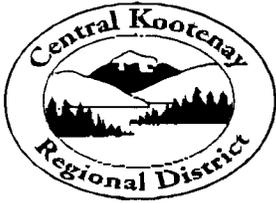


Appendix D
Local Government Response Documents



Regional District of Central Kootenay

Box 590, 202 Lakeside Drive
Nelson, BC V1L 5R4
web: www.rdck.bc.ca

Telephone (250) 352-6665 Fax (250) 352-9300
BC Toll Free 1-800-268-7325
email: rdck@rdck.bc.ca

May 5, 2004

Mr. Roger D. Tailleir
Environmental Assessment
P.O. Box 9426 Stn Prov Govt
Victoria, BC V8W 9V1

BYFAX: 250-387-6448

Dear Mr. Tailleir:

Please be advised that the following resolution was adopted by the Board at the meeting of April 24, 2004:

566/04

The memorandum dated April 20, 2004 from Director Greenlaw regarding the Jumbo Glacier Resort Project and requesting the Board convey to the Environmental Assessment Office the following points of concern / impact to the RDCK:

- The North Kootenay Lake Area is engulfed in parks and wilderness areas. As a consequence, we have suffered severe economic hardships in the forest sector and lost opportunities in the mining, commercial, recreation and tourism industries.
- Further degradation of our resource areas in Glacier Creek and Howser drainages for mitigation of grizzly habitat for the Jumbo Glacier Resort project is unacceptable.
- The North Kootenay Lake Area is depressed with limited employment. We must protect our remaining resource areas to maximize all possible economic opportunities.

be received and the foregoing be communicated to the Environmental Assessment Office for inclusion in the Public Submission Process.

Yours truly,

Carol McGowan
Deputy Chief Administrative Officer

CM:mem

Document2



Village of

RADIUM HOT SPRINGS

British Columbia, Canada

Box 340
Radium Hot Springs, B.C.
Canada V0A 1M0

Telephone (250) 347-6455
Facsimile (250) 347-9068

May 17, 2004

Martyn Glassman, Project Assessment Director
PO Box 9426 Stn Prov Govt
Victoria, B.C.
V8W 9V1

Also via fax to 250-387-2200 (2 pages)

Dear Mr. Glassman,

The Village of Radium Hot Springs appreciates the opportunity to comment on the application to the Province for the development of a ski resort in the upper Jumbo Valley. We have considered the question carefully over many years, and we continue to return to two main issues of public policy.

We believe that the first priority is to gauge the carrying capacity of the public land in question under the various existing and proposed uses. We are concerned with the protection of the natural assets of our region, out of respect for their intrinsic wild value, and in recognition of the economic value they represent as the foundation of our tourism industry. We recognize that any public use is likely to have some impact, but we also believe that some impacts are much more feasible to manage than others.

Once the type and scale of acceptable commercial use has been set within reasonable limits, we believe that the next priority should be to gauge which acceptable commercial uses of the public land return the highest value to the province, in exchange for the "load" that the back country is being asked to carry. We acknowledge that this may favour some commercial uses which compete with existing patterns of public recreation, but we also believe that, as responsible members of the public, we have to expect to make some tradeoffs in return for the demands we place on government for services. We acknowledge that this may also lead to a review of some existing commercial uses to see whether they continue to provide the greatest return to the public when compared to new options that weren't considered when the original tenures were granted.

Martyn Glasman / May 17, 2004

We are very pleased at the way in which the extensive review of the Jumbo Glacier Resort (JGR) project has addressed the question of carrying capacity. Current users have had many opportunities to provide information on the existing load on the land, and much professional expertise has been marshaled to try to quantify the effects of existing use and potential new use of the land on the natural environment. Our understanding of the conclusions of the technical review is that there is general agreement that most effects on the natural environment can be managed within reasonable limits. The exception is a disagreement on the impact to grizzly bears in the central Purcell region: that disagreement having to do fundamentally with which methods of mitigation are acceptable. (There does seem to be agreement that certain measures would be effective from a biological perspective, but that they would not be preferred by members of the public who would lose some access to areas or hunting quotas that they currently enjoy.)

That competition between human users leads us to the role of the JGR in discussions around highest return to the public from commercial tenures on crown land. Local governments in the region have expressed concern repeatedly over the scope and number of tenures being granted under the province's Back Country Commercial Tenure program. These tenures are being granted in the absence of any serious investigation of carrying capacity and for remarkably small payment to the public for the use of crown land (\$1 to \$4 per customer day.)

An existing large commercial operator contends that the intrusion of the JGR project into his tenure would fatally damage his business and that there is no opportunity for cooperation between the two operations — this commercial user pays approximately \$12,000 in annual user fees to the province for a tenure encompassing approximately 145,000 hectares. When we contrast this to JGR, whose operation on 104 hectares of developed land (within a ski area boundary of 5,900 hectares) is expected to pay \$3,200,000 in annual local and provincial government property taxes at build-out, we are puzzled why this striking difference doesn't form a larger part of the discussion around this project.

Everything doesn't come down to money, but money is what our government uses to pay such people as nurses, teachers and conservation officers. Until we in the public choose to forego many of the services we now expect from government, we need to expect our governments to look for the most responsible ways to provide those services. The very careful allotment of our ever more precious wild land, in order to

Martyn Glassman / May 17, 2004

receive the highest return to the public for the least amount of public land, strikes us as an appropriate course to follow.

For this reason, in the context of overall public policy, the Village of Radium Hot Springs supports the JGR proposal in the reduced scale of its most recent design. We do so with the firm expectation that the province will meet its critical responsibility to ensure that the technical solutions, outlined in the EA review for development in the back-country, are built into the project and operated properly for the life of the project.

As a community with an economy that is dependent in large measure on tourism, we also support the project for the boost that it will give the international profile of tourism in this region and the province as a whole. We believe that a mature tourism industry, cognizant of the need to protect the natural resources on which it depends, is a good partner for a vigilant government in ensuring the health of our environment.

Yours truly,

The Council of the Village of Radium Hot Springs



Mark Read, CAO

District of Invermere

"ON THE LAKE"

File: 6.6.8.3

Fax: 250 342-2208

Environmental Assessment Office
PO Box 9426
STN PROV GOVMT
Victoria, BC
V8W 9V1

Attention: **Martyn Glassman, Project Assessment Manager**

Dear Sir;

Re: **Proposed Jumbo Glacier Resort**

At the May 11th, 2004 Council Meeting Resolution #04/147 was passed and then ratified at the May 25th, 2004 Council Meeting.

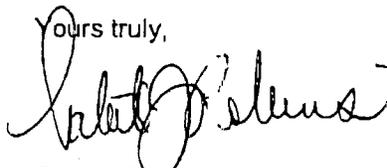
Resolution #04/147:

"WHEREAS the District of Invermere has been requested by the Provincial Government to provide comment on the Jumbo Glacier Resort proposal, and further to our submission of April 27, 2004 to the Technical Advisory Committee, the District of Invermere has actively sought input from the citizens of Invermere and has received overwhelming and widespread opposition to the proposal, based largely on negative environmental, economic and social concerns.

NOW THEREFORE BE IT RESOLVED THAT the District of Invermere opposes the Jumbo Glacier Resort proposal currently under review by the Environmental Assessment and the Provincial Government."

I have also included, for your information, Council's April 27th, 2004 submission to the Technical Advisory Committee.

Yours truly,



Patrick Robins
Chief Administrative Officer

PR/ccg

Encl. DOI Submission to TAC (April 2004)

Technical Advisory Committee,
Environmental Assessment Office
Public Input, Jumbo Glacier Resort
April 27, 2004

Dear Mr. Glassman,

As you are aware, the District of Invermere has until May 26th to complete its response to the Environmental Assessment process concerning Jumbo Glacier Resort. This time frame conflicts significantly with the request for the Technical Advisory Committee response of April 23, 2004. In an effort to assist members of the Technical Advisory Committee, the Council, in its regularly scheduled meeting held on April 27, 2004 approved the following.

The following is a highlight of many of the areas that may be contained in the District's final submission to the Environmental Assessment Office. These issues should not be construed as either support or opposition to the project, but rather as needed changes to existing services in Invermere to meet the needs of the Jumbo Glacier Resort if the Province approves the project.

Issues 1 Waste Management System: The District of Invermere will not have our Consulting Engineers study the proposed Waste Management System. We are assuming that the appropriate provincial authority is responsible for evaluating the project to ensure provincial standards will be met. However, our concerns are really in the application and maintenance of the Waste Management System once approved in principle. Discussions with colleagues in Fernie, Golden (Kicking Horse), and our own observations (Panorama) indicate that even new systems do not necessarily operate as intended. If the project is approved, then, the engineering of the waste management systems used at Jumbo Glacier must be of a highest caliber to ensure that the Jumbo creek and other related waterways are not affected by the project. In addition, appropriately trained and paid personnel have to be in place to ensure that the system is monitored and is performing to the standards as engineered.

Issues 2 Storm Drainage: The District of Invermere will not have our Consulting Engineers study the proposed Storm Sewer System. We are assuming that the appropriate provincial authority is responsible for evaluating the project to ensure provincial standards will be met. Again, as we are a downstream community, any sediment and extra run-off will have an adverse effect our surrounding environment – the Columbia Valley Wetlands. The wetlands is a world class environmental wonder, and because of that, significant economic spin-offs have been generated in Invermere – eco-tourism, Wings over the Rockies, second home owners, timeshare participants and the like. Therefore all storm water issues during construction and on completion of the project must be contained on site and not be discharged into the Toby Creek and or any other water system.

- Issue 3 Bridges. To access the Panorama/Jumbo Road, visitors must enter into Invermere from highway 93/95. In doing so, they will cross the Athelmer Bridge that spans the Columbia River at the eastern end of The District of Invermere, then they must cross the Toby Creek Bridge in the north west end of The District of Invermere. Both of these bridges are under the maintenance responsibility of the District of Invermere. The additional traffic volumes will require more regular maintenance as well as a shortening of the predicted life span of these bridges. As the proposed Jumbo Glacier Resort is outside of the municipality, the District of Invermere does not have the financial instruments under the Community Charter. Therefore, some type of long term financial mechanism must be established by government, to allow the District of Invermere to tax users accordingly (share of property tax, share of gas tax, share of property sales tax etc.) or some other type of compensation plan will be required. Otherwise it will be the residents of Invermere who will be subsidizing the Resort.
- Issue 4 Roads: To access the Panorama/Jumbo road, day skiers and visitors to Jumbo must drive through a portion of Invermere. The added traffic will require changes to the existing roadway to ensure safety and proper traffic flow. Two areas of specific concern will be the intersection at the top of the railway bridge and panorama road, where a turn right lane and a set of lights may be required. The other major concern is an ‘S’ curve in the Panorama road as it approaches Invermere’s Industrial area. The added traffic may require that the road be straightened out, as it may no longer meet the standards required for the volume of traffic predicted. Finally, the roadbed itself may be required to be upgraded, as it may not be up to the standard required for the predicted volume of traffic. Given that the roadway in question used to be part of the MoT road maintenance system, the Ministry should have the background information and expertise to calculate the costs of these changes, as well as the ability to fix the ‘S’ curve as the straightening of the road would go through the provincial road maintenance yard. Again, some type of long-term financial mechanism must be established by government, to allow the District of Invermere to tax users accordingly to pay for the up keep of the road.
- Issue 5 Hospitals: Funding for Hospital services appear to be tied to stable population figures of a community rather than the temporary population that is normally associated with resort communities. In this specific case, the catchment area would change from approximately 9,000 people to 13,000+ per day (700 Jumbo employees plus an average of 3,477 visitors a day at the resort). This “shadow” population will need emergency medical services as they are here for recreation and thus may be more accident prone than during normal day-to-day activity. As a consequence, additional emergency services in Invermere Hospital should be increased to cover these 4,177 more people. Otherwise the District of Invermere would be subsidizing the Resort through less service being made available to the community.

- Issue 6 Ambulance: Given the experience with Panorama Resort, it is a certainty that increased ambulance services will be required for the Jumbo Glacier Resort. The road distances will increase the time that ambulance attendants will be out on call. Again, staffing levels will have to be increased to meet the needs of 4,177 more people a day who will be engaging in higher risk recreation activities. Otherwise it will be the citizens of Invermere that will be subsidizing the proposed resort through reduced service to its citizens.
- Issue 7 Jaws of Life: The Invermere Volunteer Fire Department currently responds to motor vehicle accidents within a radius of 60 to 80 kms outside of our jurisdiction. Given the added volume of traffic that will be required to meet the daily objectives of Jumbo Glacier Resort, the probability of more call outs in the area is inevitable. To effectively meet these increased needs, it may be necessary to upgrade the initial response vehicles such that the appropriate rescue tools are available to meet the increased demand.
- Issue 8 Policing: The police detachment at present has 10 officers for all of the Upper Columbia Valley. This translates into approximately 1 officer per 1,000 permanent residents. The addition of 4,177 people into the area will require the addition of a minimum of 4 more officers just to simply maintain the existing level of policing in the valley. Otherwise it will be the citizens of Invermere and the Columbia Valley that will be subsidizing the proposed resort through reduced service to its citizens.

In addition to the above, the final submission may deal with other issues that Council feels relevant to the project, such as public sentiment, possible governance issues and the like.

If you have any questions or concerns on any of the above, please contact me, or Patrick Robins, CAO for the District of Invermere.

Yours truly,

Brian Mc Laughlin
Brian Mc Laughlin
Councillor for the District of Invermere

Mark, Robert, Joanne, Gerry, and Patrick Robins.

Attached is a draft letter to the Technical Advisory Committee for the Jumbo EAO project.

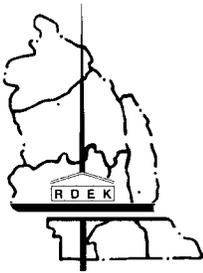
The TAC members were to provide their comments by Friday April 23, 2004. My initial understanding from the committee was that our role was not really a technical one like the other members, and so we would not really be having a response or make as a member of the technical committee.

However, I was asked by the manager of the project if we could put something in so that the committee and the proponent would have a heads up to our final submission due the 25th of May.

The following is from a brief discussion that I had with Brian N. and initial comments that I had made to the EAO.

Please read and see if you feel comfortable with this response if we decide to submit one to the technical committee.

Brian



REGIONAL DISTRICT OF EAST KOOTENAY

Main Office
19 - 24th Avenue South
CRANBROOK, BC V1C 3H8
250-489-2791 • FAX 250-489-3498

Columbia Valley Office
Box 2319, 4956 Athalmer Road
INVERMERE, BC V0A 1K0
250-342-0063 • FAX 250-342-0064

email: rdek@rdek.bc.ca • website: www.rdek.bc.ca

File: P 800 503

May 11, 2004

Martyn Glassman
Project Assessment Director
Environmental Assessment Office
2nd Floor 836 Yates Street
PO Box 9426 Stn Prov Govt
Victoria, BC V8W 9V1

Dear Mr. Glassman:

Re: Jumbo Glacier Resort Project

At its regular meeting on May 7th, the RDEK Board discussed the Jumbo Glacier Resort Project and its response to the invitation to provide comments prior to May 25, 2004.

After consideration, the Board adopted the following resolution:

"That the Environmental Assessment Office be advised the RDEK is unable to comment on the Jumbo Glacier Resort project."

The decision was made after a discussion of the requirements for a public hearing should a project certificate be issued and an application be made to amend the Upper Columbia Valley Zoning Bylaw.

If you have further questions, please contact me at 250 489-0312.

Sincerely,

R.D. Whetham, Manager
Planning & Development Services

RDW/bjm

MUNICIPALITIES

CITIES: Cranbrook, Fernie, Kimberley; DISTRICTS: Elkford, Invermere, Sparwood; VILLAGE: Radium Hot Springs

ELECTORAL AREAS

"A" Elkford Rural, Elk Valley, Fernie Rural, Flathead, Hosmer, Sparwood Rural, West Fernie; "B" Baynes Lake, Elko, Galloway, Grasmere, Jaifray, Newgate, Rosen Lake, Tie Lake; "C" Bull River, Cranbrook Rural, Fort Steele, Mayook, Monroe Lake, Moyie, Wardner, Wycliffie; "E" Kimberley Rural, Meadowbrook, St. Mary's Lake, Sheep Creek, Skookumchuck, Ta Ta Creek, Wasa; "F" Canal Flats, Columere Park, Fairmont Hot Springs, Invermere Rural, Panorama, Windermere; "G" Brisco, Edgewater, Radium Rural, Spillimacheen, Wilmer