

Zincton Formal Proposal (FP) Summary of Engagement

"What We Heard"

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Zincton is a new resort proposal located near New Denver, British Columbia and is currently in the second stage of the resort review process (or major project review process), the Formal Proposal (FP), under the *All-Seasons Resort Policy* (ASRP). For more details visit the Mountain Resorts Branch (MRB) website: https://www2.gov.bc.ca/gov/content/industry/natural-resource-use/resort-development/proposed-approved-resort-master-plans/list-of-proposed-plans.

The FP is a conceptual resort development plan that provides project details including proposed mitigations for high level issues identified during the Expression of Interest (EOI) stage (the first stage). The FP includes further details on development concepts, recreational opportunities being offered, servicing options, response to environmental concerns, and market and financial capability. If the FP is approved, the Province can enter into the Interim Agreement (IA). The IA is a legal contract between the Province and the proponent that provides a Licence of Occupation to the proponent for the purpose of entering onto the land to conduct studies, investigations, and data collection activities, which is necessary for the preparation of the Resort Master Plan and the Master Plan Review Process (subsequent stage of the major project review process).

This document is a summary of input and feedback received by MRB, within the Ministry of Tourism, Arts, Culture and Sport (TACS; the Ministry), from members of the public and stakeholder organizations during the formal 30-day public review and comment period for the Zincton FP All-Seasons Resort proposal. Please note that First Nations, Agency, and Stakeholder referrals were also conducted within the same timeframe between October 21, 2021, to November 23, 2021, and these comments are reflected in this document. Also note that the proponent engaged with the public during the same period, but these comments are not reflected in this document.

The Zincton FP project planning and public engagement was guided by the ASRP and associated guidelines (https://www2.gov.bc.ca/gov/content/industry/natural-resource-use/resort-development). During the public review and comment period, the Zincton FP was advertised in several local newspapers (The Valley Voice, Arrow Lakes News, and Nelson Star), the provincial Gazette, and on the MRB website. It was also posted on several local community bulletin boards and the work was profiled in articles and letters to the editor in several news outlets. A total of 2,104 submissions were received during the public review period. Most feedback was received electronically through the Applications, Comments and Reasons for Decision website (ACRFD), with a smaller number of comments received via mailed in letters.

This FP "What We Heard" document identifies and summarizes comments, concerns, questions, and suggestions that were received during the FP public comment period. The input received will ensure that all values and expressed interests are considered in project planning, process review steps, and decision-making. A number of these responses and submissions were similar

to those captured in the EOI public review period which were summarized in the EOI "What We Heard" document and be can be found on the MRB website:

https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/natural-resource-use/all-seasons-resorts/zincton/what we heard zincton- final - december 2020 - pw.pdf. This FP "What We Heard" document will be a summary of responses received in both the EOI and FP engagements.

Based on responses and formal submissions, the FP "What We Heard" document summarizes the engagement into seven common themes/categories which were ranked according to priority/importance (correlates to number of comments for each theme).

Importance	Theme
1	Environmental Considerations
2	Impacts on Local Community and Economy
3	Proposed Development
4	Public Health and Safety
5	First Nations
6	Public Access and Recreation
7	Cumulative Effects

For the sake of brevity due to the number of comments received, this document contains paraphrased wording (*italics*) summarizing the comments, concerns, questions, and suggestions received.

Public review and comment by the numbers (# of comments received):

ACRFD: 2,084Mailed Letters: 20

Feedback Themes

1. Environmental Considerations

The environmental theme generated significant comments, concerns, questions, and suggestions from respondents. They were broken down in the following subcategories:

Wildlife

Many respondents expressed concern that the proposed development would be detrimental to wildlife and wildlife habitat:

- Proposed development would have negative impacts on number of species including caribou, grizzly bears, mountain goats, mule deer, wolverines, western toad, and white bark pine
- Development will impact wildlife habitat and connectivity corridors, and cause habitat fragmentation
- Increase in traffic and human activity could affect habitat connectivity/corridors
- Proposal has not addressed wildlife impacts from the village (attractants, visitors venturing outside of village footprint)

Wildlife Protection Zone

- Legal, operational, and management issues to make zone feasible
- Enforcement of the wildlife protection zone
- Questions on how Zincton will work with local groups to protect the wildlife corridor outside of the proposed tenure

Physical Environment

- Impacts of resort construction on steep slopes could affect slope stability, hydrology, erosion, water run off during snow melt/heavy precipitation events, and cause landslides and creek channel damage
- Area is full of toxic materials left from past mining practices; resort construction could release toxic substances into surrounding area
- Questions related to abandoned mine shafts and the viability of terrain for development in light of those structures
- The need to preserve the pristine landscape, or conversely, the area is not pristine and is scarred by logging/mining

Goat Range Provincial Park

Proximity of development to the Goat Range Provincial Park may lead to increased access into the backcountry part of the park:

 Greater clarity and information sought on how park values and environmental disturbance would be managed

Wildlife-Human Encounters

Respondents noted that the increase in users of the area may increase the probability of wildlife-human encounters:

- The increased presence of humans in the area will lead to more human-wildlife conflicts and will result in loss of wildlife and wildlife habitat
- The increased traffic on Highway 31A will lead to a higher wildlife mortality rate as a result of traffic incidents

Water

Concerns expressed by respondents included how the development would affect water quality and quantity:

- Questions were raised as to the effect on surrounding water due to the area's many contaminated mining sites
- The creeks, riparian areas, and small alpine lakes in and around the proposed resort are sensitive to additions of nutrients and are important as they are relatively undisturbed habitat
- Questions around how water quantity in surrounding creeks/streams and downstream communities may be affected in light of the water needs associated with ski resorts

Vegetation / Floral-Fauna Life

Respondents stated that the development area has sensitive sub-alpine and alpine plant communities:

• The area should have restricted summer use

Carbon Footprint

- Claims that the proposed resort will be carbon neutral, but no consideration of the impact of guest travel to this remote destination or the high carbon load from construction of the resort
- Electric Vehicle (EV) bus concept
 - Visitors are still more likely to drive own cars versus parking in adjacent towns and taking EV buses to resort
 - Questions related to where vehicles will park if they ride the EV bus
 - Costs associated with using EV buses

Climate

- Climate feasibility of proposal location and suggested 4-month season viability (lack of snow, low elevation, south facing terrain, climate change)
- Request assessment of viability of proposal given climate impacts

1% For the Planet / Remediation

- Questions on how the proposed clean up and remediation could pose a threat to downstream communities
- Questions on where additional funds will come from if 1% for the Planet does not cover the cost of remediation
- Remediation requires government involvement
- Questions related to how and when the site will be remediated
- Request independent contamination assessment that will determine:
 - The impact of construction activities on the landscape
 - Estimate cost of remediation and how will 1% of revenue will impact this

Environmental Recommendations

Respondents suggested requirements to address environmental issues. These included:

- Remove sensitive areas from proposal (e.g., Whitewater Canyon)
- An independent Environmental Assessment should be conducted
 - Environmental, ecological, and wildlife studies on both private and crown land components to quantify, assess impacts, and propose mitigations within proposed area
 - Detailed site species surveys at all proposed construction sites
- A Wildlife Management Plan should be developed
- Conduct a Hydrology study

2. Impacts on Local Community and Economy

Respondents commented that the area and region is going through a period of economic and social transition which will see the tourism sector play a much larger role in diversifying the region's economy.

The project could expand economic and local employment opportunities for residents/tourists by providing direct employment during construction and operation of the resort. The area will benefit from an increase in local economic growth and diversification:

- Possible employment opportunities outside of resort (direct and indirect jobs)
- Potential to bring in new businesses to New Denver and Kaslo
- Potential to boost resources/services/infrastructure in the communities
- The development will bring in more tourists and visitors to area and region
- The development will provide more activities for people to enjoy
- The development addresses employee housing and residential accommodations

Conversely, respondents felt that the broader community may not benefit and expressed concerns with only immediate stakeholders experiencing financial benefit:

- The project as proposed will have negative economic impact as visitors will spend majority of money at the resort and not in local towns/villages
- The proposed development will put additional pressure on already scarce resources and services (e.g., it will create housing crisis, and grocery and gas shortages due to influx of visitors)
- The local hospital is already operating at capacity due to severe cuts to hospitals in recent years; the area has had issues retaining and maintaining medical and emergency services
- The tourism sector only creates low paying jobs and contributes to the loss of affordable and available housing (both for sale and rental)
- Locals will not be hired as there is lack of skilled workers in surrounding communities and most ski resorts are served by foreign workers
- Increased population will increase pressure on existing infrastructure (highways, ferries)

Respondents also commented on the impacts this kind of development would have on the existing community and culture of the nearby villages/towns:

- Negatively impact quality of life
- Large scale cultural change
 - People move to this area to avoid large scale developments and tourist driven economy
- The resort will destroy what makes this area special
 - o Quaint, small-town feel, peaceful and more affordable

Market Analysis

Respondents expressed views that options for this type of recreation already exist in the area and questioned the economic feasibility of the project:

- Existing major All-Season Resorts within 200km distance Red Mountain, Whitewater Resort, Revelstoke Mountain
- Community ski hills Summit Lake Ski Hill
- Adjacent Adventure Tourism Operators (Retallack and Selkirk Snowcat Skiing, Stellar Heliskiing)
- Resort could create competition with existing operators for recreational opportunities
- The population is insufficient to support an additional resort
- Smaller demographic of skiers for backcountry skiing (intermediate to advanced skiers)
- Visitors may not shift skiing from other resorts due to winter travel, travel distance, secondary highways (low capacity) and lack of groomed runs

Other Comments / Requests

- Proposal is counter to regional land use plans, economic studies, and initiatives
- Comprehensive land use planning required
- Updated Official Community Plan required
- Request moratorium for corridor until land use planning is completed
- More studies required to identify socio-economic impacts on neighboring communities
- Request a capacity study

3. Proposed Development

Comments in this theme were in relation to the concept, area, and size of the development. In many instances, respondents expressed their views simply as either for or against the proposal without providing a specific reason for their view.

Respondents regarded the project as a balanced proposal that takes into consideration sustainability of the area and environment while providing the opportunity to enhance or improve social and economic conditions locally and in the region:

- Proposed low density, controlled activities are sensitive to environmental impacts (takes into consideration the area capacity to sustain level of activities) while providing safe and unique visitor experience
- Unique concept of lift access to backcountry with a limited number of groomed ski runs compared with other well-known destination ski resorts
- Environmentally sensitive proposal as an example of responsible environmental stewardship

The proposal could bring benefits to local economy and services

Respondents also expressed several concerns in this theme, including:

- The proposed project development area is too large
- An increase in recreational use of the area will result in environmental degradation
- The project area overlaps with other recreation tenures issued under Adventure Tourism or Commercial Recreation
- Questions on the need for the project and market saturation (no more resorts are needed in the area)
- The area should be left for locals and free of motorized public access to backcountry
- The proposals do not provide enough details, and lacks information on proposed lodge, parking lots, restaurants, cabins, and amenities
- The project is geared towards the wealthy and the not average person
- Questions on wastewater treatment and generation/removal of sewage and garbage
- Questions on where the power supply will come from and what would happen if there were a power outage
- Questions on why the Whitewater trail is included in tenure area
 - Trail created and maintained by local user groups
 - This will increase public use and overwhelm the trail
 - The impact of increased visitation on wildlife
- Questions around how skiers will exit ski terrain without going through private land (eastern and southern border of proposed area)
- Capacity of backcountry terrain greatly overestimated (too many skiers per day)
 - Impact on quality of skiing
 - Quantity of proposed skiers per day does not reflect an authentic backcountry experience
 - The preservation of area with the current estimated daily population
- The backcountry is away from lifts and will entail long egress routes/climb back up
- Questions on how the proposed all-seasons resort will be utilized in the summer
- Questions around what happens to the tenure if proponents decide to sell or the resort goes bankrupt, and what happens to the commitments and recommendations outlined in their tenure
- The need for and placement of backcountry lodge
 - Access for visitors/supplies
 - The impacts it may have on wildlife and wildlife habitat
 - Logistics of it being in the summer closure area
 - Requires significant site preparation prior to construction
- The number and location of emergency huts
 - Location is too remote, will lead to overnight use
 - o Inadequate number for large area
- The private land development is not considered with this proposal

- Private land development success is dependent on the public land tenure
- Same impacts on private component
- Property development marketed as a ski hill, grant exclusive use of public lands for profit of adjacent private land development

4. Public Health and Safety

Respondents who expressed support for the project felt the proposal would:

- Provide residents and visitors with safe access to backcountry environment
- Promote a healthy lifestyle while respecting the environment
- Make a positive contribution to maintaining or enhancing a desired level of health services in the area

There were also a variety of comments, questions, and concerns captured in the following areas:

Health

- If the development goes ahead the local Emergency Room and Hospital needs to be resourced and may require additional funding to accommodate increased population without overwhelming current medical system
- The resort staff should be trained in First Aid/CPR, and Health & Safety protocols and policies should be in place at the resort

Search and Rescue / Emergency Response (Fire / Rescue)

- Questions on how the resort will provide support to local search and rescue teams
- Questions on local emergency capacity to cope with the potential increased population
- Possibility of inexperienced visitors getting lost or caught in avalanches
 - Possible requirement for guides or training before entering the backcountry
- The type of safety protocols that will be put in place to evacuate visitors if there is fire/flood/avalanche/landslide
- Questions on who will cover the costs for search and rescue and emergency response

Avalanche Safety Concerns

- Highway 31A is at high risk for avalanches
- Avalanches can go all the way to valley bottom and onto highway
- London Ridge and surrounding mountains are at high risk for avalanches

- Questions related to support and control of backcountry users that may not have appropriate basic snow/avalanche safety knowledge as well as multi-user groups using the terrain at same time (safety, liability)
- Questions on what type of avalanche control/mitigation will be implemented and who will pay for this expense

Mining Safety

There are many abandoned mine shafts in the area that pose a safety risk

Overlapping Tenures and Recreational Users

• There is potential for conflicts between users of this area which could create potential safety issues

Wildfire

• Increased population in the area could lead to higher risk of human caused wildfires

Highways

- Safety of local area highways due to increased traffic and winter use
- Increase in accidents due to vehicles or wildlife
- Capacity and infrastructure for surrounding highways and ferries
 - Cost of maintenance and upgrades and who will cover these costs
 - o Existing infrastructure ability to handle increase in population volume
- Request an assessment of increased traffic volume

5. First Nations

Respondents expressed concerns and questions regarding the Province's obligation to consult with First Nations:

- Lack of consultation with First Nations
- Questions related to the Autonomous Sinixt and if they will be acknowledged and consulted with for this proposal
- Questions related to the Province's commitment to implementing the Truth and Reconciliation Committee Calls to Action, the Declaration on the Rights of Indigenous Peoples Act (Declaration Act) and United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) with regards to this proposal

6. Public Access and Recreation

MRB notes that the area surrounding Highway 31A between New Denver and Kaslo has been experiencing steady growth in outdoor recreation in terms of public and commercial motorized and non-motorized recreational activities.

Respondents noted that lift access will make the proposed (and popular) area more accessible, potentially enabling a larger segment of the population to participate in backcountry recreation:

- Foot-power or ski-up elevational gain to access backcountry in this area is perceived as an impediment for many, making a day trip unattainable and not realistic
- Zincton FP proposes to enshrine public access and enhance recreational opportunities

Respondents expressed concern with the possibility of "losing" access to land that is currently regarded as an area with easy and free public access to backcountry recreation (skiing, mountain biking, hiking, snowmobiling); specifically, for London and Whitewater Ridge:

- The backcountry should be for everyone to enjoy
- The Province should not "Privatize" one of the most easily accessible ski touring areas
- There was concern about potential cost/admission to areas previously accessible free of charge and loss of public parking along the Highway 31A; many residents have concerns about affordability of access fees given current economic conditions
- The proposal should include provisions for free public access and parking
- Certain areas should be protected for public use only
- The area has seen already a loss of public areas to commercial tenures
 - Some areas should be left untenured
- The potential loss of established hiking trails (designated recreation trails)
- There may be conflict between commercial and recreational users

7. Cumulative Effects

We also heard, due to heightened tourism sector interests expressed through multiple applications for land use in the Highway 31A corridor, that cumulative effects and land use planning should be a part of the planning and permitting process and considered in decision making:

 There are significant concerns over the scale and pace of proposed developments, considering this area is already under high pressure from existing commercial recreation tenures (heli-skiing and cat-skiing) and subject to intensive public use. The cumulative

- impacts of a high-density use combined with resource extraction activities could have detrimental impacts on wildlife and wildlife habitats.
- The impacts to First Nations interests and incorporating traditional use knowledge into the planning process
- Request for a cumulative effects assessment of past and proposed activities on environmental, cultural, health, social, and economic values

Next Steps:

- MRB will determine the feasibility of the Zincton FP based on all comments received and through the identification of any land-use conflicts.
- If the FP is found to be feasible and an Interim Agreement issued, the proponent will be invited to submit a Master Plan. MRB would initiate a more intensive and detailed review and planning process consistent with the *All-Seasons Resort Policy* (ASRP) and the *All-Seasons Resort Guidelines* (ASRG).
- MRB will continue to engage with First Nations, communities, and stakeholders to understand their interests and how they may be impacted by this proposal.
- For more details on the planning process and information requirements for All-Seasons
 Resort development in British Columbia, please visit: / gov/content/industry/natural-resource-use/resort-development/applying-to-develop-a-resort
- For a visual presentation of the entire process from an FP to the final project approval, please refer to the <u>All-Seasons Resort Application Process Flowchart</u>.