and the need for further work on this issue.

Water

It is not clear that water quality and quantity for downstream water licence holders and fish stocks will be maintained if the proposed development goes ahead. Water quantity could be impacted by extraction of water for the residential developments, and water quality could be impacted by

discharge of wastewater into watersheds. These concerns need to be addressed as detailed in the response by the Department of Fisheries and Oceans with respect to this issue.

Socioeconomic and Environmental Impacts

Given that Phases 2 and 3 are illustrated in conceptual form only, it is important that the community be given an opportunity to review and comment on more detailed plans for post-Phase 1 development. In our review of the 2006 DMP, the BVCRB requested environmental and socio-economic assessments of the proposed development. The DMP includes a commitment by the proponent to environmental and socio-economic assessments prior to further development. These assessments, as well as an associated public consultation process, need to be framed in the Master Development Agreement as conditions that must be met prior to the government granting approval for the proponent to proceed with Phases 2 and 3.

Required LRMP Amendments

There is a document on the BVCRB website detailing the requirements for amendments to the LRMP; this has been attached for your reference.

Should you have any questions regarding our review of this development proposal, please feel free to contact me at 847-7737.

Sincerely,

Adrian de Groot, Chair
Bulkley Valley Community Resources Board

cc:

Eamon O'Donaghue, Manager – Client Services, Integrated Land Management Bureau

Attachment 1
Amendments to the Bulkley Land and Resource Management Plan:
Proponent Requirements and Considerations

The Bulkley Land and Resource Management Plan (LRMP) was approved in April 1998 and is intended to guide management of public lands and resources within the Bulkley Timber Supply Area (TSA). The LRMP was developed in accordance with provincial government policy for land use planning and reflects the “Consensus Management Direction” established by the Bulkley Valley Community Resources Board (BVCRB) and a team of government representatives in consultation with local government and First Nations.

Highlights of the Bulkley LRMP planning history include:

- The planning process was initiated in 1992, the LRMP approved in 1998, and landscape unit plans, excepting the Bulkley LUP, were completed in September, 1999;
- The plan had the consensus of the BVCRB, and enjoys wide-spread support within the community;
- The Bulkley TSA is unique in the Province, by virtue of having comprehensive landscape unit plans completed; and
- Government agencies, the BVCRB, and major forest companies are committed to implementation of the LRMP, and there is a spirit of cooperation to make the plan work.

Key roles of the BVCRB are to monitor the development, implementation and effectiveness of the LRMP and associated plans to ensure that resource development protects environmental and other resource values and that development provides the most benefits possible to residents of the Bulkley TSA; to review any proposed changes to the LRMP; and to cooperatively develop a new LRMP when the current LRMP expires. These roles require the BVCRB to reflect the range of value perspectives of the community and balance those diverse interests to guide land use decisions.

Although the LRMP is intended to be a living plan, it is important to note that the Consensus Management Direction was developed through an extensive community involvement process that required compromises on behalf of all participating resource sectors.

The requirements, as listed below, for amendments to the LRMP may be too onerous for well-intended comments from the public at large. The BVCRB does not want to discourage constructive suggestions, and encourages the public to submit their ideas or thoughts regarding the LRMP through letters to any Provincial agencies, or to the BVCRB directly.

If the BVCRB decides there is a need for an LRMP amendment to address concerns raised by Board members or the public, they will recommend that the Ministry of Agriculture and Lands consider amendments to the plan.

If the proposal for an amendment to the LRMP comes from an entity other than the BVCRB the proponent(s) for the change would be responsible for fulfilling the following requirements:

- The name(s) and address(es) of the proponent (s), affiliated organization(s), and consultants hired (if any) to collect data or to prepare the proposed amendment;
- A clear description of how the current LRMP is not meeting the needs of the particular resource value(s) in question;
- An explanation of efforts made to work within the LRMP framework to address the specific resource management concerns, or why this is not possible;

- New information, including the results of effectiveness monitoring, that shows the underlying technical assumptions in the current LRMP were incorrect or social choices of the LRMP are not being met, or that substantial new values or management issues have arisen that were not anticipated;
- A clear description of analyses of any data presented, the source of the data, and the methods used to collect the data;
- A detailed description of the proponent's proposed amendment(s) to the LRMP;
- If possible, provide names of persons or organizations that are considered experts on, or have significant interest in the amendment, and may be contacted for review or comment regarding the amendment; and
- Demonstrated support from a broad cross-section of the community to amend the plan;

If these criteria and information requirements are met, the BVCRB would consider recommending an amendment to the LRMP to the Ministry of Agriculture and Lands. Any amendment proposed by the BVCRB would have to be agreed to, and carried out by, the Minister of Agriculture and Lands.

For further information please:

1. contact any member of the BVCRB;
2. email your comments to Adrian de Groot (adriandegroot@bulkley.net);
3. visit the BVCRB website at www.bvcrb.ca;
4. or mail comments to Bulkley Valley Community Resources Board
Box 577, Smithers, B.C., V0J 2N0.