

Bulkley Valley Community Resources Board
Box 577
Smithers, B.C.
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October 23, 2006

Terry Pratt,
Manager for Major Projects
Tourism and Resort Development Division
145 Third Avenue 3rd Floor
Kamloops, B.C.
V2C 3M1

**Re: Ski and Ride Smithers Application for Master Plan Amendment
File 64007764**

Dear Ms. Pratt

In reviewing the Draft Master Plan submitted by Ski and Ride Smithers (SRS), the BV Community Resources Board has been guided by its mandate to ensure that developments on the landbase are compatible with the LRMP. Issues of compatibility that have been identified include: maintenance of biodiversity, wildlife conservation, water quality, visual quality and outdoor recreation. The LRMP, while not addressing socio-economic issues directly, was assessed by government for its potential socio-economic impacts. It is therefore incumbent on the BVCRB to consider the potential socio-economic effects of SRS's proposed Master Plan.

Our review of the draft Master Plan leaves us with a number of concerns and unanswered questions, especially:

- a) Environmental Assessment. The BVCRB finds it unacceptable that an environmental assessment is not required for a project of this size. This is a major expansion of the operations on the mountain, and a change of focus from a regional ski hill to a major year-round resort.
- b) Water and Sewer for the Proposed Village. Phase 1 has the capacity of approximately 3800 beds. The draft plan suggests Gully Creek and drilled wells as a water source. There is no information on flow studies, the alternatives if the wells are dry, and potential downstream effects, especially on other water users. There is also no information on sewage disposal methods or locations.
- c) Wildlife Habitat Assessment. SRS is being guided by the Preliminary Habitat Assessment from the previous owners, which reviewers at that time found to be inadequate, and has not undertaken any new studies. The old Preliminary Habitat Assessment needs to be updated and revised.
- d) Designation from Winter Use to Year-round Multi Recreation Use Resort. The Draft Plan envisages a multisport allseason resort. However, the impact of multiuse on the area has not been fully reviewed or explained. The addition of summer recreational activities such

as mountain biking, hiking, sightseeing and horseback riding will extend the footprint of activities well beyond the Controlled Recreation Area (CRA) and subsequently have a far greater impact on the environment than the ski-hill. These potential impacts need to be fully assessed.

- e) Socio-Economic Impact. In the absence of a comprehensible socio-economic assessment that includes social and economic costs as well as benefits, it is impossible to know whether this project is “good” for Smithers. Items such as upgrading the Hudson Bay Mountain road, the increase in traffic, additional power requirements and the impact on the community itself are not covered.
- f) Gondola Proposal. SRS has included a gondola from town in their Draft Plan and it is a cornerstone of their development. How will this be funded at approximately 11 million dollars? The company has indicated it would like the gondola to be publicly funded, without indicating it has had any consultation with the parties that would need to be involved.
- g) Visual Impact. The scenic viewscape of Hudson Bay Mountain is a key component of the identity of Smithers and highlighted in the LRMP. How the proposed resort development will look from the valley needs more critical examination to ensure that visual quality is not negatively impacted.
- h) Access to Alpine Areas. Phase 3 of the Draft Plan deals with the alpine ridge above Simpson’s Gulch; however, access to this area is not addressed. The company needs to state its intentions regarding such access, bearing in mind that the LRMP specifically directs that no facilities or motor vehicles should be allowed on the Prairie outside of the existing ski boundary, and that the Hudson Bay Mountain sub-unit (10-2) will be used for Commercial Backcountry Recreation.
- i) Public Access Beyond and around the CRA. We acknowledge that changes to the Draft Plan have been made that reflects public comment received at the open house, but feel that further clarification is still needed. The Draft Plan states that access to the Prairie “shall not be unreasonably restricted”, and also that some access may be restricted “when it relates to public safety, environmental considerations or a specific event that requires an admission fee, such as an outdoor concert.” This is too ambiguous. The term “unreasonable” needs to be clearly defined to avoid arbitrary interpretation, and current provisions for public access must be maintained.
- j) Proposed Summer Grooming. The Draft Plan states that all runs will be “summer groomed”. What this means is not defined. This is especially relevant in the alpine areas SRS is proposing to operate in. Soil and vegetation disturbance in alpine areas has a very long recovery time, can cause soil erosion, and have very negative visual effects. This term needs to be explicitly defined in The Plan.
- k) Avalanche Control. More detail on avalanche control, especially noise levels resulting from control operations is needed. Some recent avalanche control activities by another party on Hudson Bay Mountain resulted in unacceptable noise levels throughout the valley.

This draft Master Plan leaves too many questions unanswered for the BVCRB to be able to determine whether the direction in the LRMP is being followed. With a proposed development of this size, the beds alone numbering more than in there are residents in town of Smithers, there is potential for many negative effects as well as positive impacts. The BVCRB therefore feels that

much more detail is needed in a Draft Master Plan before any permit is issued to the company to proceed with development. This will allow a proper assessment of this proposed development to be made.

Sincerely,

Adrian de Groot
Chair,
Bulkley Valley Community Resources Board