

Appendix E

**Analysis of Public Submissions Received During Jumbo Glacier Draft
Project Report Specifications Public Comment Period: December 18, 1996
to February 20, 1997.**

FINAL REPORT

**ANALYSIS OF PUBLIC SUBMISSIONS RECEIVED
DURING JUMBO GLACIER DRAFT PROJECT REPORT
SPECIFICATIONS PUBLIC COMMENT PERIOD
DECEMBER 18, 1996 - FEBRUARY 20, 1997**

July 15, 1997

Methodology

This document presents an analysis of written public submissions received by the EA Office during the public comment period on the Jumbo Glacier Project draft project report specifications, and was compiled by staff at the EA Office. The public review period commenced officially on January 13, 1997 and concluded officially on February 12, 1997. However, the draft specifications were made available to the public from December 18, 1996 onwards, and submissions were accepted up until 10:00 am on February 20, 1997.

The analysis was conducted in three stages, and entailed the construction of a detailed chart (see the July 4, 1997 chart, circulated to the Project Committee under cover of the EA Office's July 7, 1997 memo). The first stage involved labeling each submission by type (i.e. e-mail, form letter, individual letter, petition), name of writer, place of origin, date written or received, those indicating support for, or opposition to, the project, and whether or not a concern regarding the EA process and/or the draft project report specifications had been noted. Each submission was counted in the total received, with each petition documented as a separate submission. The second stage of the analysis involved a more thorough review of each submission to determine its main points, and these are summarized in the July 4, 1997 chart. The third and last portion of the analysis involved the determination, in cases where a concern has been noted, of whether or not that concern was recognized and considered in any degree in the draft project report specifications, and, if not, which Project Committee member or other review agency would be the appropriate lead reviewer to address the concern. Where submissions specifically allude to the content of the draft specifications, these too are referred to the lead reviewer.

Total Number of Submissions

As noted above, the deadline for public comment on the draft project report specifications was originally set as February 12, 1997. However, a heavy volume of submissions continued to be received at the EA Office during the following week, and it was decided that these late submissions would be included in the analysis. Submissions received after 10:00 am on Thursday, February 20, 1997 were not included in the analysis. All submissions, however, were forwarded to the Project Registry, the satellite repositories and the proponent.

Almost 400 submissions were received and recorded in the Project Registry. Some people wrote more than once. Their letters are counted as separate submissions in cases where they are differently worded, but not in cases where the identical submission is sent to more than one government official or politician. The Project Registry noted about 30 submissions which were replicates of submissions sent by the same person to other parties. Less than 20 people forwarded more than one separately worded submission, one of whom wrote three times. Approximately 15 submissions were illegible. A number of the submissions represented form letters, and are counted separately when forwarded from different individuals. In total, exactly 350 submissions were deemed to be legible and not to be duplicates of other correspondence sent by the same person.

Petitions

While the vast majority of submissions were letters, e-mails, etc. received from individuals or families, five of the submissions were petitions. Four of the petitions indicated opposition to the project, and contained 1,490 signatures. One report, signed by 78 students from Selkirk College (which, due to the numbers of signatures, is being reported as a petition), while taking no formal position in favor of the project, was generally positive with respect to the prospects for development.

The content of each of the five petitions was as follows:

- *"...We, the undersigned, do not want the provincial government to grant a permit to Jumbo Glacier Alpine Resort or any other ski resort to use the Jumbo Pass area as a ski resort..."*
Signed by 294 people
- *"...We, the undersigned, are completely opposed to the Jumbo Glacier Resort proposed for the sensitive alpine of the Purcell Mt. Range in southern interior BC, Canada. We will not use, or support in any way, the proposed mega city which will destroy the wild habitat - home to grizzlies, mountain goats, wolverines, woodland caribou, Golden Eagles, Peregrine Falcons, Bull Trout and the declining Harlequin Ducks to name just a few. The entire area is extensively used by low impact, non-intrusive recreationalists and we insist the government say NO to the proposed resort..."*
Signed by 484 people
- *"... We, the undersigned, do not want the Provincial Government to grant a permit to Jumbo Glacier Alpine Resort or any other ski resort to use the Jumbo Pass area as a ski resort. 2. We, the undersigned, are opposed to the Jumbo Glacier Alpine Resort Development..."*
Signed by 572 people
- *"...We, the undersigned, oppose resort building and heli recreation in the Jumbo Creek Valley and the entire Jumbo/Glacier area including...Monica Meadows, the Horseshoe Glacier, the McBeth Ice fields and the Tenise Creek drainage..."*
Signed by 140 people
- The report submitted by Selkirk College students focused on three main points - fair consideration, comprehensive analysis, and legitimate analysis of the project. The report noted that:
 - ⇒ the project should be given fair, objective and careful consideration, and should be judged on the basis of its physical feasibility as a ski area and its financial feasibility;
 - ⇒ the developers should show what the project will create, how it will create this, and how BC will be affected;
 - ⇒ the draft specifications are comprehensive, and will address this;
 - ⇒ there is concern that the specifications have the potential to go beyond reasonable limits;

- ⇒ there is concern that tourism development will be discouraged if the EA process goes well beyond judging a project on its own internal merits;
- ⇒ the approval process for a project should not be a forum to address environmental and philosophical concerns that occur across our society;
- ⇒ some opponents may well oppose the project, no matter how strenuous are the reporting requirements, and no matter how beneficial the project might be; and
- ⇒ the process should not serve a narrowly focused coalition of anti-development groups.

Signed by 78 people

Place of Origin of Submissions

Based on the 350 submissions which were analyzed, the following is a listing of the places of origin and the number of individual submissions received from each place of origin (excluding the places of origin of each signature on petitions). The total count for individual letters is 345. These latter submissions were received from the following locations:

<u>Place of Origin</u>	<u>No. of Submissions</u>
<u>East Kootenay Area</u>	
• Invermere/Panorama/Windermere	50
• Cranbrook	7
• Fairmont Hot Springs	6
• Radium Hot Springs/ Edgewater	7
• Other ¹	3
TOTAL	73

¹ East Kootenay communities from which less than four submissions were received include: Golden and Marysville.

<u>West Kootenay Area</u>	
• Nelson	80
• Argenta/Kaslo	40
• Winlaw	12
• Creston	12
• Crescent Valley	7
• Rossland	6
• Slocan	6
• Trail	4
• Other ²	23
TOTAL	190

² West Kootenay communities from which less than four submissions were received include: Burton, Castlegar, Cooper Creek, Crawford Bay, Mirror Lake, New Denver, Procter, Revelstoke, Harrogate, Johnson's Landing, Meadow Creek, Salmo and Silvertown.

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Other

• Vancouver/Lower Mainland	4
• Victoria area	7
• Other BC ³	10
• Ontario/Alberta/Yukon, with majority from Alberta	20
• United States	14
• Unknown place of origin (e-mails, no return address, letter illegible)	27
TOTAL	82

- ³ Other BC communities from which less than four submissions were received include: Kelowna, Prince George, Mayne Island and Haines Junction.

Concern Expressed - No Position on Project

Of the 350 submissions analyzed to date, 28 submissions, while indicating views on, or concerns with respect to, either the project or the draft specifications or the EA process, did not specifically state support of, or opposition to, the project. These submissions are categorized as position “not stated” in the July 4, 1997 chart.

Support for Project - Main Points

Of the 350 submissions analyzed to date, 9 expressed support for the project (one petition was received which is considered positive towards the prospects for project development - from Selkirk College).

Key points include (not in any order):

1. area is not pristine, as many people believe;
2. area has great potential as a ski area;
3. ski resort is preferable to mining, forestry or other forms of resource extraction;
4. would diminish the threat of bear hunting and poaching;
5. is a legitimate economic development, creating jobs; and
6. BC investment potential would be diminished if resort not approved.

Opposed to Project - Main Issues

Of the 350 submissions analyzed, 313 expressed different degrees of opposition to the project (including four of the five petitions, with each petition counted as one submission); and

Key issues include (not in any order):

1. detrimental effects on the southern Purcell Mountains and degradation of the Purcell Wilderness Conservancy, the Bugaboos, Monica Meadows and/or Lake of the Hanging Glaciers;

2. wildlife displacement and/or loss of/fragmentation of habitat for grizzly bear, moose, elk, and black bear;
3. increased human/bear conflicts;
4. disruption of migratory routes of wildlife, causing inability to replenish gene pool;
5. degradation and increased ablation of glaciers from summer ski activities;
6. cost to taxpayer of road construction, maintenance and avalanche control ;
7. competes with already struggling ski hills such as Panorama;
8. financial gain of foreign investors to the detriment of local residents;
9. change of Kootenay lifestyle;
10. increased sewage and waste disposal problems; and
11. decreased availability of wilderness areas for future generations.

Concerns Regarding EA Process

Of the 350 submissions analyzed, 42 expressed concerns with respect to the EA process.

Key issues include (not in any order):

1. some Public Advisory Committee members are in conflict of interest;
2. too many West Kootenay representatives on the Public Advisory Committee;
3. too much representation from special interest groups;
4. process is adversarial and not conducive to productive dialogue;
5. invites radical views;
6. time period for public comment too short (2 submissions stated this concern);
7. process is inefficient, too long and costly;
8. process is flawed if it cannot be summarily terminated when a project is unacceptable;
9. process definition does not refer to a fair and unbiased adjudication of impacts, costs and benefits;
10. process should not abbreviate reporting of public comments;
11. assessments should not be proponent-controlled; and
12. there should be a formal public hearing.

Specific Comments on Draft Project Report Specifications

Of the 350 submissions analyzed, 66 made explicit observations with respect to the draft project report specifications.

The concerns regarding the specifications are very specific, and need to be addressed individually. Generally, however, concerns regarding the specifications included (in no particular order):

1. no reference to total resource planning;
2. alternative locations for resort not explored;
3. statements about decision to accept project for consideration under CASP in *Preface* of draft specs were not substantiated by background documentation;
4. no mention of possible impacts on Glacier Creek Valley;
5. provincial sustainability goals not clearly articulated;

6. no mention of the function of public letters in the process;
7. no discussion of responsible stewardship of land and resources;
8. should document impacts on wilderness businesses;
9. study area should be enlarged - is too restrictive, given resort's impact potential;
10. cumulative effects of salt, fertilizers, glacial ablation and waste management should be discussed;
11. costs to taxpayer for road construction, maintenance and avalanche control not addressed;
12. impact on the Panorama ski resort not addressed
13. potential impacts on wildlife habitat for many species, such as black bear, wolverine, mountain sheep and caribou, need to be addressed;
14. the grizzly bear study requirements are inadequate (e.g. there should be a three-year field study);
15. more detailed habitat suitability or capability studies are required;
16. the socio-economic assessment framework for the EA review is inadequate; and
17. socio-economic studies should be based on full cost accounting methods and/or should adopt an approach based on ecological economics.

Opposed to Project	Support for Project	Position not Stated	Concern(s) Regarding EA Process	Comment(s) Regarding Specifications
313	9	28	42	66