

Appendix F

Project Committee/Review Agency Responses to Public comments on the Draft Specifications, as flagged in July 4, 1997 Chart: Tabulation of Public Comments received during Public Comment Period on Draft Project Report Specifications – December 18, 1996 to February 20, 1997.

Jumbo Glacier Alpine Resort Project - Project Committee/Review Agency Responses to Comments Received on the December 13, 1996 Draft Project Report Specifications

Submission # From Chart	Issue(s) for Follow-up (per July 4, 1997 Chart)	Project Committee/Review Agency Response(s)
#21	<i>Public advisory committee (PAC) concerns</i> - (1) number of seats given to West Kootenay reps; (2) PAC make-up.	Three seats out of 11 were assigned to West Kootenay interests. Two seats represented environmental interests, the third represented the tourism program at Selkirk College. West Kootenay representation is not unreasonable, given the high level of interest of West Kootenay residents. This is demonstrated by the volume of public comments received from that area during the EA review of the project. (EAO)
#24	<i>West Kootenay involvement</i> - West Kootenays were not a part of East Kootenay CORE process. Why involved in project review?	Based on public submissions received, the implications of potential resort development for the future of the backcountry recreation experience in areas surrounding the project site are of interest to both East and West Kootenay residents who currently use the area. Moreover, while CORE divided the planning tables into the East and West Kootenays, this was not intended to arbitrarily separate those issues which are common to both regions along the boundary between them, or to be implied to have done so. The CORE documents identified issues which traverse this boundary, such as the public concern about the proposition of an access road through Jumbo Pass to connect the East and West Kootenay regions. Government's 1995 East and West Kootenay Land Use Plans maintained, at least nominally, a division between the two regions, in order to respond individually to the two CORE reports, and to the two land use planning tables. However, the details of government's approved policies for the area are found within the <i>Kootenay/Boundary Land Use Plan Implementation Strategy (KBLUP-IS)</i> , a document which is 'seamless' with regard to the treatment of issues in the East and West Kootenay regions. The general management directions and guidelines in the <i>KBLUP-IS</i> are applicable in both areas. (LUCO/EAO)
#40	<i>Time for review</i> - Inadequate time for public to review draft specifications.	The <i>Time Limits Regulation</i> , enacted under the <i>Environmental Assessment (EA) Act</i> , provides for from 15 to 30 days for public review of draft specifications, plus a period of not less than 7 days prior to the commencement of the comment period, to allow time for advanced public notification and distribution of copies. In this case, given the size of the document and the intervention of the Christmas season, EAO allowed 3 weeks from the date of release of the specifications (December 18, 1996) until formal commencement of public review (January 13, 1997). In addition, since a heavy volume of public comments on the draft specifications continued to be received in the week following the comment deadline (February 12, 1997), comments were accepted for consideration for another 8 days (until 10:00 a.m. on February 20, 1997). Arrangements for public comment on the draft specifications are deemed to have been adequate, given the time of year and size of the document. Few of the large number of written submissions received during the comment period expressed the view that the comment period was too short. (EAO)
#43	<i>Total resource planning (TRP)</i> - Why is MoF TRP approach not being used to review project?	In MoF's Invermere Forest District, TRPs are used for timber harvesting proposals only. The EA process sponsors a considerably more detailed, comprehensive review. (MoF)
#46	<i>Decision making context</i> - EA process presupposes approval of project.	Incorrect. The EA process is expected to conduct an assessment of the effects of a project so that the project committee can provide ministers with the information necessary for an informed decision on whether or not the project should proceed. The process is not predicated on any presupposition that a project will be certified at the conclusion of the EA review. This particular comment was made in reaction to the wording of one sentence in the draft specifications (the 3 rd sentence on page xix of the <i>Preface</i>). This wording was also identified as a source of concern to some members of the PAC during its meetings. EAO agrees that the

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<i>(Cont'd from previous page)</i>		wording, taken out of context, and read in isolation of the rest of the <i>Preface</i> , could be misleading, and the sentence has been clarified for the finalised specifications. (EAO)
#46	<i>Treatment of public submissions</i> - Concerns raised in public submissions are abbreviated/consolidated, and dismissed or confused. EAO omits issues for which public has expressed interest/concern.	Disagree. In <i>Appendix A</i> to the draft specifications, project committee members and other government review staff went to significant lengths to identify, catalogue, group and respond to the large volume of views and issues raised in public submissions on the proponent's application. It is reasonable that they should be grouped and consolidated in order to make the large volume of feedback intelligible for purposes of analysis. Moreover, the project committee has only opted not to pursue concerns in situations where either the issue is beyond the jurisdiction of the EA process or there is no public policy basis for pursuing the issue. (EAO)
#46	<i>Proponent-led studies</i> - Assessment should not depend on proponent-funded studies.	Under the <i>EA Act</i> , proponents are primarily responsible for carrying out the assessments necessary to satisfy the reporting requirements of the EA process. This approach is employed in every jurisdiction in Canada, and in most jurisdictions in the USA and elsewhere in the world. The role of government is to ensure that appropriate technical expertise is brought to bear on the review of a proponent's project proposals. Government needs to provide adequate direction to each proponent on required studies and assessments, and the proponent's information should receive meaningful and competent review by professionally neutral and objective technical experts. Usually the latter are employed by government agencies, although arm's length consultants may also be used to advise government on specific issues. (EAO)
#46	<i>Alternative resort locations</i> - are not explored in the draft specifications.	Since the proponent only has a development option in the upper Jumbo Creek valley, it would not be meaningful to examine other sites, and indeed, this would go beyond the jurisdiction of the <i>EA Act</i> . The Act sets up a project-specific review mechanism to judge a specific development proposal on its merits. The <i>EA Act</i> requires that a proponent make an application, and the proponent can only apply for development approvals at sites for which it has the right to make such applications. Thus, while there may or may not be better sites for a particular type of development, the proponent can only make application where it has obtained the right to do so. Pheidias has concluded an 'Interim Agreement' with the province under the CASP process, and that agreement authorises it to seek approval for a ski resort development in the upper Jumbo Creek valley. It currently has no authority to seek such approval elsewhere. (EAO)
#46	<i>Land use plan management objectives</i> - Government has not finalised management guidelines for SRMZ.	This comment was true when written, but is no longer correct. The province released finalised planning guidelines – the <i>Kootenay/Boundary Land Use Plan - Implementation Strategy</i> – in June 1997. (EAO)
#46	<i>Economic assessments</i> - How will a fair, unbiased economic assessment of real costs and benefits be achieved?	The finalised specifications reflect an impact assessment approach to project review, which is normal under the EA process. In assembling the specifications, the project committee has tried to identify for assessment all significant costs and benefits in the broader sense, including both monetary and non-monetary factors which are within the scope of the EA process. Many of these factors were identified by the public (rather than by government agencies) during the review of both the proponent's application and the project committee's draft specifications. During the course of preparing advice and recommendations for ministers, the project committee will evaluate and summarise the project's costs and benefits, following review of the proponent's project report. The project committee may commission an expert consultant to assist with the development of its analysis of positive and negative effects. (MEI)

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#46	<i>Intervenor funding</i> – should be granted to citizens, so that they can present views, commission technical expertise to critique project.	This issue, and the policy environment for the provision of participant assistance to the public during the course of this review, is addressed in item 1f) of <i>Appendix A</i> in the December 13, 1996 draft specifications (see pages A-6 to A-7). (EAO)
#53	<i>Draft Specs, Preface - Section 3</i> – no reference in <i>Preface</i> to specific body of EA to be used, no rationale for using a project committee, and no explanation of the relationship of the project committee to the public advisory committee (PAC) and the general public.	The comment on “...the specific body of Environmental Assessment or other process to be used...” is not clear in its intent. However, the policy context within which effects are assessed under the EA process is summarised in section 8.2 of the <i>Preface</i> to the draft specifications. The <i>EA Act</i> requires that a project committee be set up to steer each review, and its general role and purpose are explained in section 5.1 of that <i>Preface</i> . Some information on the role of the PAC is contained in section 7.5 of the draft specifications, and this discussion is expanded upon in section 5.5 of <i>Appendix B</i> to the finalised specifications. In the finalised specifications, <i>Appendix B</i> in <i>Volume 2</i> replaces the <i>Preface</i> to the draft specifications for the purposes of explaining the background to the various issues being raised in submission #53. (EAO)
#53	<i>Draft Specs, Preface - Section 4</i> - crucial stages in the initiation of a ski proposal are outlined without complete disclosure of all documents, omission of the government's policy respecting stewardship of the land, no mention of the Glacier Creek valley which may be impacted.	It is not clear which documents are being referred to in this comment. Prior to review under the <i>EA Act</i> , the initial stages of review of the project were managed under BC's Commercial Alpine Ski Policy (CASP). Requests to access specific CASP-related documents should be referred to MELP's Cranbrook office (BC Environment and Lands). With respect to the policy context for examining specific issues raised by the project, including land stewardship issues, where considered necessary for purposes of clarification, this policy context is addressed on an issue-by-issue basis in <i>Appendix A</i> to the finalised specifications. The project committee has considered the Glacier Creek valley in its assessment of wildlife issues and, based on MELP's advice, has incorporated upper Glacier Creek and upper Horsethief Creek, above its confluence with Farnham Creek, in an expanded wildlife study area. (MELP/EAO)
#53	<i>Draft Specs, Preface - Section 5.1</i> - provincial sustainability goals are omitted, there is no description of the nature and extent of minimisation of the full range of effects which are subject to the process, and no attempt to provide environmental enhancement alongside the benefits - poor wording of this whole key statement. <i>Page xxi</i> - lack of clarity as to what the aboriginal people see as their main goals, and lack of participation by the Sinixt people. <i>Pages xxii and xxiii</i> - no mention of the function of letters from the public in the EA process, no accounting by the EAO as to the number, scope and viewpoint of the letters, no mention of the EAO's dealing with the	The project committee's view of sustainability issues was documented in its response to item 3a) in <i>Appendix A</i> to the draft specifications (see pages A-20 to A-22). Re. the comments on minimisation of effects and environmental enhancement, under the EA process, it is the proponent's role to respond to the issues identified in the finalised specifications, documenting to what extent it can avoid or mitigate adverse effects or enhance project benefits, and not the project committee's role to prejudge these issues in the specifications. Section 5.1 of the <i>Preface</i> to the draft specifications (section 3.1 of <i>Appendix A</i> to the finalised specifications) is intended simply to present a very brief overview of the EA process. The goals of First Nations which are participating in the EA process for this project are documented in section G.1 of the specifications, which also mentions the interest of the Sinixt people in the review. While section 5.1 of the <i>Preface</i> to the draft specifications did not make mention of the process by which the project committee has evaluated public submissions on the proponent's application, section 7.4 did so. In addition, <i>Appendix A</i> of the draft specifications represented the project committee's formal record of its review and analysis of public submissions on the application prior to preparing the draft specifications. Section 5.4 of <i>Appendix B</i> to the finalised specifications provides an up-to-date summary of the approach to processing public submissions received on the draft specifications. Last year, EAO also produced a summary charting of the submissions received (dated July 4, 1997), plus a brief summary report on those submissions (dated July 15, 1997). (EAO)

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#53	<i>Draft Specs, Preface – Section 5.3</i> – Lack of federal/provincial review co-ordination, lack of attention to triggers other than <i>Fisheries Act</i> triggers, ignoring cumulative effects assessment.	Section 5.3 of the <i>Preface</i> to the draft specifications (now section 3.3 of <i>Appendix B</i> to the finalised specifications) has been updated to reflect conclusion of a formal federal/provincial EA co-operation agreement in April of 1997. This agreement will only have effect in the present review if <i>CEAA</i> is legally triggered. If <i>CEAA</i> is triggered, the co-operation agreement provides for close federal/provincial co-operation in conducting the EA review of the project. Focusing on a <i>Fisheries Act</i> trigger reflects the reality that the potential for the project to need an authorisation under the <i>Fisheries Act</i> is the only known potential <i>CEAA</i> trigger. Without a <i>CEAA</i> trigger, the federal government has no legal authority to require a cumulative effects assessment. The jurisdictional context for federal consideration of the project under <i>CEAA</i> is discussed further in <i>Appendix A</i> , section H of the finalised specifications. (DFO)
#53	<i>Draft Specs, Preface - page xxvii, Section 5.4</i> - disputes assumptions that decisions need to be made in the absence of land use plans being in place, that available information is sufficient in quality and quantity to make tenable decisions, and that there exists an effective and responsible stewardship; disputes the omission of any mention of the parties responsible for this stewardship, the assumption that the land use regime being exercised is adequate, and lack of external controls and evaluation of decisions, information and stewardship.	The land use plan for the Kootenay region has now been finalised – see the <i>Kootenay/Boundary Land Use Plan Implementation Strategy (KBLUP-IS)</i> of June 1997 – which now functions as the regional planning context for the review of the project. The project committee has not assumed that available information is sufficient in either quantity or quality to make reliable decisions, which is why the committee requires the proponent to submit a project report with additional information. Issues of resource data, stewardship and decision making are ultimately the responsibility of the individual line agencies with legislated and/or policy-based management responsibility for each resource. EA reviews are conducted within the context of the prevailing policy environment, including current resource management regimes. If there are concerns about their adequacy, such concerns should be pursued directly with the relevant line agencies. (EAO/LUCO)
#53	<i>Time for review</i> - Complicated draft specifications need careful examination by public; more time needed.	See response to similar issue under submission #40 (<i>Time for review</i>), above. (EAO)
#59	<i>Public submissions</i> - Do public letters of concern count?	See response to submission #53 comments on section 5.1 of the <i>Preface</i> to the draft specifications. (EAO)
#63	<i>Use of salt</i> – salt issue is a red herring.	Proponent has stated that no salt will be applied to ski runs for general public use, although it may be used on a few race days each year if the race organisers consider it necessary. Thus, the project committee has removed all reference to assessment of salt impacts from the specifications. (MELP)
#63	<i>West Kootenay representation</i> – not appropriate for public advisory committee (PAC), focus should be needs of Columbia valley.	Representation on the PAC is weighted towards East Kootenay interests (with 8 seats, versus 3 seats for West Kootenay interests). Having no West Kootenay representation would not be appropriate, given that many public submissions on the project have come from that area. One issue frequently raised in public comments concerns the implications of potential resort development for the future of backcountry recreation in areas surrounding the project site. This issue is of interest to the East and West Kootenay residents who currently use the area. (EAO)
#63	<i>Use of experts</i> – public interest groups should not be allowed to call their own experts.	Disagree. This is assumed to be a reference to the regular practice of the PAC in requesting EAO to arrange for it to discuss specific issues with identified experts in those issues (both from within and outside government). The requests were not deemed unreasonable, and helped to inform the PAC's deliberations on

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#64	<i>Grizzly bears</i> - Serious concerns re. survival of grizzly bears. Impact zone of project is not restricted to one side of Purcells, but includes area west of the Jumbo Pass. Feels that a 2-to-3-year grizzly bear study is warranted.	The project committee notes that concern regarding over-reliance on habitat capability as a means of determining the potential effect of the project on grizzly bears was raised by many reviewers. MELP has recommended changes to the draft specifications with respect to grizzly bear studies, after retaining the services of Ben van Drimmelen to review the various comments received on the draft grizzly bear specifications. The consultant's report and recommendations were reviewed with other members of the project committee who have an interest in grizzly bear issues. Their input resulted in several revisions to the draft specifications. These changes were forwarded to the project committee as part of MELP's overall submission on the draft specifications in November 1997. The finalised specifications incorporate a requirement for one season of fieldwork (June-July), collecting hair samples from grizzly bears for genetic testing purposes, prior to an EA certification decision, plus several follow-up seasons of similar data collection <i>if</i> the project is approved under the <i>EA Act</i> – see <i>Volume 1</i> and <i>Appendix A</i> , section D.3(C) for details. Grizzly bear hair sampling is intended to provide information on bear numbers and distribution, and to monitor how these may change as a result of the project. Specification D.3(C)#6 also requires that the proponent make use of research literature review results and the existing 1:20,000-scale habitat capability information to undertake a detailed analysis of the indirect off-site effects of the project within the watersheds of Jumbo, Toby, Horsethief, Glacier, Hamill, Carney, Howser and Dutch Creeks. (MELP)
#64	<i>Fish</i> – Cold streams are spawning grounds for Bull trout, an endangered species and traditional food. Federal review of fishery issues is needed, also independent inventory of Bull trout.	MELP and DFO are considering these issues jointly, per various federal/provincial agreements on shared fish management. Explanation of the jurisdictional context is presented in the background to this issue – see section H.1 of <i>Appendix A</i> to the finalised specifications. The primary need with respect to fisheries is to evaluate the project's potential impacts on Cutthroat trout and Bull trout. Bull trout are blue-listed, and are a species of special management concern for the region. Tributary streams are crucial for the maintenance of stream ecosystems and fish populations. Bull trout have not been observed in Jumbo Creek to date. However, Bull trout have been documented in Toby Creek and several of its tributaries. There does not appear to be an obstruction to fish passage between Jumbo Creek and Toby Creek. Based on other Bull trout populations in the Kootenay region, portions of Jumbo Creek may be utilised by Bull trout during some stage of their life cycle. MELP feels that the specifications adequately provide for these issues to be considered (see section D.3(A) of <i>Volume 1</i> and <i>Appendix A</i> to the finalised specifications). With respect to independent fish inventories, the <i>EA Act</i> stipulates that it is the responsibility of the project proponent to conduct and submit the assessments and other information required under the Act. It is the project committee's task to determine the validity and accuracy of the studies and analysis presented in the assessment. Using this information, as well as information gathered from other sources, the project committee will ultimately have to make recommendations to ministers on whether or not to certify the project, as proposed. (MELP/DFO)

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#65	<i>Market analysis</i> - Should look at long-term impacts of the project on backcountry wilderness-associated businesses such as hunting, biking, and hiking.	Existing and known proposed backcountry businesses are being considered under various sections of the finalised specifications. It is not within the scope of this review for the proponent to speculate on hypothetical future backcountry wilderness recreational use. (MELP)
#65	<i>R.K. Heli-Ski</i> - R.K.'s application for use of other Crown land suggests that R.K. believes that the Jumbo resort will be approved, and is investing in the Tenise and Glacier Creek areas in anticipation of proceeds from the proponent's acquisition of existing heli-ski terrain.	The implications of the project for the operations of R.K. Heli-Ski Panorama Inc. (R.K.) are unknown at this time. Many aspects of the proposed project may impact R.K.'s heli-ski operations, including the loss of skiable terrain. As part of the process of addressing R.K.'s concerns, the project committee has decided to commission an independent third-party assessment of this matter during the project report review stage (see <i>Appendix A</i> , section E.5(G) of the finalised specifications). However, this independent assessment will not proceed if there is a prior resolution of this issue between the parties. In the meantime, according to past tenure applications, R.K. has determined that further skiable terrain should be investigated to respond to expanding demands being placed on its business. That R.K. has recently acquired the right to use Crown land in the Glacier and Tenise Creek drainages for heli-skiing purposes is part of the company's business plans, which are outside the scope of this review. The writer should refer the inquiry directly to R.K. (MELP)
#66	<i>Wildlife</i> - No grizzly bear population study is proposed for entire Purcell Mountain ecosystem. Other wildlife species whose habitat will be threatened include black bear, wolverine, marten, mountain sheep, and caribou. All wildlife need to be studied.	With respect to grizzly bears, it is recommended that the specifications be amended to require that the study area be expanded to include Howser Creek for indirect off-site impacts, and Howser and Stockdale Creeks for cumulative effects. Further expansion of the study area is not deemed appropriate, since it is not clear that increasing the study area would improve the results, and may in fact make it more difficult to isolate the changes which may result from the project. With respect to gathering further information on grizzly bear use, specification D.3(C)#12 now requires that hair samples from grizzly bears be collected to provide information on grizzly bear habitat use and grizzly bear numbers, and to make it possible to assess how these may change as a result of the project. Section D.3 of the finalised specifications also addresses many other wildlife impact issues which are deemed relevant to the EA review of the project. (MELP)
#66	<i>Wildlife study zone</i> - Zone of influence should include entire Purcell Wilderness Conservancy, west side of Jumbo Pass, Glacier and Tenise Creek drainages.	Initial terms of reference for wildlife studies were negotiated between the proponent and MELP (BC Environment) during 1993. They included field surveys and habitat mapping in an agreed-to study area, which was confined to the Jumbo Creek valley. However, having received considerable public comment on this issue, MELP agrees that an expansion of the study area into some adjacent drainages is necessary for an adequate assessment of direct and indirect impacts on ungulate populations. In the finalised specifications, the wildlife study area has been enlarged to include upper Glacier Creek and upper Horsethief Creek, above its confluence with Farnham Creek. (MELP)
#73	<i>Draft Specs, Appendix A - #1a</i> - not to present the ministers with a detailed description of the opinions of the public and an in-depth understanding of public issues is to give public opinion less significance than the technical evaluation. The project committee needs to describe the form which their recommendations will take, and the weighting to be given to each of the three	The project committee will not decide on the final structure of its recommendations to ministers until it has reviewed the proponent's project report and received feedback on it from the public. This comment, as written, prejudices decisions which the project committee has yet to make about how it will report its assessment of public views on issues raised during the course of the review. Certainly, it has expressed no intent or made any decision to give less weight to public feedback. Thus, it is not clear on what basis the comment is made. (EAO/project committee)

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#73	<i>Draft Specs, Appendix A – #1e)</i> – Requiring that the proponent's report be organised, integrated and summarised is not the same thing as a concise 10-to-35-page government summary.	Agreed, but the project committee, in what is now section A.5 of the specifications, has clearly indicated that it expects a stand-alone executive summary of the project report. (EAO)
#73	<i>Draft Specs, Appendix A – #1f)</i> - EAO and the project committee are wrong to equate interest groups with the opinions of Kootenay citizens. The PAC would be more representative if it reflected the age, race, education, and socio-economic status of the Kootenay population. Nothing in this response shows that the decision-making power in the review process lies with Kootenay citizens.	Under the <i>EA Act</i> , the final decision on whether or not the project should proceed rests with the Minister of Environment, Lands and Parks and the Minister of Employment and Investment. In making their decision, they will take into account the views of the public, the recommendations of both the project committee and the PAC, and the overall pros and cons of development. There are many conflicting views about an appropriate membership for the PAC. However, as currently structured, it reflects a broad range of interests and perspectives on the project and the issues which it raises, and any restructuring of its membership would still have to achieve a similar balance. (EAO)
#73	<i>Draft Specs, Appendix A – #1h)</i> – Answer doesn't describe the independence, expectations, consistency and thoroughness of the project committee's evaluation of the proponent's assessments.	Agreed, because the original public comment did not raise these issues. Under the EA process, the main burden of technical review of the proponent's various submissions falls on government technical staff. They are expected to conduct their reviews with proper professional detachment and objectivity, based on their agencies' respective mandates, goals, programs and policies. In the absence of appropriate government expertise, independent experts may be hired to advise the project committee. (EAO)
#73	<i>Draft Specs, Appendix A – #2c)</i> – Does not respond to the concepts in the question.	The response to item 2c) in <i>Appendix A</i> was provided in an attempt to explain the manner in which government is pursuing the issues of retaining maximum biodiversity and connectivity for wildlife populations in the backcountry. There is no simple answer to this question, since the issues must be considered in light of the latest land use decisions for the area, as well as in the context of the EA process. The response itself is dated, in that it was prepared before the <i>KBLUP-IS</i> was released in final approved form in June of 1997. The <i>KBLUP-IS</i> provides direct guidance on general resource management direction across the region, plus management guidelines for specific resources (including general biodiversity, connectivity, grizzly bears, ungulates and mountain caribou) which are applicable in specific areas. In addition, <i>Appendix 5</i> of the <i>KBLUP-IS</i> establishes objectives and strategies for a variety of resource values in the Jumbo-Upper Horesethief SRMZ (including commercial tourism values (which the Jumbo Glacier project seeks to make use of), access, recreation, biodiversity and ungulates). (LUCO/MELP)
#73	<i>Draft Specs, Appendix A – #15e)</i> – The answer does not describe what the proponent's application actually says about the market for summer skiing, both today and in the future.	In the project committee's view, the proponent has provided adequate comment on the main tourism products to be offered at the proposed resort. The market for this product, and the viability of the proposed resort, will be the subject of an independent market investigation (see section B.4 of the finalised specifications). (MSBTC/MEI)

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#73	<i>Draft Specs, Appendix A – #15f) – The different product being proposed is left vague and disconnected. A full comparison of this resort’s impacts to Blackcomb is omitted.</i>	The project committee recognises that the proposed resort differs from the Whistler/Blackcomb resort in terms of the products being offered in several important respects. Thus, placing emphasis on comparing the Jumbo Glacier project with experience with skiing on the Horstman Glacier at the Blackcomb resort may well not be of any particular advantage in providing insights. The market and feasibility of the project will be the subject of an independent assessment, which will consider resort experience elsewhere (see section B.4 of the finalised specifications). (MSBTC/MEI)
#73	<i>Draft Specs, Appendix A – #15k) - Instead of demanding further valid information on feasibility and markets, and accepting or rejecting the proponent's study on the basis of the project committee's assessment, it permits the whole review process to continue further into CASP and third-party analysis.</i>	This statement implies that the feasibility and market assessment of this project is being deferred by the project committee to the post-EA CASP process, which is incorrect. Section B.4 of the finalised specifications outlines the intent of the project committee to commission an independent assessment of the project’s marketability and overall financial feasibility. The proponent has already provided extensive information on these aspects of the resort proposal, and provision is made in section B.4 for the proponent to supplement that information, if necessary for the independent assessment to be completed. Terms of reference for the independent assessment have been developed by MELP and MEI (see <i>Appendix A</i> , section B.4 for details). (MELP)
#73	<i>Draft Specs, Appendix A – Analysis of public submissions – In Appendix A, only 47% of public concerns were answered. Wants all incomplete responses completed, all submissions from the public to be collated, responded to and published, and membership on the PAC to be expanded to include Kootenay citizens with an objective outlook.</i>	To expect complete responses to all questions mid-way through the first stage of the review process is not realistic. The project committee will not be in a position to respond to many of the public’s comments on the application until it has had the opportunity to review the proponent’s project report, and the comments received on it. To the extent that it was possible at the time of release of the draft specifications, all public comments on the proponent’s application have been responded to. Within the bounds of a reasonably-sized group, the PAC has a broad enough representation for the purposes of the EA process. (EAO)
#73	<i>Draft Specs, Section D.3(B) – Spec #10 - Why is the proponent not required to document the experience of other ski resorts in completing the required wildlife assessments?</i>	The project committee encourages the proponent to conduct its wildlife assessments with reference to relevant experience at other ski resorts and in other development situations – see for example, specifications D.3(C)#2 and D.3(F)# 3. (MELP)
#73	<i>Draft Specs, Sections E.3 and E.11 - do not address concerns regarding the proportion of direct employment by local and regional people.</i>	This issue is addressed in specification E.3#1, first bullet. (MEI)
#73	<i>Draft Specs, Section E.5(E) - Why is proponent not required to assess successes and trends of US, European and other markets for summer use.</i>	The independent feasibility assessment of the proposed resort (provided for in section B.4 of the finalised specifications) is expected to characterise the ski market and to assess the role of the proposed resort in that market. (MELP/MEI/MSBTC)
#73	<i>Draft Specs, Sections D.3, E.5, E.6(B) – Do not address either spiritual values or intrusion of project into wild places, as expressed in items #14j) and #14o) of Appendix A.</i>	The project committee recognises that many people associate spiritual values with wilderness settings. However, given the difficulty inherent in evaluating project impacts on people’s highly variable spiritual values, the committee has focused assessment requirements on the underlying backcountry values which contribute to the spiritual experience. These values are more readily amenable to systematic evaluation (e.g. impacts on aesthetics, on wildlife and recreational settings, and ambient noise levels). (MSBTC/EAO).

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#86	<i>Panorama resort</i> – Given the proposed upgrading of the Panorama resort, the proponent should consider the developmental history of the area, environmental and socio-economic issues raised by that project, and any public funding requirements. The Panorama resort has not been profitable as a ski area. The Jumbo Glacier project would only be profitable as a real estate venture. In section E.8, the project committee makes such a study a voluntary request. Panorama’s management may have concerns about providing such information to a competitor, but assessment is essential.	The project committee favours the voluntary approach indicated in the draft specifications. The proponent may choose to draw from experience at Panorama and other resorts if it deems that this is the best way to assess issues (e.g. as indicated in section E.8 of the finalised specifications). It is also recognised that the history of the Panorama resort and its commercial performance may not be fully relevant to the Jumbo Glacier project (e.g. different economic circumstances at the time of development, different target markets, different project facilities and skiing opportunities, etc.). As to the issue of concerns over the commercial success of Panorama and possible parallels for this project, the performance of other ski operations will form part of the independent feasibility assessment which the project committee is commissioning (see section B.4 of the finalised specifications). MEI points out that recent new investment by long-time ski area operators and knowledgeable and experienced Canadian and international investors, being made at Panorama, Fernie, Sun Peaks, Big White and Mount Washington resorts, among others, indicates confidence that these projects represent a reasonable risk in terms of return on investment. This is similarly reflected in current active investor interest in resort development opportunities at Kimberley, Golden, Lillooet, Squamish and Revelstoke. (MEI/MELP)
#86	<i>Other studies</i> - the project committee should examine the work of the East and West Slopes Grizzly Bear Projects and the Bow Valley Study. Should also look at the Alberta Natural Resources Conservation Board hearings on the Three Sisters resort proposal.	The draft specifications in section D.3(C) have been amended to require the proponent carry out a review of existing literature from BC and adjacent jurisdictions, including the northwestern USA, to identify, describe and assess the effectiveness of mitigative strategies and techniques applicable to land use impacts on grizzly bears – see specification D.3(C)#11. (MELP)
#86	<i>Glacier skiing resorts in Europe</i> - the project committee should examine environmental, socio-economic and the broad spectrum of cumulative effects of existing glacial resort developments in Europe.	It is beyond the scope of the EA process to undertake a broad systematic assessment of the impacts of glacial skiing resorts in Europe. For the purposes of environmental assessment, while comparisons might be interesting, they cannot be used conclusively. The environmental setting for each ski resort is unique. (MELP)
#88	<i>Grizzly bears</i> – The project committee does not seem to require research of local activities, movements and habitat use of bears through the use of radio collars or global positioning systems collars, nor to do repeat population sampling to indicate the turnover in the individual bears which use the Jumbo valley. The importance of taking these approaches is that habitat suitability or capability may provide a very incomplete picture of the value of the area to bears. Will not indicate key denning or mating sites, or whether Jumbo is a bottleneck through which bear movement is funnelled, or where bear activity is actually concentrated. Need to address potential effect on genetic viability of several wildlife populations in the	Concern regarding a perceived over-reliance on habitat capability assessments as a means of determining the potential effect of the project on grizzly bears was raised by many reviewers. In response, the specifications have been amended to require that hair samples of grizzly bears be collected to provide information on grizzly bear habitat use and grizzly bear numbers, and to form a baseline for monitoring how these may change as a result of the project – see specification D.3(C)#12. It should be noted that MELP considers radio-collaring to be too intrusive as a grizzly bear monitoring method. (MELP)

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#88	<i>Solid waste</i> - Even with good waste management practices, bears will be attracted to the odour of garbage, barbecues and restaurants. Would be appropriate for proponent to identify other mountain resort communities which have successfully prevented bears from being attracted. Within the waste management section of the specifications, need to discuss the impacts on the Columbia valley of the increasing amount of Crown land needed for a larger landfill than would otherwise be required. Need to assess increased risks, smell, wildlife problems, and blowing garbage from a larger landfill.	In section D.1(A) of the specifications, MELP has requested that the proponent provide an acceptable solid waste management plan for the Jumbo Glacier project. This plan should meet MELP and RDEK goals to reduce, re-use and recycle solid wastes. Confirmation is required on how the proponent will deal with residual wastes, that is, whether the RDEK landfills will be used, or whether a landfill/incinerator will be part of the project. The development of a wildlife-proof residual waste management system is an essential part of this waste management plan. RDEK notes that any decision to proceed or not proceed with the project will not materially affect programs set out under its Regional Solid Waste Management Plan. Neither of the two main issues - landfill space/capacity and operational considerations (smell, wildlife conflicts, etc.) – are considered limiting by RDEK, which must select a new landfill site for the upper Columbia valley, regardless of the decision on the project. To meet long-term needs, the largest site practicable will be preferred. Operational standards are subject to provincial regulation. (MELP/RDEK)
#88	<i>Equestrian facilities</i> - Should require proponent to take account of developments that are not in the current plan, but which are expected to be developed in the future, such as the equestrian facility.	The proponent has categorically withdrawn its original proposal for equestrian facilities as part of the overall resort project. Thus, this facility is no longer subject to assessment. This approach is being adopted by the project committee for any feature of the original project proposal which has now been withdrawn. If the proposal is revived at a later time, following project start-up, it will be subject to the review regime in effect at that time (see <i>Appendix B</i> , section 6.8 of the specifications). (MELP)
#92	<i>Wildlife</i> - Disputes logic of asking proponent to document wildlife enhancement plans to deal with wildlife impacts which should not be permitted. Concerned that the specifications refer to the proponent negotiating with MELP on wildlife issues, when MELP, with its expertise, should simply direct the proponent on what is required. What happened to the MELP Wildlife Branch proposal for 2-year grizzly bear study?	Given the long-term nature of the Jumbo Glacier project, habitat enhancement will not likely be acceptable as compensation for unmitigatable impacts on wildlife resources. MELP would not support enhancement of adjacent wildlife habitats as mitigation or compensation for project impacts on wildlife. Wildlife enhancement generally refers to forest or vegetation manipulation to improve forage/cover habitat values. These are appropriate techniques to offset relatively short-term impacts of projects such as mines, until a permanent solution can be provided through site reclamation. Reclamation is not an option in a project of this size and longevity. See above, response to submission #64 (<i>Grizzly bears</i>), with respect to grizzly bear assessments. (MELP)
#92	<i>Costs to taxpayers</i> - How much will project cost the taxpayer?	The issue of costs to government is covered in the specifications – see sections E.7 and E.8. Note that the focus of the reporting requirements is on larger incremental impacts, not on minor or inconsequential cost items. In some cases (such as noted for schools and social services), the demands for government services are not expected to increase provincially as a result of the project, and the associated funding issue is considered to be more of an issue of re-distribution of expenditures within the province. (MEI)
#92	<i>Cumulative effects</i> - draft specifications omitted cumulative effects on flora and fauna, and on community.	If CEAA is triggered, evaluation of cumulative environmental effects is required by law (see <i>Appendix A</i> , section H.2). In any case, assessment of cumulative effects on grizzly bears is highlighted in section D.3(C) of the finalised specifications, and is required irrespective of whether or not CEAA is triggered – see both <i>Volume 1</i> and <i>Appendix A</i> . The project committee notes that, under CEAA, there is no federal jurisdiction to evaluate issues which do not stem from environmental effects, such as many of the project's potential social and

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#92	<i>Use of salt</i> – Need to address concerns re. use of salt.	See above, response to submission #63 (<i>Use of salt</i>) on this issue. (MELP)
#92	<i>Project viability</i> – what are impacts on existing low-impact tourism businesses? Need to evaluate levels of use of present ski resorts in BC, and land speculation.	The purpose of this environmental assessment is to determine the impacts of the proposed resort on the surrounding area, including the possible impacts on lower-impact tourism such as heli-skiing. Section B(4) of the specifications provides for the proponent's market analysis to be subject to an independent assessment, which will consider the proponent's projections of the impact of project development on visitor levels at other ski resorts in the region, notably the Panorama ski resort. This will include an assessment of the projected visitor profile for the project (which is expected to differ from that at other resorts in BC), and the demand and capacity for comparable skiing in BC, and in other relevant competing areas. (MELP)
#94	<i>Definition of study area</i> – Should include the Purcell Wilderness Conservancy (PWC) in study area.	There was considerable comment received from the public and the PAC with respect to the boundaries of the study area, particularly for wildlife assessments. There was particular concern that the study area did not take into account potential impacts of the proposal on wide-ranging wildlife populations in adjacent drainages. MELP has considered the comments received, and agrees that expansion of the study area into some adjacent drainages (upper Glacier Creek and upper Horsethief Creek, above its confluence with Farnham Creek) is warranted for an adequate assessment of direct and indirect impacts on ungulate populations. With respect to the PWC, section E.5(B) of the specifications addresses the potential for increased backcountry use of the area. MELP believes that the Jumbo Glacier project will result in some hikers going into the PWC for day and overnight trips. Thus, specification E.5(B)#1 requests the proponent to develop a resort client profile which characterises client numbers and demographics, as well as the type of recreational activities (and projected use levels) which resort clients will be interested in pursuing, in addition to skiing. MELP will use this information to evaluate for itself the likelihood of increased visitors to the PWC. (MELP)
#94	<i>Full cost accounting</i> - There should be full cost accounting of project impacts.	See above response to submission #46 (<i>Economic assessments</i>) on the issue of assessing costs and benefits. (MEI)
#100	<i>Wildlife</i> - GIS mapping by an impartial firm should be required. Would suspect pro-project bias in habitat and impact maps produced by proponent. Wording in draft specifications D.3(C) #4 and #5 and D.3(F) #2, D.2(A) #1 and D.3(B) #10 are imprecise and leave room for biased assessment. Surprised by the absence of any specifications for new wildlife studies, with proponent expected to rely on existing work.	The proponent's biophysical habitat baseline mapping is comprehensive in nature, and will provide useful baseline habitat information necessary for the evaluation of the project's potential impacts on wildlife habitats and populations. Baseline mapping is the first step for the proponent in its overall task of reviewing maps and collected data, and preparing an impact assessment and analysis for review by the project committee. MELP reviewed the fisheries and wildlife resource specifications which are identified in submission #100, and asked its independent grizzly bear expert, Ben van Drimmelen, to review those noted here from section D.3(C) - <i>Grizzly Bears</i> . Where it was felt that specifications were imprecise, or that there was room for a specification to be misinterpreted, wording changes have been made. The wildlife impact assessment work has still to be completed by the proponent. Once complete, the proponent and MELP will be able to determine if there are any special wildlife habitat features identified which may require further study. At this time, only habitat capability mapping has been completed. Assessment of collected information has still to be completed, and the study area for ungulate evaluation has now been expanded. (MELP)

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#109	<i>Noise</i> - Section E.5(D) makes no mention of noise impacts beyond the immediate area to be developed.	Based on concerns expressed by the public, the proponent is being asked to address the extent to which noise could extend to any significant distance beyond the boundaries of the proposed resort. The project committee is focusing on the implications (if any) of on-site noise for surrounding backcountry use. (EAO/project committee)
#109	<i>Air transport noise/volume</i> – Section E.7(L) of the draft specifications provides no means for determining what level of noise is significant. On what basis does the project committee agree (per page 200) with proponent's conclusion that there would not be any dramatic increase in air traffic at Fairmont. Even if true, increased helicopter use will significantly raise noise levels.	In the draft specifications (page 200, section E.7(L)), the project committee did indicate that the proponent's estimates of low project-related air traffic at Fairmont Airport seem realistic, based on the scenarios documented by the proponent in its application. However, other possible combinations of number of flights and plane sizes are possible. In the draft specifications, the committee went on to comment that some supporting analysis is needed. The feasibility of service by large jets to and from Fairmont Airport would be a function of the price and demand for the service. Factors which would affect price include airport capability, airport costs, regulatory safety approvals, environmental approvals, reliability factors (e.g. weather-related), routings and types of aircraft in use. The finalised specifications reiterate the original reporting requirements, which were intended to clarify both air traffic volumes at Fairmont (see specification E.7(L)#3) and frequency of helicopter use at the resort (see specification D.3(F)#4). Noise at Fairmont Airport from aircraft use is not expected to change significantly from present levels, if the frequency of use projected by the proponent is confirmed by analysis. (MEI/MELP)
#109	<i>Wildlife</i> - Concerned about the project committee's dismissive attitude toward threatened and endangered species. Views any mitigation plan (pages 105 and 110 of the draft specs) with scepticism. How can impacts be avoided when displacement of wildlife and loss of habitat are inevitable? At what point do these losses become acceptable? Has there been a mitigation plan related to a development of this nature which has proven successful? On page 105, the project committee suggests that loss of endangered and threatened species is acceptable, providing that the proponent monitors the loss. Why are these studies time-limited? Monitoring is not an acceptable solution.	The comment reflects a misunderstanding of the draft specifications. Disagree that the project committee has dismissed this issue, or that the draft specifications imply that losses are acceptable if monitored. Acceptability of adverse impacts is a matter for ministers to decide, based on their ultimate view of the overall benefits and costs of the project. The role of the project committee is to provide the ministers with its assessment of what those benefits and costs (e.g. to wildlife) will be. Having said that, MELP has revised and clarified section D.3(E) of the draft specifications – <i>Threatened or Endangered Wildlife</i> . In addition to the possible occurrence list requested in the original terms of reference for this project, work is required to identify habitat features for threatened or endangered species which are present in areas to be directly impacted by the construction and operation of the resort facility. Proposals for mitigation plans are also required for MELP review. Attention needs to be focused on the village site, resort buildings, tower locations and any ski runs located off the glaciers. (MELP)
#110	<i>Air traffic</i> - Main concern centres on transportation to/from resort. Proponent seems uncertain how much air traffic will be required to service the resort. Jet flights from Fairmont would increase. The sound of helicopters and jet planes will escalate over time, creating an intolerable situation. An undetermined number of flights into Fairmont, Cranbrook and Calgary	Regional transportation issues of the type mentioned here have been identified by the project committee as requiring further clarification – see section E.7(L) of the specifications. Regarding heli-hiking, the project proposal in the proponent's application does not include any helicopter-supported recreation activities, such as heli-hiking, although third-party operators may opt to be based at the resort, if they can obtain government approvals to operate. See also response to submission #109 (<i>Air transport noise/volume</i>). (MEI)

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#121	<i>Review timeframe</i> – Project of this scope needs a longer time for the public to respond.	See response to submission #40 (<i>Time for review</i>), above. (EAO input)
#121	<i>Draft Specs – Section C.2</i> - Proponent should be more specific in addressing safety issues re. crevasses, ice falls and out-of-bounds skiing. <i>Spec #3</i> - what does 'limited' mean? Define/quantify. <i>Spec #4</i> - need detailed analysis of snow conditions, including amounts, type of surface and how each will be managed. <i>Spec #5</i> - Impacts on Lake of the Hanging Glacier and Horsethief Creek drainage must be addressed, as impacts from glacier modification would be greatest here. <i>Specs #6 and #7</i> - should address what will be used to modify glacier's surface, why it must be done, how much reshaping will be required, what the visual impacts will be, and what impact this will have on glacier hydrology. Specific thought should be given to addressing the impact of dynamite on glacier movement.	With respect to safety matters, the proponent has indicated that no glacier modification of any sort is required, and especially of the type with respect to which the public has expressed concern. In particular, there will be no use of explosives, bulldozing or significant salt or fertiliser application. Glacier management will entail primarily installation of surface lifts, conventional ski area grooming practices, temporary lift, run and natural hazard markers, and the installation of log rafts to bridge selected crevasse areas on the glacier surface, where necessary for access purposes. The surface of the glacier will be maintained in order to keep it safe and usable for skiers. In addition, ski patrols will be on duty in order to ensure the enjoyment and safety of the public. Specification C.2#1 requires the proponent to reaffirm that its intent is to manage glacier skiing sites largely by means of conventional ski slope grooming techniques, complemented by routine on-site ski area management and regular ski area patrolling to identify problem locations. The project committee has reviewed the issue of glacier use in light of the proponent's assurances that glacier modification is not intended, and has concluded that there remain no strategic issues with respect to glacier grooming which require attention during the EA review of the project. Thus draft specifications C.2#2 to #7 have been deleted from the finalised specifications. If the project is approved under the <i>EA Act</i> , the remaining glacier grooming issues, which are routine, will be addressed in the course of developing the CASP ski area master plan. (MELP/MEI)
#121	<i>Draft Specs – Section C.4</i> - Should address various types of building materials/construction which could be used to minimise impact and loss in case of wildfire. Proponent should apply risk analysis to determine the type of fire-fighting capabilities required.	This is an issue for detailed planning. Conceptual/strategic wildfire risk and management issues need to be assessed under section C.4 of the specifications. If the project is approved at the conclusion of the EA process, details of building design and construction materials, and also fire-fighting capability, would be addressed during the development of the CASP ski area master plan and the regional district (RDEK) OCP. (MoF)
#121	<i>Draft Specs – Section C.5</i> - Should consider: ice loading and exposure to wind from the west; exposure of the top return station terminal; special carriers which may be required for items such as water, food, fuel and garbage; effect of snow creep on towers; and avalanche risks affecting towers along the lift line from the east side. Uneven ice movement may create problems for tower structures. Should document successes or failures of glacier skiing at other resorts.	All of these issues are addressed as part of the regulatory permitting process for proposed ski lift locations. None are viewed as raising concerns which call into question project acceptability, and which are therefore in need of attention during the EA process. See section C.5 of <i>Appendix A</i> to the finalised specifications for further details. (MMA)

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#121	<i>Draft Specs – Section C.6</i> - Proponent should document its 'green' policy.	Proponents are expected to develop projects in compliance with the laws, regulations and government policies in effect when development is undertaken, including those which pertain to environmental management and protection. Where issues of environmental acceptability have been raised in this review, they are addressed in other sections of the specifications, and the project committee, on reflection, sees no value in insisting that the reporting required elsewhere be re-packaged to address the resort's 'greenness'. Thus, the project committee has deleted draft specification C.6#1. (MELP)
#121	<i>Draft Specs – Section D.1(A) – Spec #3</i> - Should provide detail of bear-proofing. <i>Spec #5</i> - Concerned that proponent may change position on elimination of equestrian facilities. What guidelines are in place to prevent this? Should address MELP's concerns about the release of nutrients contained in runoff into local water supplies.	Section D.1(A) of the specifications requires the proponent to address bear-proofing issues in general terms in its waste management plan. If the project is granted approval, specific detailed bear-proofing measures will have to be mutually agreed upon between the proponent, RDEK and MELP at the pre-construction stage, and will have to incorporate state-of-the-art technology which is available at that time. The proponent has stated conclusively that equestrian facilities have been withdrawn from the project - see above, response to submission #88 (<i>Equestrian facilities</i>). With respect to nutrient runoff, specification D.1(B)#6 addresses the need to examine nutrient runoff issues, in the event that the proponent opts for discharge of treated wastewater to Jumbo Creek. (MELP)
#121	<i>Draft Specs – Section D.1(B) – Spec #1</i> - Must address collection, treatment and disposal of domestic effluent, and stormwater/ snowmelt runoff from all components.	Agreed and provided for in specification D.1(B) #1, which states that, in the project report, the proponent must "...include a plan for liquid waste disposal which is similar to a Liquid Waste Management Plan, and which considers all aspects of liquid waste treatment and disposal..." (MELP)
#121	<i>Draft Specs – Section D.1(D) – Spec #1</i> - Identify location and exposure of fuel storage sites. Present conceptual plans for the storage of all fuels, including control structures to contain spills, and mitigation plans.	Section D.1(D) has now been combined with section D.1(C), which originally only addressed special wastes. MELP wishes to ensure safe storage, handling and transportation of special wastes and fuels, and minimisation of the risk of releasing special wastes and fuels into the environment. The project committee feels that this can be accomplished by seeking a commitment in the project report to provide information on fuel storage sites prior to project development activity. The decision to opt for a commitment, rather than firm details, in the project report is based on two factors: (1) siting of such caches should raise no strategic issues, given the existence of widespread proven practice; but at the same time (2) there is no formal permitting process for these facilities, hence the need for a binding commitment. (MELP)
#121	<i>Draft Specs – Section D.1(F) – Spec #3</i> - How much salt will be used, how will it be spread, and how will impacts be mitigated? <i>Spec #4</i> - add to this any impact on associated drainages, especially Lake of the Hanging Glacier and Horsethief Creek. <i>Specs #12, #13 and #14</i> - Nutrient impact should be assessed for full project, including equestrian activities and golf course. How does removal of certain components of the project or lack of details on how something will be achieved affect the viability of the project?	The proponent has stated that salt will not be used to groom ski runs at the Jumbo Glacier resort for regular operations, although it is possible that, on some of the few days when ski races are held, race organisers may feel that salt application is warranted to improve skiing conditions. The proponent has withdrawn equestrian activities and the golf course from the project proposal. Thus, these facilities are no longer subject to assessment. This approach is being adopted by the project committee for any feature of the original project proposal which has now been withdrawn. With respect to nutrient runoff, specification D.1(B)#6 addresses the need to examine nutrient runoff issues, in the event that the proponent opts for discharge of treated wastewater to Jumbo Creek. It is conceivable that the removal of certain components of the project could affect its viability. The project committee is commissioning an independent feasibility assessment of the project – see section B.4 of the specifications – and this assessment will focus on the final form of the project proposal for EA decision making purposes. Thus, it will be based on excluding the withdrawn facilities. The level of detail

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<i>(Cont'd from previous page)</i>		available to the project committee on individual project components is an matter which the project committee takes into account in evaluating each component. Where warranted, the committee is seeking more information in the project report specifications on both the project description and the assessment of impacts. The committee's goal is to have enough information to advise ministers of whether or not, in its opinion, issues raised by the project, as proposed, can be resolved. (MELP/EAO)
#121	<i>Draft Specs – Section D.1(G) – Spec #1 - add PM₁₀ of Level A as recommended by MELP for the benefit and longevity of the resort. Consideration should be given to a total ban on use of wood-burning stoves/fireplaces.</i>	MELP has advised the project committee that it does not anticipate significant off-site transport of air pollutants from the project site if the resort proceeds – see section D.1(E) of the finalised specifications, <i>Volume 1</i> and <i>Appendix A</i> . Those emissions which might be expected to affect PM ₁₀ levels in the vicinity of a ski resort normally originate from wood burning (heating, clean-up fires), internal combustion engine exhaust and natural gas combustion (heating), and do not require permits under the <i>Waste Management Act</i> . Since MELP has no regulatory authority with respect to air quality, once a project is approved or when a resort is built, air quality is an issue which is being given consideration during the EA process. For its part, the proponent has advised MELP that it does not plan to install wood-burning fireplaces or wood-burning stoves in every residential unit. Some fireplaces may be installed in the common areas of the hotel, and in a number of residential units, but it expects the number of fireplaces to be limited by the terms of its ski area master plan. (MELP)
#121	<i>Draft Specs – Section D.2(A) – Spec #4 – Should identify water sources for the entire project and their seasonally adjusted rates. Spec #8 - Snowmaking should be moved out of conditional category, and into area that must be addressed.</i>	With respect to water supply, MELP requires a water supply plan for the resort in the project report. The plan must take into account adequacy and long-term reliability of proposed water sources, based on hydrological analysis and well-founded estimates of demand for the fully developed resort. It must also include an overview of the main components of a water treatment and storage system. The proponent has indicated that the resort will rely entirely on groundwater supply. Thus, potential impacts of groundwater withdrawals on streamflows and on fish, fish habitat and downstream water users must be assessed. MELP is seeking assurance that the proponent will have sufficient water to meet demand at the resort at full build-out, without fish habitat losses or significant impacts on fish populations or downstream waters users. With respect to snowmaking, the proponent's proposal does not include this activity. The project is at such a high elevation that snowmaking will not be necessary. (MELP)
#121	<i>Draft Specs – Section D.3(A) – Spec #1 - Add Horsethief drainage and the need for evaluation of all fish species.</i>	MELP has recommended to the project committee that the specifications in section D.3(A) not incorporate this proposed addition, since there is no basis to suppose that the project could lead to direct impacts on fishery values in the Horsethief drainage. (MELP)
#121	<i>Draft Specs – Section D.3(C) – Specs #1 to #12 - All assumptions used in the US Forest Service Grizzly Bear Cumulative Effects Model should be included in project report. Grizzly bear study in Jumbo Creek valley and adjacent surrounding drainages should include habitat, food sources, bear movement, denning sites, conflicting habitat usage, impact of habitat loss, mortality and</i>	The specifications have been amended to make it clear that the assumptions required to apply the cumulative effects assessment model must be reviewed by a panel of grizzly bear experts – see specification D.3(C)#10. This will ensure the effective application of the model, whether the assessment is conducted by the proponent or by MELP. (MELP)

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#121	<i>Draft Specs – Section D.3(E)</i> – Should be required to establish a baseline from field studies of endangered or threatened species prior to project approval.	See above, response to submission #109 (<i>wildlife</i>). (MELP)
#121	<i>Draft Specs – Section D.3(F)</i> - Provide details of the extent to which the existing access corridor will have to be modified. Should minimise the width of the utility/access corridor.	Section E.6(C) of the specifications requires that the proponent provide further information in the project report on the extent to which the existing access corridor will be modified and upgraded. The project committee will not be in a position to respond further to the question raised here until the proponent submits this design information in the project report. (MELP)
#121	<i>Project plan</i> - Need a detailed project plan/description in the project report.	The requirement for a detailed project description is stipulated in section A.2 of the finalised specifications document. (EAO)
#121	<i>Data collection</i> - Should stipulate that all data must be properly and completely collected and analysed.	The finalised project report specifications stipulate the data collection requirements which must be complied with in preparing the project report. As a check, the <i>EA Act</i> provides for an initial screening of a project report by the project committee, when first submitted, to ensure that it generally meets the intent of the specifications. If not, the report will be returned to the proponent for upgrading, prior to being accepted for formal detailed review. (EAO)
#121	<i>Conservancy</i> - Specifications do not address fully the need for this project, or how the development of this project in a buffer zone will impact the Purcell Wilderness Conservancy (PWC). Does not address how increased numbers and greater backcountry penetration will impact the adjoining PWC.	The PWC is one of the few parks in British Columbia classified as a 'Wilderness Conservancy Park', and the park master plan refers to 'minimal development', 'minimum use', 'rustic', etc. MELP recognises that there could be spin-off activities associated with the Jumbo Glacier resort, since access to the area will be improved, and that this could lead to increased visits to the PWC. The proponent has stressed that it expects most of its clientele to be unlikely to leave the confines of the resort. Moreover, it has pointed out that the PWC is not contiguous to the resort, and, at its closest, is 7 km away, across rugged terrain. MELP is seeking additional reporting on the profile of the resort's clientele, and any spin-off activities which could encourage resort visitors to enter the PWC (and their expectations, if they do so). MELP will itself assess the resort's client profile information and its implications for use of the PWC– see section E.5(B) of the finalised specifications document. (MELP)
#121	<i>Wildlife</i> - assessment of importance of Jumbo Pass as a wildlife migration corridor is needed. Need to address how establishment of permanent residences in a main east/west wildlife corridor will impact wildlife movement and how it will be mitigated. Potential impacts of project development on wildlife populations in the drainage due to loss of habitat, harassment and displacement of wildlife, and direct human/recreation conflicts, need to be addressed. Proponent should	None of the facilities proposed for this resort are located in the Jumbo Pass itself; thus they will not physically block wildlife movements in the pass. There is expected to be some upgrading of the existing Jumbo Creek road below the pass, but other than that, the nearest new facilities (ski terrain facilities such as lifts and runs) would be located more than 2 km away to the north. Having said that, reporting requirements incorporated into sections D3(B) and (C) of the specifications are designed to examine the extent to which Jumbo Pass is currently used as a wildlife corridor, and to assess indirect effects on wildlife (habitat disturbance, harassment and displacement of wildlife) as a result of increased human presence, etc. Various subsections of section D.3 address a range of wildlife issues in addition to the Jumbo Pass issue. Other sections of the specifications also address the other issues mentioned, including avalanche issues (sections C.3 and E.6(D)), and deforestation,

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#122	<i>Purcell Wilderness Conservancy</i> - Future of tourism in BC depends on wilderness wildlife and small business, and resort would detract from them, and seriously degrade the quality of the PWC.	Tourism issues, including impacts on existing small backcountry businesses, are addressed in sections E.5(A), (E), (F) and (G) of the specifications. See above, response to submission #121 with respect to PWC issues (<i>Conservancy</i>). (MELP)
#122	<i>Wildlife</i> – Project site is east/west migration route. Project would put too much pressure on wildlife, and cause displacement/death of animals. Area functions as sanctuary for species that live there.	See above, response to submission #121 respecting <i>Wildlife</i> . (MELP)
#122	<i>Socio-economic</i> - Specifications were weak in recognising all socio-economic impacts. Small business would lose. People visit Canada because of the mystery, not the access.	The project committee is satisfied that the scope of the socio-economic assessment requirements in section E of the finalised specifications is broad enough to address the issues raised by this comment. (MSBTC/MEI)
#122	<i>Public advisory committee (PAC)</i> - PAC membership is too narrow. No one represents West Kootenay mountaineering community.	Given the range of interests involved in this review, it is not possible to provide a separate seat for everyone of them on the PAC. The PAC already consists of 11 members, 3 of them from the West Kootenay. A variety of backcountry use interests are represented. (EAO)
#124	<i>Responsibilities for studies</i> - Funding for investigations and report-writing should come from the proponent, but government should be closely involved in the selection of people contracted to do the work, in management of the contract, and in interpretation of the results.	As in all other jurisdictions in Canada, and in many other jurisdictions in the world, British Columbia's EA process assigns to proponents the responsibilities to commission, fund and manage most of the studies required for EA reviews. In exceptional circumstances, the project committee may commission independent expertise – see for example sections B.4 and E.5(G) of the finalised specifications. The role of government normally lies in reviewing the proponent's assessments, when submitted, including its study methodologies and results interpretation. Where not satisfied, government agencies may request that the proponent rework some aspect of its assessment, or, less commonly, may opt to do so itself. (EAO)
#124	<i>Wildlife issues</i> - Wildlife studies should include investigation of both regional and local wildlife impacts. Proponent should produce, for key species, an analysis of effects on travel and dispersal, and on long-term gene flow and population dynamics. Should be done in	The many wildlife issues which have been raised by this comment are addressed throughout section D.3 of the specifications document. Impacts on the PWC are addressed in section E.5(B). Alternatives for ski resort development at the site would have been considered during the first stage of the CASP process, which led to selection of this particular development concept for further more detailed review by interested parties. Respecting this issue, see also the response to submission #46 (<i>Alternative resort locations</i>), above. (MELP)

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#124	<i>Project revenues</i> - Should produce an account showing where the income from this development will accrue.	The project committee agrees that this is an issue in terms of impacts of the project on the local community and region. The issue is addressed in specifications which require assessments of employment and income effects (E.2) and spin-off impacts (E.4). (MEI)
#125	<i>Sewage</i> - Specifications require an analysis of sewer requirements for the entire project rather than phase 1 alone. Inability to dispose of sewage will pre-empt the project.	MELP requires the information indicated in section D.1(B) of these specifications to assess whether or not the proponent's proposed liquid waste treatment facilities for the resort are adequate, given the site constraints in the valley and the phased construction of the project. Key issues include the provision of adequate ground disposal systems for secondary-treated or tertiary-treated wastewater, and the preparation of a liquid waste management plan for the project. Chemistry and physical capability of the soil to handle wastewater are critical. The objective is to avoid impacts on water quality and fisheries. More detailed information will also be required at the permitting stage, if the project is certified under the EA process. (MELP)
#125	<i>Water supply</i> - Sourcing 20 l/s of water is unresolvable problem.	See above, response to submission #121, <i>Draft Specs - section D.2(A) - Spec #4</i> . (MELP)
#125	<i>Access road</i> - Problems with avalanche hazard along the access road are grossly understated.	Comment does not fairly reflect the proponent's work to date. Avalanche assessments performed for proponent by P. Schaefer (of Stetham and Associates, dated November 30, 1995 and May 18, 1997) fairly and completely assess the hazard along the highway corridor. His assessment is consistent with other BC highway corridor assessments, and the hazard is typical of a mountain highway in BC. The consultant, who is Canada's foremost expert in this field, makes recommendations for alignment changes which will further reduce the risk, and also proposes methods to mitigate and manage the hazard. (MoTH)

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#125	<i>Wildlife impacts</i> - Mitigation of wildlife habitat impacts is not reasonable or even plausible.	The project committee is not yet in a position to draw firm conclusions on this issue. Specifications in section D.3 are designed to investigate this matter. (MELP)
#125	<i>Wildlife study area</i> – Should be much larger.	See above, responses to submissions #66 (<i>Wildlife study zone</i>) and #94 (<i>Definition of study area</i>). (MELP)
#126	<i>Grizzly bears</i> - MELP considers the Jumbo Creek drainage to be important for grizzly bears, as noted in its Regional Biodiversity Strategy. Disagrees that it is difficult to apply objectives in MELP's <i>Grizzly Bear Conservation Strategy</i> on a site-specific basis to projects like Jumbo.	The direct, indirect and cumulative impact assessments required in section D.3(C) of the specifications, supplemented by the proposed addition of genetic analysis of hair samples to provide information on grizzly bear habitat use and numbers, and to monitor how these may change as a result of the project, will provide sufficient information to be able to determine the potential effects of the project on grizzly bears, and whether or not opportunities to prevent or mitigate any adverse effects exist. (MELP)
#127	<i>Definition of study area</i> - History has shown that this scale of development is incompatible with grizzly bears. Can't just rely on our parks to provide critical habitat needed for bears. These animals range much further than park boundaries.	The specifications have been amended to require that the grizzly bear study area be expanded to include Howser Creek for indirect off-site impacts, and Howser and Stockdale Creeks for cumulative effects. Further expansion of the study area is not recommended since it is not clear that increasing the study area would improve the results, and may in fact make it more difficult to isolate the changes which may result from the project. (MELP)
#127	<i>Impacts on Conservancy</i> - Need to recognise impacts on neighbouring ecosystems, specifically the PWC. Project will compromise intent of PWC.	See above, response to submission #121 (<i>Conservancy</i>). (MELP)
#127	<i>Wildlife studies</i> - Long-term studies are needed to ensure that environmental impacts from development do not destroy the long-term populations of all species within the project area. Specifications do not mention goats, and deal insufficiently with small mammals and birds.	MELP has re-examined draft specification D.3(B)#1 and the aerial and ground wildlife survey information contained in <i>Volume 5</i> of the application. MELP is now satisfied that the proponent has met the wildlife field survey requirements identified in the terms of reference developed with the proponent in 1993. That includes mountain goat field survey information. Several letters from the public referred to a lack of information on goats in the area. However, MELP does not feel that there is a need for additional surveys of goats. The initial survey results are consistent with what MELP biologists would expect for goats in the area. Follow-up goat mapping and assessment work continue to be required in section D.3(B). (MELP)
#131	<i>Wildlife studies</i> – Understood there would 2-3-year grizzly bear study to determine population densities, but this is omitted from draft specifications. From work on caribou and wolverine projects, is aware of impact of human developments on these animals.	See above, response to submission #64 (<i>Grizzly bears</i>). (MELP)
#131	<i>Definition of study area</i> – Data are needed for a larger area than the Jumbo-Upper Horsethief Special Resource Management Zone (SRMZ). Project will cut off a wilderness corridor connecting the PWC with the northern protected areas. Cutting off the south will further isolate and fragment wide-ranging animals (e.g. caribou, grizzly bear and wolverine).	The project committee agrees that the land use planning assessment requirements outlined in what is now section A.7 of the specifications should extend to the Upper Glacier Creek SRMZ also. With regard to the wildlife study area, also see above, responses to submissions #66 (<i>Wildlife study zone</i>) and #94 (<i>Definition of study area</i>). (MELP)

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#131	<i>Access road costs</i> – Concerned about cost to taxpayer incurred in connection with building and maintaining an access road, and avalanche control along the road.	Road upgrading and maintenance requirements (including avalanche control) are being addressed through the EA process (see sections E.6(C) and (D) of both <i>Volume 1</i> and <i>Appendix A</i> of the specifications). Estimating costs for road upgrading and maintenance are included in the reporting requirements, although the respective funding responsibilities of the proponent and the province may not be fully clarified through the EA process – see discussion in <i>Appendix A</i> , section E.7(M). (MoTH)
#133	<i>Grizzly bear studies</i> - Specifications on grizzly bear studies and other wildlife species need to be much more comprehensive. Quality wildlife research demands several years of work. Specifications must coincide with the priorities identified by the province's grizzly bear strategy. Believe that adverse effects on many wildlife species cannot be mitigated. The provincial grizzly bear strategy states that "...recreational development located in prime bear habitats cannot be designed to have no or minimal impacts..."	See above, response to submission #126 (<i>Grizzly bears</i>). (MELP)
#133	<i>Other wildlife studies</i> - Need to study movement and distribution of wildlife populations.	Section D.3(B) of the specifications requires that, in its project report, the proponent provide information which will complete the baseline inventory, in order to assess potential impacts of the project on wildlife populations and habitats, both during construction and for the life of the project. (MELP)
#133	<i>Lifestyle impacts</i> – Most people who oppose the project are opposing a lifestyle change that is inevitable with the construction of a substantial project. It is of little value to ask proponent to itemise any changes to lifestyle, given proponent's frame of reference.	Reporting on the individual elements of lifestyle effects will allow the project committee to draw its own conclusions on their significance, both individually and collectively. The experience of the Invermere area with respect to the development of the Panorama ski resort in the last 20 years may provide a useful datum against which to evaluate many of the listed lifestyle elements, especially given that, in terms of bed units, the Jumbo Glacier resort, at full build-out, would be of comparable size, while the Panorama resort is much closer to Invermere. (EAO)
#133	<i>Definition of study area</i> – project committee needs to consider a much larger geographical area in studying environmental impacts of resort, covering entire greater Purcell ecosystem.	See above, responses to submissions #66 (<i>Wildlife study zone</i>) and #94 (<i>Definition of study area</i>). (MELP)
#133	<i>Impacts on Conservancy</i> - PWC will be impacted.	See above, response to submission #121 (<i>Conservancy</i>). (MELP)
#135	<i>Various wildlife issues</i> - Project contravenes Rio '92 Conference declarations, and is ill-advised and ill-conceived. When wildlife habitat is destroyed, wildlife does not relocate, numbers decline. This proposal cuts the heart out of a huge area. How many bears would be affected? Grizzlies and people are not compatible. The corridor connecting the north and south Purcells is vital.	See responses to grizzly bear issue (<i>Grizzly bears</i>) under submission #64, and to study area issue (<i>Wildlife study zone</i>) under submission #66, above. The project committee agrees that the issue of wildlife migration needs further consideration, and this is provided for in section D.3(B) of the specifications. (MELP)

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#136	<i>Studies performed by proponents</i> - Given scale of project and potential for environmental degradation, it should not be proponent who undertakes necessary environmental studies. Impartial, capable, knowledgeable persons with no financial connection with the proposed project should undertake such studies. All studies should be conducted prior to approval.	See response to this issue (<i>Responsibilities for studies</i>) under submission #124, above. (EAO)
#136	<i>European examples</i> – Cites studies from the Swiss Forest Service, Bavarian Minister for Development and Environment, Swiss Documentation Centre for Wildlife Research, Ministry of Forests, hunting inspectors, wildlife biologists, game wardens, etc. Such studies document negative impacts on wildlife from use of helicopters, motorised vehicles, and presence of skiers, damage to fragile alpine vegetation, increased burden of food demand, damage to soils from compaction, increased hazards of avalanches, difficulties involved in controlling problems once they are identified, dangers to skiers, noise impacts, questionable economic benefits. Cites examples from the International Commission for the Protection of the Alps in 1987.	See above, response to submission #86 (<i>Glacier skiing resorts in Europe</i>). (MELP)
#137	<i>Fossil fuels</i> - Concerns regarding the burning of fossil fuel for jets, running the resort operation and related road transportation.	A few public submissions raised concerns regarding the burning of fossil fuels (greenhouse gas emissions), and the potential effects of global warming on glaciers. However, assessment of the impact of long-term climate change is an area of much uncertainty. It is not clear how the information would be evaluated, or that the project would create any incremental contribution to greenhouse gases, since its customers would likely travel to other resorts if this one is not developed. While MELP requires proponents of projects that could contribute significant volumes of greenhouse gases to the atmosphere to propose strategies to mitigate greenhouse gas emissions, MELP has not been requiring project proponents to predict the impact of climate change on their own projects, because of the level of uncertainty involved. (MELP)
#137	<i>Wildlife</i> - The fragile high-mountain ecology will be disrupted and degraded. Need a complete ecological assessment, including detailed baseline inventories. Is a known bear breeding ground and migration route. Project would degrade habitat for significant numbers of	These issues are addressed extensively in the project report specifications – see sections D.3(B), (D), (E) and (H). See also response to submission #64 (<i>Grizzly bears</i>), above. (MELP)

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#138	<i>Contingency plans for mishaps</i> – Proponent should prepare written contingency plans in case of spillage.	If <i>CEAA</i> is triggered, evaluation of the environmental effects of accidents and malfunctions is required under that Act as part of the EA process (see section H.3 in both <i>Volume 1</i> and <i>Appendix A</i> of the specifications). MELP has raised similar issues in the specifications for special wastes and fuel storage – see section D.1(C) in <i>Volume 1</i> and <i>Appendix A</i> . (DFO/MELP)
#140	<i>Study area</i> – Should expand study area to include greater Purcell ecosystem, including the Glacier and Tenise Creek drainages	See above, responses to submissions #66 (<i>Wildlife study zone</i>) and #94 (<i>Definition of study area</i>). (MELP)
#140	<i>Fish and wildlife</i> - Should study impact on fish spawning in Purcell Mountain creeks, and reference Banff National Park history and current concern about development.	Section D.3(A) of the specifications addresses fish-related issues. Various specifications require research on experience elsewhere as part of the proponent's analysis of impact concerns – for example, with respect to wildlife, grizzly bears and outdoor recreational activity. (MELP)
#140	<i>Backcountry tourism</i> - Should assess decline in existing and future projects for lower-impact backcountry eco-tourism in both the Jumbo/Earl Grey Passes and PWC.	The project report specifications address the effects of the project on existing and currently proposed recreational activities, and on the resources which support those activities. Speculation on hypothetical future recreational activities and trends is beyond the scope of this assessment. (MSBTC)
#140	<i>Employee training</i> - Asked that there be requests for additional tourism/recreation post-secondary training programs to equip the resort with the necessary skilled employees for its operations.	Under current government policy, there is no expectation that a proponent must sponsor training programs, when it proceeds with a development. Various training programs have been developed in the hospitality and tourism sector by a variety of interests, and some of these are mentioned in the background to section E.3 of the specifications (see <i>Appendix A</i>). The proponent may wish to take advantage of some of these training plans, rather than developing new programs. In section E.3, the proponent is invited to indicate whether or not, at this point in project planning, it has any plans to sponsor or implement any such programs. (MEI/MAETT)
#140	<i>Scope of review</i> - Does not understand the limitations on the scope of the review.	The general principles governing the process of establishing the scope of the review are summarised in section 6.2 of <i>Appendix B</i> to the finalised specifications. In addition, in <i>Appendix A</i> of the December 13, 1996 draft specifications, the project committee clarified its position on the scope of the EA review in respect of many individual issues. <i>Appendix A</i> to the finalised specifications provides further explanation on with respect to a range of issues. (EAO)
#141	<i>Definition of study area</i> - Is concerned about potential cumulative negative effects on wildlife over a wide geographic area. Given wide-ranging species, need to expand study area. Project's close proximity to the PWC, and the potential effects on downstream surface	See above, responses to submissions #66 (<i>Wildlife study zone</i>) and #94 (<i>Definition of study area</i>). Cumulative effects on grizzly bears are a specific focus of section D.3(C) of the specifications. In addition, if <i>CEAA</i> is triggered for this project, the federal government will expect cumulative effects assessments for potentially affected fish and wildlife values. (MELP/DFO)

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<i>(Cont'd from previous page)</i>	water quality makes it essential to expand the 'zone of impact' study area to include the entire greater Purcell ecosystem.	
#144	<i>Scoping of assessment</i> - Concerned that the specifications have the potential to go beyond reasonable limits, and that tourism development will be discouraged if process goes well beyond judging a project on its merits. The approval of a project is not a forum to address environmental and philosophical concerns that occur across our society. Suspect that some opponents will oppose the project no matter how strenuous the report requirements are, and no matter how beneficial the project might be. Hope that the EA process does not serve a narrowly focused coalition of anti-development groups.	The project committee has focused considerable attention on the scope of the issues under review since releasing, and receiving comments on, the December 13, 1996 draft specifications. It has also provided the proponent with adequate opportunities to pursue its concerns that some draft specifications reflect either a lack of awareness of, or inadequate weight being given to, data already filed in earlier proponent submissions. After weighing all of the representations received on the draft specifications, the project committee has produced a summary rating of the identified issues. This rating system clarifies which issues require further review under the EA process, and which issues can be deferred to the post-certification stage. These ratings are being published as part of a package of documentation (which also includes this response chart) prepared by the project committee to accompany the release of the finalised specifications. (EAO)
#145	<i>Overview issues</i> - Feels that specification requirements for environmental assessments are neither comprehensive nor specific enough, and are unlikely to identify all of the impacts. Proponent must eliminate, not merely minimise, environmental impacts. Specifications must be far more specific in defining such things as levels of acceptable impacts. Must have accurate, thorough and completely unbiased data about such matters as fish and wildlife populations, plant communities, and impacts on water and other resources. Proponent must be required to initiate new research based on credible data. Studies could take years to generate reliable data. Must not allow any aspects of the project to proceed until all studies have been completed to an acceptable level. Project must be forced to strive for an absolute minimum of environmental impact, regardless of the cost to the developers.	The project committee has spent much time in refining and clarifying the specifications since receiving comments on the December 13, 1996 draft. The finalised specifications are now deemed by the project committee and the lead agency(ies) for each issue to be specific enough to ensure that an adequate level of assessment will be conducted. The specifications stipulate where new data collection is required, and where assessments can rely in existing information. Respecting the standards to be attained in managing impacts, under government laws and policies, these are relatively well articulated for some issues (e.g. sewage disposal or water supply), less so for others (e.g. wildlife impacts, for which each individual situation must be evaluated on the facts of the situation). Respecting impact management, the proponent is expected to explain what measures are available to mitigate potential negative impacts, and, where possible, to minimise them or avoid them entirely. However, it may well be that certain types of impact cannot be completely eliminated if the project proceeds. The purpose of the project report is to establish the extent to which identified adverse effects can be managed. Once that has been established, the project committee will provide recommendations to ministers, documenting the status of the identified issues, and noting any effects which cannot be acceptably minimised or otherwise managed in the view of the project committee. It will be the task of the ministers to decide whether or not the project should proceed, taking into account its positive and negative effects – see also section 6.6 of <i>Appendix B</i> to the finalised specifications. All of the assessments deemed necessary by the project committee must be completed before the committee will refer the project to ministers for a certification decision. At the same time, no part of the project can commence construction until the EA review is completed and unless ministers have decided to approve the project. (EAO)

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#150	<i>Definition of study area</i> - Project would threaten Conservancy. Should include PWC in surrounding area where impacts could be felt.	See above, responses to submissions #66 (<i>Wildlife study zone</i>) and #94 (<i>Definition of study area</i>). (MELP)
#150	<i>Grizzly bear studies</i> - Specifications do not indicate that a complete long-term grizzly bear study has to be done.	See above, response to submission #64 (<i>Grizzly bears</i>). (MELP)
#155	<i>Public hearings</i> – urges full public hearings.	It will be a decision of for ministers to make at the end of the project report review stage whether or not a public hearing within the meaning of the <i>EA Act</i> is held on this project – see section 6.5 of <i>Appendix B</i> to the finalised specifications for more details. (EAO)
#155	<i>Federal EA</i> – requests federal review of cumulative effects on wildlife such as grizzly bears and Bull trout.	Will occur if <i>CEAA</i> is triggered - see also response to submission #92 (<i>Cumulative effects</i>), above. (DFO)
#160	<i>Referendum</i> – referendum is needed to ensure voice of local people is heard.	The EA process is not a referendum process, but an issue-driven policy and technical evaluation of a project. The public is afforded various opportunities to comment on project proposals under the <i>EA Act</i> , and to identify issues which should be the subject of examination. The project committee must weigh the merits of the concerns being raised, deciding which issues require further assessment through the EA process. In doing this, it may conclude that some issues are known to be manageable without further assessment, or are beyond the scope of the EA process. The committee’s prime task is to evaluate the issues identified during the course of the review, and to advise ministers of the extent to which the committee considers them resolvable. The committee will also report on public opinion with respect to the project in general, and specific issues in particular, and it is possible that public views may vary significantly from the purely technical assessment of those issues by the committee. It will be up to ministers to weigh any such discrepancies. (EAO)
#160	<i>Conflict of interest</i> - Many stand to gain financially from this project, and would be in conflict of interest if involved in actual decision making.	The certification decision for the project will be made jointly by the Minister of Environment, Lands and Parks and the Minister of Employment and Investment, who are constrained by government conflict of interest rules from gaining financially from the project. (EAO)
#162	<i>Impact of public opinion</i> – Many concerns were expressed in the initial round of public meetings in September 1995 (e.g. project will have a negative effect on wildlife and fish; need for more information about the proponent; and cost to taxpayers). Is concerned that EAO's public input process is flawed, since strong opposition to the project has been documented and wonders if public opinion counts for anything.	The project committee has already responded to this point – see item 1a) in <i>Appendix A</i> to the draft specifications. The amount of focus placed by the project committee on evaluating public comments on the project clearly demonstrates the commitment with which it is considering public input. (EAO)
#162	<i>Process delays</i> - Before any further action is taken on application, wants to know context for rumours that the EA process has been delayed because of threats of lawsuits.	The process has not been delayed by threats of lawsuits from any quarter. Review progress has taken longer than provided for in the <i>Time Limits Regulation</i> for four reasons: 1. The review is unusual in the volume of public submissions received on the project, which is greater than for other projects currently subject to the EA process. It has been necessary to evaluate and respond to the numerous comments, and this has been a significant task, although not, in itself, a primary source of delay.

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Submission # From Chart	Issue(s) for Follow-up (per July 4, 1997 Chart)	Project Committee/Review Agency Response(s)
<i>(Cont'd from previous page)</i>		2. It has been necessary to clarify public policy expectations with respect to both grizzly bear impact assessments and, to a lesser extent, ski resort public highway access requirements. This task consumed most of 1996, and represents the most significant individual source of review delay to date. 3. There was an approximately 4-month delay in finalizing the PAC's report to the project committee on the draft specifications, due to an unforeseeable technical failure of the audio equipment used to record the proceedings of its final sessions. 4. The proponent requested additional time to review both the draft specifications and the public and PAC comments on those specifications. (EAO)
#163	<i>Grizzly bear studies</i> - Notion in specifications regarding prevention and mitigation of adverse effects contradicts the provincial grizzly bear strategy.	See above, response to submission #145 (<i>Overview issues</i>), which indicates that the project committee is seeking to establish the extent of potential impacts, both positive and negative, if the project proceeds, assuming that impact management measures are in effect. The project committee is aware that the provincial grizzly strategy is pessimistic about the ultimate success of measures to manage impacts on grizzly bears. The project committee has made no assumption that grizzly bear impacts can be eliminated. The specifications inquire about the proponent's impact mitigation options, and their potential for success. (MELP)
#168	<i>Mountaineering</i> - Alpine Club of Canada has had strong involvement in the area for 25 years. Mountaineering interest in the area is strong. Should poll the club. Can presently ski in area and this has less impact upon wildlife.	The project committee believes that the specifications adequately address this issue by requiring the proponent to evaluate existing recreation and tourism activity in the area (see section E.5). The Alpine Club of Canada (ACC) and other interested recreational groups can facilitate this work by documenting historic use of the area. The ACC has written to the EAO, offering to provide information on the history of mountaineering in the area, and is understood to be proceeding with this. In the meantime, MoF crudely estimates that the area may currently support between 100 and 200 mountaineer user days per year. (MSBTC/MoF/EAO)
#170	<i>Special Management Zones and grizzly bears (UNBC paper)</i> – Submission was a paper entitled: <i>Defining special management zones in land use policy: Implications for the future of sensitive resources in BC with special reference to the Grizzly Bear.</i>	The paper addresses the treatment of grizzly bear issues in land use planning. While of interest, it should be recognised that a regional land use planning process has now been completed in the area. Objectives for the management of grizzly bears in the Kootenay Region are set out in the <i>KBLUP-IS</i> (June 1997) – see section 3.4 – <i>Grizzly Bear Management Guidelines</i> . Specific objectives for the Jumbo-Upper Horsethief SRMZ are included in <i>Appendix 5</i> (see RMZ I-S07), and for the Upper Glacier Creek SRMZ, in <i>Appendix 6</i> (see RMZ K-S09). (MELP)
#186	<i>Fisheries</i> – Drainage has Westslope Cutthroat trout population and habitat for Bull trout, which is blue-listed. Both support recreation. Project will cause fishery losses.	The intent of the specifications is to ascertain the potential for fishery losses (see <i>Volume 1</i> and <i>Appendix A</i> , sections D.3(A) and H.1). The project committee will reach conclusions on any potential fisheries losses, following review of the proponent's project report. (MELP/DFO)
#202	<i>Grizzly bears</i> - Will a comprehensive and independent grizzly bear study be completed before decision is made?	See above, responses to submissions #64 (<i>Grizzly bears</i>) and #80 (<i>Grizzly bears</i>). (MELP)
#202	<i>Taxpayer costs</i> - Will there be a complete and unbiased report on costs to taxpayer?	See response to submission #92 (<i>Costs to taxpayers</i>), above. The accuracy or reasonableness of the assessments provided in the project report will be reviewed and assessed by the project committee. (MEI)

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#202	<i>Bond</i> - Will the developer be required to post a financial bond to guarantee that costs will not be passed on to taxpayers?	Given that beforehand market evaluations may or may not reveal financial risk if the project proceeds, the project committee also notes that MELP (BC Environment and Lands) has the capacity to require the posting of performance bonds as a condition of the issuance of <i>Land Act</i> tenures such as leases or licenses. Performance bonds are intended to guard against unanticipated project shutdowns (e.g. associated with financial problems). Such bonds may be applied to the costs incurred either to complete the construction of facilities, or to remove facilities and rehabilitate the disturbed land. (MELP)
#204	<i>Full cost accounting</i> – Need full cost accounting approach to evaluation.	See response to submission #46 (<i>Economic assessments</i>), above. (MEI)
#205	<i>Review deadline</i> - Requests that deadline for public comment period be extended to mid-March.	See response to submission #40 (<i>Time for review</i>), above. (EAO)
#205	<i>Continuing review</i> - Has a number of detailed concerns, including continued review of this project despite public opposition.	The <i>EA Act</i> requires the review of a project to continue until the assessments are completed. In this case, the project committee has decided that a second stage of review is necessary to put the committee in a position to advise ministers with confidence on all aspects of the project. (EAO)
#205	<i>Wildlife</i> – Concerns include lack of three-year grizzly bear study, specifications which focus on mitigation, minimising, restoration and contingency plans, which are all devices intended to legitimise destructiveness of this project, impacts on wildlife corridor, impacts on grizzly bears.	See above, responses to submissions #64 (<i>Grizzly bears</i>) and #145 (<i>Overview issues</i>). (MELP/EAO)
#211	<i>Limits on impacts</i> - No definition in specifications of level of acceptable environmental impact (e.g. by citing standards such as: if habitat of more than 25 grizzly bears is impacted, project cannot go forward).	Under government laws and policies, expectations to be met by developers are relatively well articulated for some issues (e.g. sewage disposal or water supply, for which many expectations are set by regulation), but less so for others (e.g. wildlife impacts). To the extent that such objectives exist, they will form the context for the review of the project by the lead agency(ies) for each issue. For wildlife impacts, impact management goals, whether quantitatively or qualitatively defined, tend to be developed by government's wildlife specialists on a case-by-case basis, using their professional judgement to evaluate projects in the context of the specific characteristics of the potentially affected environment. In any event, working level staff do not normally determine that a certain level of impact is or is not acceptable, unless it violates a legal enactment. Rather, their role is to establish the extent of impact and the degree to which that level of impact is consistent with government legal and policy expectations. Having received the project committee's analysis of impact issues raised by the project, and its recommendations, ministers will decide, taking into account the positive and negative effects of the project, whether or not the project should be certified under the <i>EA Act</i> . (EAO)
#211	<i>Conservancy</i> - Environmental impact of resort on Jumbo Creek drainage will be catastrophic, and on the PWC and the Glacier Creek drainage, major. Concerned about responses on pp. A-14 to A-18 of the draft specifications, concerning land use. Wants	The <i>KBLUP-IS</i> (June 1997) indicates that ski resort development is a potentially acceptable use in the Jumbo-Upper Horsethief SRMZ, providing that a resort can be developed in a manner which is compatible with the newly-established planning objectives in and around the area, including those for sensitive values identified in the area. This would include management objectives for the PWC. (MELP)

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<i>(Cont'd from previous page)</i>	definition of what would be a compatible use near the PWC.	
#211	<i>Climbing interests</i> - Cannot find where, in the draft specifications, the concerns of climbers who use Farnham Creek headwaters are addressed, nor where the protests of hikers, climbers and family campers have been answered.	Many comments have been received on this project from climbers, hikers and campers. The project committee is satisfied that these concerns are being adequately investigated through the reporting requirements set in section E.5 of the project report specifications, notably in sections E.5(A) – <i>On-site and Adjacent Outdoor Recreational Use</i> – and E.5(C) – <i>Visual Impacts of Development</i> . (MSBTC/MoF)
#212	<i>Performance bond</i> – Should have to be posted by proponent.	See above, response to submission #202 (<i>Bond</i>). (MELP)
#212	<i>Decommissioning</i> – Specifications should require decommissioning plans for the resort.	A resort is not like a mine, which has a finite life. Once the mineral resource is extracted, the mine must be decommissioned. A resort, if developed, is expected to be in place on a long-term basis. A full decommissioning plan is therefore not considered a necessary part of the initial design of such a proposal. Having said that, a significant focus is being placed on project feasibility, in order to ensure, before the project is constructed, that it can be demonstrated to be viable in both the short term and the long term. For further discussion, see the explanation under the heading <i>A Note on Permanent Project Closure and Decommissioning</i> in <i>Appendix A</i> , section A.1 of the finalised specifications. It should be noted that performance bonding is required under the CASP process for each development stage to secure against public liability. The CASP master development agreement also defines provisions for ongoing operation of ski areas in the event of financial failure. (MELP)
#228	<i>Full cost accounting</i> – Advocates full cost accounting of such expenses as search and rescue, ambulance, road maintenance, avalanche control, landfill facilities, fire service.	See response to submission #46 (<i>Economic assessments</i>), above. (MEI)
#228	<i>Grizzly bear studies</i> – advocates 3-year study of grizzly bears.	See above, response to submission #64 (<i>Grizzly bears</i>). (MELP)
#231	<i>Policy context</i> - Does the project promote justice? Will the project promote or restore reciprocity? Does the project confer divisible or indivisible benefits? Does the project favour people over machines? Does the planning strategy maximise gain or minimise disaster? Does the project favour conservation or waste? Does the project favour the reversible over the irreversible?	The project committee is couching its questions about the project in terms of existing government policies and expectations for such development. While some of the questions posed here may be reflected, to a more or less implicit or explicit extent, in the existing frame of reference for the evaluation, the responsible government agencies also incorporate a wide range of other factors in establishing their expectations. If the writer believes that these questions should explicitly form a basic frame of reference within which other review questions are posed, then the writer should consider pursuing this point of view directly with relevant government ministries involved in project reviews of this type. (EAO)
#232	<i>Ecological economic costing</i> – no mention of this approach to project evaluation in specifications.	See response to submission #46 (<i>Economic assessments</i>), above. (MEI)

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Submission # From Chart	Issue(s) for Follow-up (per July 4, 1997 Chart)	Project Committee/Review Agency Response(s)
#234	<i>Automobile emissions</i> - Draft specifications should address cumulative long-term impact of automobile emissions.	See above, response to submission #137 (<i>Fossil fuels</i>). (MELP)
#237	<i>Federal EA review jurisdiction</i> - Federal assessment should be done on impact on Purcell Mountain ecosystems.	The federal EA process (<i>CEAA</i>) is applicable to a proposed development if a federal authority (e.g. DFO, DOE or Parks Canada) undertakes any one of four specific 'actions', commonly referred to as 'triggers'. <i>CEAA</i> applies if a federal authority: (1) proposes or initiates a project; (2) provides funding; (3) provides federal land; or (4) issues a permit, licence, authorisation or other approval to allow the project to proceed, and the approval is included in the <i>Law List Regulation</i> . An exception would occur if the development in question either was not a 'project' within the meaning of <i>CEAA</i> or was listed in the <i>Exclusion List Regulation</i> – neither condition applies in this case. The conditions under which the federal EA process may apply were clearly described in the draft specifications, and are again described in the finalised specifications – see <i>Volume 2 (Appendix A, section H, and Appendix B, sections 3.2 and 4.2)</i> . The applicability of <i>CEAA</i> is automatic if any of the triggers exist, and does not depend on an invitation from the province. Based on the information provided by the proponent to date, DFO has not been able to ascertain if a <i>CEAA</i> trigger exists for the Jumbo Glacier project. Should <i>CEAA</i> be triggered, the geographic scope of the assessments within the Purcell Mountains would then have to be determined. The direct effects would be addressed through studies of the project site itself, but indirect and cumulative environmental effects must also be considered. The <i>CEAA</i> legislation requires that "...any cumulative environmental effects likely to result from the project in combination with existing or planned projects or activities..." must be examined. The geographic range of the cumulative effects analyses would vary from species to species, since the range of potentially affected populations may be quite different (e.g. downstream fisheries vs. migratory birds). (DFO)
#241	<i>Grizzly bear studies</i> – Why was grizzly bear study cancelled?	See above, response to submission #64 (<i>Grizzly bears</i>). (MELP)
#242	<i>Public awareness of review</i> - Is concerned that the project and review process has been so poorly advertised because many have not heard of it. Locals deserve to hear more about this project, since they will be the most affected.	Disagree. The large volume of public submissions received on the project is testimony to the widespread awareness of the project review among local residents. For further details on the provision made for public notification, access to information and consultation in the review process to date, see sections 5.4 and 5.5 of <i>Appendix B</i> to the finalised specifications. (EAO)
#242	<i>Decommissioning</i> - How would resort be decommissioned if it fails?	See above, responses to submissions #202 (<i>Bond</i>) and #212 (<i>Decommissioning</i>). (MELP)
#243	<i>Greenhouse gasses</i> - Concerned about increased greenhouse gas emissions.	See above, response to submission #137 (<i>Fossil fuels</i>). (MELP)
#247	<i>Public hearing</i> – Public hearing is required on this project.	See above, response to submission #155 (<i>Public hearings</i>). (EAO)

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Submission # From Chart	Issue(s) for Follow-up (per July 4, 1997 Chart)	Project Committee/Review Agency Response(s)
#248	<i>Grizzly bears</i> - Grizzly bears are on decline. Jumbo Creek is 6 th on 'Prioritised Hot Spots List' for bear populations in trouble in BC. Project committee proposes no wildlife studies. A 2-to-3-year grizzly study, addressing grizzly bear populations for entire Purcell Mountain ecosystem, was omitted as a specification. For province to be viewed as a leader in grizzly bear conservation in North America, this project should not be approved. Grizzly bears in Kootenay Region are listed as vulnerable (at risk). Jumbo Creek valley provides excellent habitat, and is major travel corridor for bears between PWC and White Grizzly Wilderness. The project would eliminate large portion of existing bear habitat and reduce grizzly populations.	It is not clear which 'hot spots list' for grizzly bears is being referred to. The 1995 BC <i>Grizzly Bear Conservation Strategy</i> does not itemise specific areas of concern for grizzlies in BC in this manner. Grizzly bears are a blue-listed species throughout the province. The Kootenay region is an inherently productive area for grizzly bears. The Purcell Mountains support a 'peninsular' population of grizzly bears in that there are linkage problems (fracture) across Highways #95/Columbia River, Highway #1, Kootenay Lake, and to a lesser degree, Highway #13. Within the Purcells, there are relatively few roads fragmenting the region, and relatively few human/bear conflicts. The Rocky Mountain Grizzly Bear Planning Committee, which includes members from BC, Alberta, Montana, and the US Fish and Wildlife Service, are focused on linkage issues and genetic diversity in area populations. See also above, response to submission #64 (<i>Grizzly bears</i>). (MELP)
#259	<i>Housing</i> – Concerned that resort staff will place burden on accommodation supply in Columbia valley.	The project committee agrees that this issue needs further attention – see section E.9 of the finalised specifications for more information. (MMA)
#259	<i>Sewage</i> – Concerned about how sewage will be disposed of.	See above, response to submission #125 (<i>Sewage</i>). (MELP)
#268	<i>Water/waste</i> – Concerns re. waste collection and disposal, sewage treatment, groundwater and surface water quality in Jumbo Creek.	Regarding solid waste issues, see above, response to submission #88 (<i>Solid waste</i>), and also section D.1(A) of the specifications. Regarding sewage disposal, see above, response to submission #125 (<i>Sewage</i>), and also section D.1(B) of the specifications. Regarding water sources and water quality issues, see sections D.1(D) and D.2(A) of the specifications. (MELP/RDEK)
#268	<i>Access road</i> - Concerns re. road access and avalanche hazard.	Project committee agrees that, while some issues have been addressed to the project committee's satisfaction, others require further attention - see sections C.3 and E.6(C) and (D) of <i>Volume 1</i> and <i>Appendix A</i> . (MoTH)
#268	<i>Wildlife</i> – Concerns for wildlife impacts.	The potential wildlife impacts of this project are addressed extensively in section D.3 of the specifications. (MELP)
#268	<i>Socio-economic</i> – Concerns for impacts on local economy.	The project committee is satisfied that the information already provided by the proponent, plus additional reporting on economic impacts required in various subsections of section E of the specifications, will ensure an adequate understanding of the impacts of the project on the local economy. (MEI/MSBTC)
#269	<i>Guide/outfitter</i> - If project proceeds, the integrity of the guiding territory in the Toby and Jumbo drainages will be severely impacted. Specifications indicate that the proponent must deal with Mr. Barsby, who requests third-party intervention. Outfitting is his full time occupation. He would suffer loss of his grazing rights, and the project would drive away summer/fall business.	The project committee recognises the concern stated here. Specifications D.3(B)#9 and D.3(C)#3 require the proponent to consult with long-time users of the Jumbo Creek valley and adjoining valleys, so that assessments of wildlife populations, habitats, etc. benefit from the local knowledge of those familiar with the area. It should also be noted that specification E.5(F)#11 has been amended. The proponent is still expected to try to conduct discussions with the guide/outfitter and traplines holders, but, if this is not possible, the proponent is expected to produce an assessment which uses available information. The specification also reserves for the project committee the option to commission an independent assessment of issues, if required. (MELP)

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<i>(Cont'd from previous page)</i>	He has a license to build a cabin and corral in Jumbo and Leo Creeks, but the proposal has put project on hold. Suggests government ask some local old-timers about the valleys. Valley has great habitat for white-tailed and mule deer, elk, moose, goats, and grizzly and black bear.	
#274	<i>Sustainable development</i> – Questions definition of sustainable development in specifications.	The project committee's view of sustainability issues was documented in its response to item 3a) in <i>Appendix A</i> to the draft specifications (see pages A-20 to A-22). (MELP)
#274	<i>Wildlife (various)</i> - Raises questions regarding applicability of cumulative effects model, mortality sub-model, and further study of disturbance- and mortality-related effects of dispersed human activities on grizzlies, as well as definition of acceptable levels of risk and grizzly bear population thresholds. Proponent should study effects on all federally- and provincially-listed species of concern.	The project committee has decided not to change its earlier decision to require application of the cumulative effects model in assessing grizzly bear impacts, but has modified the draft specifications to provide for the design and application of the cumulative effects assessment model to be reviewed by a panel of grizzly bear experts (specification D.3(C)#10). See also response to submission #64 (<i>Grizzly bears</i>), above. Assessments of 'listed' species other than grizzly bears are addressed in sections D.3(D) and (E) of the specifications. (MELP)
#274	<i>Glacier impacts</i> – Should assess physical, chemical and hydrological modifications of glacier surface, and establish baseline data for Lake of the Hanging Glacier and Horsethief Creek.	Conventional glacier grooming techniques are proposed, rather than more significant glacier modification. The significance of this issue is addressed in section C.2 of the specifications, while the quality of local water bodies is addressed in sections D.1(B) and (D). (MELP)
#274	<i>Socio-economic</i> – Need more consideration of proposed Panorama expansion - cumulative pollution effects, impact on market demand, and cumulative demand for labour between two resorts.	With respect to the impact on labour, the reporting requirements in sections E.2 and E.3 of the specifications require the proponent to estimate the proportion and types of direct employment expected to be filled by local and regional residents. Based on this assessment and the profile of the current local labour force (which is required under section E.1), the project committee will be able to identify whether cumulative labour supply impacts could pose a problem. The impacts of the Jumbo Glacier development on other ski resorts in the region (including the Panorama resort) will be addressed in an independent feasibility assessment of the project which is to be commissioned by the project committee – see section B.4 of the specifications. The cumulative environmental effects of the Jumbo Glacier resort are being addressed on a selective basis, where there is perceived to be a need (e.g. with respect to grizzly bear impacts – see section D.3(C) of the specifications). A broader assessment of cumulative environmental effects will also be required if CEAA review is triggered for this project – see section H.2 of the specifications. (MEI/MELP)
#274	<i>Time for review</i> - Concerns re: time allotted for public review of specifications.	See response to submission #40 (<i>Time for review</i>). (EAO)

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#278	<i>EAO staffing</i> – How many EAO staff are working on the project review?	In order for EAO to administer the review of any project, six EAO staff will normally devote a certain percentage of their time to the review. Most EAO staff are involved in several project reviews simultaneously. Assigned EAO staff include the project committee chair, a project assessment co-ordinator, a First Nations relations coordinator, an administrative support person, and EAO's Project Registrar and her assistant. (EAO)
#278	<i>Further consultation</i> – Ministers should attend public meetings.	This suggestion should be addressed directly to the ministers in question. (EAO)
#278	<i>Tendering process</i> – what was tendering process for resort?	For brief explanation, see <i>Volume 2</i> of the finalised specifications, <i>Appendix B</i> , section 2. (MELP)
#278	<i>Project viability</i> - How will a development as small as Phase 1 attract visitors from Japan and Europe? What are the consequences (e.g. costs to taxpayers) of failure after completion of Phase 1 and need to decommission?	Project feasibility and market demand are to be the subject of an independent assessment commissioned by the project committee – see section B.4 of the specifications. Feasibility assessments will continue at a more detailed level if the project is approved at the conclusion of the EA process, and proceeds into the ski area master planning stage under the CASP process. At that stage, the province and the proponent would conclude a master development agreement, which would stipulate the proponent's obligatory scheduling requirements for resort development. At that time, MELP can impose performance bonding under the <i>Land Act</i> to secure the province against any risk of financial failure, should the resort encounter financial difficulties once operations are underway. (MEI/MELP)
#278	<i>Snowfall</i> - Need firm data on snowfall and winter and summer weather to determine viability.	Information on snowfall, snow conditions, aspect, etc., was provided in the proponent's application, and will be considered as part of the independent feasibility analysis which is to be commissioned by the project committee – see section B.4 of the finalised specifications. (MELP)
#278	<i>Avalanche threat to utilities</i> - The effects of avalanches on electrical/telephone transmission have not been considered.	The transmission systems for the resort will follow the road access corridor, with respect to which extensive attention has been given to avalanche hazard – see section E.6(D) of the specifications. (project committee).
#281	<i>Cumulative effects</i> – federal EA should be conducted to obtain regional overview, also cumulative effects study to address use of fertiliser and salt, glacier ablation, and downstream water quality.	The specifications provide for further assessments of impacts on downstream water quality – see sections D.1(B), D.1(D), D.2(A) and D.3(A). The proponent has provided assurances that neither salt nor fertiliser will be used for ski run maintenance during normal resort operations, so the project committee has deleted any reporting requirements with respect to their use. The project committee has concluded that there is no special concern with respect to glacier ablation over any meaningful timeframe, given the high elevation of the proposed glacier ski terrain. Thus, any specifications with respect to that issue have been deleted. If CEAA is triggered, federal requirements will include a cumulative effects assessment – see section H.2 of the specifications. (DFO/MELP)
#281	<i>Ecological/economic costs</i> - An ecological/economic total cost assessment needs to be prepared.	See response to submission #46 (<i>Economic assessments</i>), above. (MEI)
#281	<i>User survey</i> - Should conduct a public survey of those who use the PWC, Jumbo Pass and Lake of the Hanging Glacier areas.	Members of the public who use this area have already expressed their concerns over the project's potential impacts on recreational settings adjacent to the project site. The project committee is satisfied that the specifications address these issues adequately (see section E.5), and does not believe that a user survey would add materially to its grasp of these concerns. (MSBTC/MoF)

Jumbo Glacier Alpine Resort Project - Project Committee/Review Agency Responses to Comments Received on the December 13, 1996 Draft Project Report Specifications

Submission # From Chart	Issue(s) for Follow-up (per July 4, 1997 Chart)	Project Committee/Review Agency Response(s)
#284	<i>Tourism studies</i> - Economic development is more beneficially achieved through smaller-scale, locally owned/operated tourist facilities. The writer cited studies conducted in 1992-1994 and 1995 (Kootenay Lake CoDesign Process and Tourism Action Society) which, in the writer's view, proved that there is a large demand for small-scale, 4-season, low-impact, locally-owned tourism. Project does not accommodate growing desire for eco-tourism, and instead discourages it.	The project committee recognises that land allocated to ski resort development would not accommodate certain other forms of eco-tourism, and the specifications require an assessment of the impacts of the project on such activities in and around the project site (see section E.5). However, it is not clear what role the proposed resort would play as a base for other eco-tourism products. The proponent's project report, and the independent feasibility assessment provided for in section B.4 of the specifications, should help to clarify this issue. However, the project committee does not consider it either realistic or warranted for the proponent to attempt to predict the broad future directions of the eco-tourism sector, which is considered beyond the scope of this review. MEI points out that international tourism travel to BC is growing, and activities such those which would be offered at the proposed resort are a key component of this increasing travel demand. Small-scale commercial backcountry activities are appropriate and compatible activities in and around resorts, as well as proceeding on a stand-alone basis, as is demonstrated elsewhere in the Kootenay region. Growth of such activities attests to this. It is appreciated that the Jumbo Glacier resort project is a larger-scale project. The economic benefits of construction and larger volumes of visitor expenditures offered by this proposal are not associated with smaller projects. (MEI/MSBTC)
#285	<i>Full cost accounting</i> - As a taxpayer, is not willing to support expenses incurred by project. Wants to see full cost accounting.	See responses to submissions #46 (<i>Economic assessments</i>) and #92 (<i>Costs to taxpayers</i>), above. (MEI)
#294	<i>Global warming</i> - Discusses findings of the UK's Natural Environment Research Council on global warming and the effects of decreasing boreal forests and peat bogs. The validity of ski resorts is questionable, given the concern over global warming.	See above, response to submission #137 (<i>Fossil fuels</i>). (MELP)
#295	<i>Public advisory committee</i> - PAC members should sign affidavit that they will not receive any compensation from the proponent.	All PAC members signed an affidavit in January 1997, indicating that they had not received, and were not receiving, any such compensation from the proponent. (EAO)
#308	<i>Response to public's issues</i> – concerned about effective involvement of the public, and lack of response to public letters since October 1995.	<i>Appendix A</i> to the draft specifications represented a very in-depth response to the wide range of views and issues expressed by the public during the review of the proponent's application. The present chart represents a further significant effort to respond to public concerns. See also sections 5.4 and 5.5 of <i>Appendix B</i> to the finalised specifications. (EAO)
#317	<i>Fisheries</i> – Jumbo drainage supports Westslope Cutthroat trout, which is in decline, also blue-listed Bull trout. Water demands and snowmaking will have severe effects on winter fish habitat.	Snowmaking is not required at the proposed resort, so will not be a factor in water availability for fisheries. The intent of the specifications is to ascertain the potential for water demands to impact over-wintering habitat for fish (see <i>Volume 1</i> and <i>Appendix A</i> , sections D.3(A)). Project committee will draw conclusions following review of proponent's project report. (MELP/DFO)