



Valhalla Wilderness Society Submission to Government on the Zincton Proposal for a Private Resort Town and Crown Land Development

June 19, 2020



Highway 31A has some of the highest value wildlife habitat and recreational/tourism lands outside of parks in the West Kootenays. It is already heavily used for noncommercial and commercial recreation. The proposed Zincton resort contemplates an explosive, malignant growth of development, human occupation and highway traffic in an area that is now occupied by provincially important populations of grizzly bears, mountain goats and western toads. When wildlands are left undeveloped, wildlife can continue to survive, but large-scale tourism development makes the whole area vulnerable to ruthless exploitation for large-scale profits. Professional assessments indicate that the proposal would greatly reduce wild species over a large area, while also sabotaging decades of investments by government and local citizens to enable sustainable, wilderness-based recreation and tourism.



Valhalla Wilderness Society

Box 329, New Denver, British Columbia, Canada V0G 1S0
Phone: (250) 358-2333, E-mail: vws@vws.org, www.vws.org

June 19, 2020

Kelly Northcott
Mountain Resorts Branch
Min. of Forests, Lands, Natural Resource Operations
#510-175 Second Avenue
Kamloops, BC, V2C 5W1
Phone: (250) 312 7235

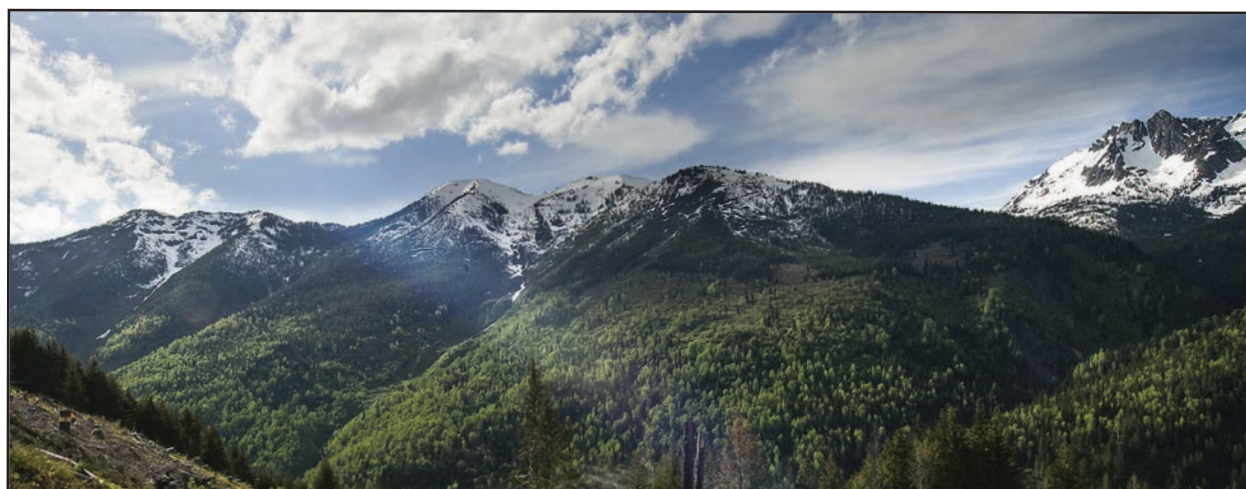
REVIEW OF ZINTON RESORT EXPRESSION OF INTEREST

I. SUMMARY

A new town, luxury playground and shopping promoted as an “authentic backcountry” experience

Mr. David Harley, the owner of Valhalla Pure, seeks subdivision permissions to build a resort town on 1,000 hectares of private land at Three Forks, with a capacity for 1,750 guests. That would be *three times* the population of New Denver, and the largest town within a 75-kilometre radius, ie, larger than Kaslo. According to the Expression of Interest (EOI) it would have “bunkhouses, private cabins, restaurants, bars, spas, general store, and other resort-related businesses” (he has mentioned “boutiques” plus a Valhalla Pure store). Elsewhere he has described the proposed private land development as “150 Cabins, 150 Residential lots, 40 commercial locations, 30 Staff cabins ... Plus 5 or 6 lifts, 3 on private land.”

The EOI also seeks tenure on 4,500 hectares of Crown land for a “luxury” backcountry lodge in Goat Creek watershed for 24 people, with trails for skiing and mountain biking. Elsewhere Mr. Harley adds “affordable huts” to the plan for Goat Creek. Gondolas would carry people to the top of London and Whitewater Ridges. “Connectors” (trails, ATV track or road is not specified) with Highway 31A would service the town and backcountry lodge. An additional “connector” is drawn on the map from Highway 31A around Goat Creek, north along Whitewater Ridge to Whitewater Peak on the boundary of Goat



London Ridge — Whitewater Ridge can be seen on the far right in the background. The far left end of London Ridge is descending to Three Forks. The proponent’s application covers both sides of London Ridge.

C. Pettitt

Range Provincial Park. About six kilometres of the proposal area are adjacent to Goat Range Provincial Park. The total resort area would follow Highway 31A for 12 kilometres between Three Forks and Retallack. It is said the resort would be “bigger than Whistler and Blackcomb combined”.

Highway 31A from New Denver to Kaslo, and particularly the segment from Three Forks to Retallack, is a very rare resource, as the highway itself offers wildlife viewing, fishing, skiing, hiking, and historical interest, while it is also the stem of numerous side roads that lead to backcountry and wilderness enjoyments. Existing trails within and surrounding the Zincton proposal, including the Galena, Whitewater Trails, K & S, Retallack Cedar Grove and Idaho Peak trails, are already highly popular with tourists and residents.

Although the scenic corridor has been, and still is being, regrettably logged, and although logging is ecologically destructive, it is less so than a resort town for 1,750 people. After logging is done, those species that use disturbed land will eventually have habitat on the cutblocks. This includes the grizzly and black bears, elk and moose in this proposal area. But a permanent human population centre is a permanent blow to all the more sensitive species — and one that will inevitably expand over time.

Wildlife biologist Wayne McCrory’s assessment lists three provincially blue-listed species (grizzly bear, mountain goat and wolverine) that have crucial habitat in the area and would be decimated by a significant influx of development and people. But the total damage to wetland, forest, subalpine and alpine ecosystems in or adjacent to the proposal, goes far beyond that.

Whitewater Ski Resort is a two-hour drive from Zincton. It offers backcountry touring and has no need to degrade the environment with massive infrastructure, as it is only 20 minutes away from Nelson with acres of accommodations, restaurants and shops.

In these days of biodiversity crisis, climate change and wildland fires, the whole idea of plunking a population centre for 1,750 people in the midst of a wildland area inhabited by grizzly bears and other threatened species of wildlife is *inappropriate and shocking*. This was already expressed by the public in the West and East Kootenays in the massive public opposition to the now failed Jumbo Glacier Resort, which cost BC decades of fruitless social and legal conflict.

VWS urges the province to reject the application for subdivisions, as well as the tenure application. If this is not done, we request that the Minister of Forests, Lands, Natural Resource Operations and Rural Development (FLRORD) order a major project Environment Impact Assessment.

II. ERRONEOUS OR MISLEADING ASPECTS OF THE EOI

The Valhalla Wilderness Society (VWS) asks the BC government to review its policy on Expressions of Interest. Surely when any document is put up for public review under the auspices of the Mountain Resorts Branch of FLRORD, it conveys some guarantee that the document has been vetted by government and held to some standard of credibility. Otherwise the government becomes a party to disseminating information that is, advertantly or inadvertantly, misleading to the public and prejudicial to the process. What is public opinion worth if it is based on false premises or key information is not available?

The Zincton EOI is a promotional document prepared for Mr. Harley by Brent Harley & Associates located in Whistler, and is more suitable for investors than for public review. It is biased in that it promotes eco-friendly aspects of the proposal, such as the walk-in nature of the resort town, or the use of solar panels, but contains no discussion of environmentally damaging aspects. There is no professional environmental evaluation, and though statements are made about wildlife, they are untrue. Aspects that would pose a major threat to the environment, such as sewage treatment for instance, are simply omitted. These aspects not only prejudice the public review, they force the public to investigate information that is basically useless because it is inaccurate to what is on the ground. For instance a “connector” trail between

Highway 31A and the boundary of Goat Range Provincial Park cannot possibly ascend to the peak of Whitewater Mountain, which has steep rock cliffs accessible only to mountain goats and technical climbers. Whether these connectors include gondola routes is impossible to tell because gondola routes are not shown. Other aspects of the EOI seem to be marketing propaganda: gondola-access and a “luxury” lodge with a 4-star chef are marketed as “authentic backcountry” recreation. When Three Forks to Retallack has been fragmented to pieces for a resort playground, where will the backcountry be? (Let us guess: Goat Range Provincial Park will become the backyard for this development.) Below we cite specific misleading elements.

EOI: “Unaltered, natural landscapes”

The scale of the development required to host 1,750 people would be very visible on the mountain slopes above Three Forks. There would have to be a major parking lot, the location and size of which is not shown in the EOI. Staff housing will apparently be near the highway along Kane Creek. Gondolas, the “luxury” lodge and gladed ski runs would have powerful visual impact .

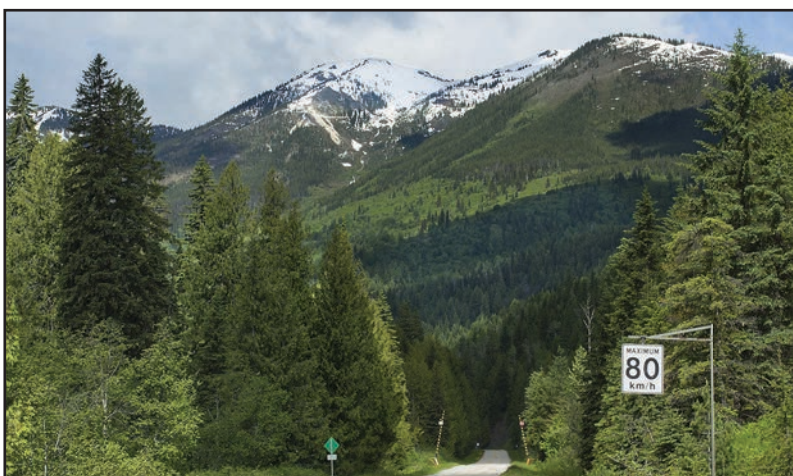
EOI: “1,600 metres of skiable vertical”

This cannot be verified due to key figures that are missing from the EOI, namely the exact top and bottom of the descent. It appears, however, that the top of the descent is calculated from 2,700 m, with the very top of Whitewater Mountain being 2,768 m. However, approximately the top 500 m of the mountain is accessible only to mountain goats and climbers with ropes. We are left with the impression that the Zincton proposal may *not* have the second longest skiable vertical in the region. The peak elevation of the ski run also concerns temperature and climate, and thus length of ski season and resilience to climate change. But due to the steep, rocky peaks, the skiable elevation may be somewhat lower than portrayed.

EOI: “Much of the terrain oriented northward ... shielded from solar exposure”

This is inconsistent with the proponent’s maps, and also contradictory to text elsewhere in the EOI, which states that the terrain is predominantly south and southwest facing slopes beneath Whitewater and London Ridges, and northwest and west facing on the Kane Creek side, with only “scattered pockets” of north and northeast facing slopes “across the proposal area.” (In reality virtually all the north-facing pockets are on the Kane Creek side). This could mean a short ski season as sunny days make a crust on the snow or turn it to slush with often accompanying high avalanche hazards.

AVALANCHES: As an added note of caution, there are three large avalanches that come down to Highway 31A from the proposed Crown land tenure area. There has been at least one death of a passing motorist. Every year the Ministry of Highways closes the road temporarily and bombs them from the air. But suppose skiers set them off before Highways can get there? Worse, in 2009 the road between New Denver and Kaslo was closed for several days due to a freak snowstorm that brought down avalanches on the highway at locations where no one could remember ever seeing them before — chiefly from



The photo shows gates that close Highway 31A between Three Forks and Retallack when the Highways department bombs the avalanche tracks on London Ridge. Taken near Retallack, looking into the proposed Zincton resort Crown land tenure.

the proposed Zincton resort tenure area. According to the Highways ministry:

“there were 33 slides along Highway 31A between New Denver and Kaslo, with 24 of them reaching the road. Most of them were between New Denver and Fish Lake.” (Valley Voice, Jan. 14, 2009)

Unless the province has in mind building avalanche tunnels as in the Rockies, avalanche control may become a great deal more complex. Indeed, inviting huge numbers of people to travel the winding highway in winter raises question about road maintenance, as the project raises all kinds of questions about services to the town.

EOI: “The proposed area does not contain any at-risk terrestrial species, or any ungulates or ungulate habitat.”

It is likely that the proponent considered only the federal *Species at Risk Act* (SARA) list for species at risk. However, some species are at risk provincially but not federally, so there is a provincial list maintained by the BC Conservation Data Centre.

- Goat Range Provincial Park, adjacent to the proposal, has a Master Plan that lists a potential 41 provincial species at risk including 10 red-listed and 31 blue-listed species.
- Some of the species at risk are charismatic megafauna known to occur in the proposal: Grizzly Bears, Mountain Goats and Wolverines, which are blue-listed in BC.
- For ungulates, White-tailed Deer, Mule Deer, Moose and Elk are seen along the highway. To claim there is not even habitat for ungulates in the proposal area is astonishing.



G. Parker

The proposal area is high-quality mountain goat habitat. They are blue-listed in BC. A big culprit is probably heli-skiing, but large numbers of people in their habitat would also impact them, especially in winter. If disturbed and caused to move in winter, they have little ability to make up the energy loss due to cold temperature and the paucity of available food. They are sometimes seen within the Zincton proposal, in Whitewater Valley, but less commonly and in fewer numbers than 20 years ago.

EOI: states that none of the fish species in the Kaslo River and Fish and Bear Lakes and associated creeks are listed in Provincial or Federal species at risk regulations.

The Bull Trout and Westslope Cutthroat Trout in these waters are both “Blue Listed” by the BC Conservation Data Centre and listed as “Special Concern” by COSEWIC, an independent scientific advisory panel for the SARA.

EOI: Zincton will contribute “to the transition to an eco-tourism-based economy, while ensuring the scale of development does not overwhelm the landscape or local communities. The existing environmental attributes and community character of the area is known for are key elements of the project’s overall offering to guests.

Ironically, overwhelming the village of New Denver, eight kilometres down the highway, is exactly what the proposal would do. Contrary to the claim that the Zincton proposal is just an extension of the direction the area and New Denver are already going in, the proposal represents a dramatic shift from nature-based tourism to tourism based on luxury accommodations, restaurants, and boutiques for shopping. In contrast, for decades both government and local residents have collaborated, sometimes with government grants, to cultivate the Highway 31A environment for true sustainable, nature- and wilderness-based recreation.

EOI: “Authentic” backcountry recreation.

VWS director Craig Pettitt, founder and former owner of Valhalla Mountain Touring, a cabin-based ski-

touring business in the Slocan Valley, states:

“The proponent plans to inject 1,500 skiers or mountain bikers a day onto London and White-water Ridges via two gondolas. There are inferences in the EOI that more ski lifts will be used. To inject these kinds of numbers into a natural landscape would soon destroy the naturalness of this proposal. The majority of backcountry skiers mainly travel in groups of 2 -6 people. More than that is considered a crowd. They seek out pristine powder slopes and natural landscapes free from the activities of humans. It is folly to equate 1,500 skiers on 4,500 hectares of terrain with a backcountry experience. Multiple laps by 1,500 guests would soon track up all the skiable terrain, which is far from a natural, ‘backcountry’ experience. Back-country lodges generally push numbers up to a dozen; depending on the size of a cat-skiing operation, maybe up to 24. Heli-skiing, because of the speed of transport, may push up to 36 or 48 over a vast terrain, which is a far cry from Zincton’s 1,500.”

III. ENVIRONMENTAL IMPACTS

The intensive energy consumption of a ski hill with gondolas and grooming of some slopes lead us to be very skeptical about the claim that the project will be “zero carbon”. A customary problem with claims for alternative energy sources is the assumption that they will allow “development as usual”, when in fact a drastic reduction of development is required. Otherwise, society’s addiction to economic growth overwhelms what alternative energy sources can do.

Despite claims that the resort town would be eco-friendly, it would have all the traffic, parking lots, garbage, sewage, lawns, water works and dwellings associated with a population three times that of New Denver. New Denver is threatened with a town of three times its population upstream; if anything goes into the creeks, it will travel all the way to Slocan Lake. This is a huge issue blithely ignored by the EOI. We note that the proponent’s private land extends across Seaton Creek. This could potentially provide room for expansion into residential subdivisions after the resort is developed, judging by the course that expansion of other ski resorts has taken.

Chairlifts and glading for ski runs would require a lot of logging and forest fragmentation, and would have a pronounced visual impact. Trail grooming has negative impacts on vegetation and soil. Chairlifts will take up to 1,500 hikers and bikers per day into the high country, which will quickly cause soil compaction, vegetation trampling and replacement of native plants with invasive species.

IMPACTS ON GOAT RANGE PROVINCIAL PARK

One main pillar of the wilderness-based recreation along Highway 31A is the Goat Range Provincial Park, proposed and successfully advocated by VWS at the CORE land use planning process in 1994. Few people today know that the park was originally proposed as the White Grizzly Provincial Park, named after a concentration of grizzly bears and gene pool of which some 5-10% of the bears are predominantly white.

Provincial parks, even the larger ones, are too small to contain the large home ranges and habitat needs of grizzly bears. Eighty percent of the Goat Range Park is 1,400 m or higher, ie, in the ESSF biogeoclimatic zone,



C. Pettit

This cub shows the classic colouring of the white grizzlies of Goat Range Provincial Park: The face, ears and legs may be chocolate brown, while the head and body are predominantly white — very much like a Siamese cat. There are many partial variations. The bears flow out of all sides of the park in early spring or when the Kokanee salmon are running, providing grizzly bear viewing for the public and a couple of commercial guide operations.

subalpine parkland, or alpine meadows. This makes it ideal denning habitat as well as summer alpine habitat for grizzly bears. But in spring the bears follow avalanche tracks down to Highway 31A to feed on early spring vegetation, where they are sometimes seen along the road from Three Forks to Retallack. Once snow melts from the Whitewater trail, they can be watched on avalanche tracks outside the park, as the trail supports reliable and safe grizzly-bear viewing.

As described in Wayne McCrory's wildlife assessment, in autumn the bears congregate outside the park in the extensive huckleberry patches on London Ridge. The travel corridor between the park and the highway, or London Ridge, is the Goat Creek pass between Whitewater and London Ridges. Thus McCrory has assessed that the large number of people attracted to London Ridge and the proposed Goat Creek backcountry lodge and huts could wipe out the park's grizzly bears, or at least reduce them to a small, fragmented population. Population decline will result from chronic bear-human conflicts including mortality, displacement, and diminished reproduction due to stress.

McCrory cites the example of Lake Louise in Banff National Park, which researchers found to have the highest grizzly bear death rate in the Rocky Mountains due to the overlap of extensive buffalo berries and very high numbers of people. The Zincton proposal plans to bring thousands of people by gondola onto London Ridge, which is rated by McCrory as high quality habitat due to extensive huckleberry areas, alpine/subalpine Glacier Lily and Spring Beauty corm feeding areas, alpine denning habitat and travel corridors (Goat Pass).

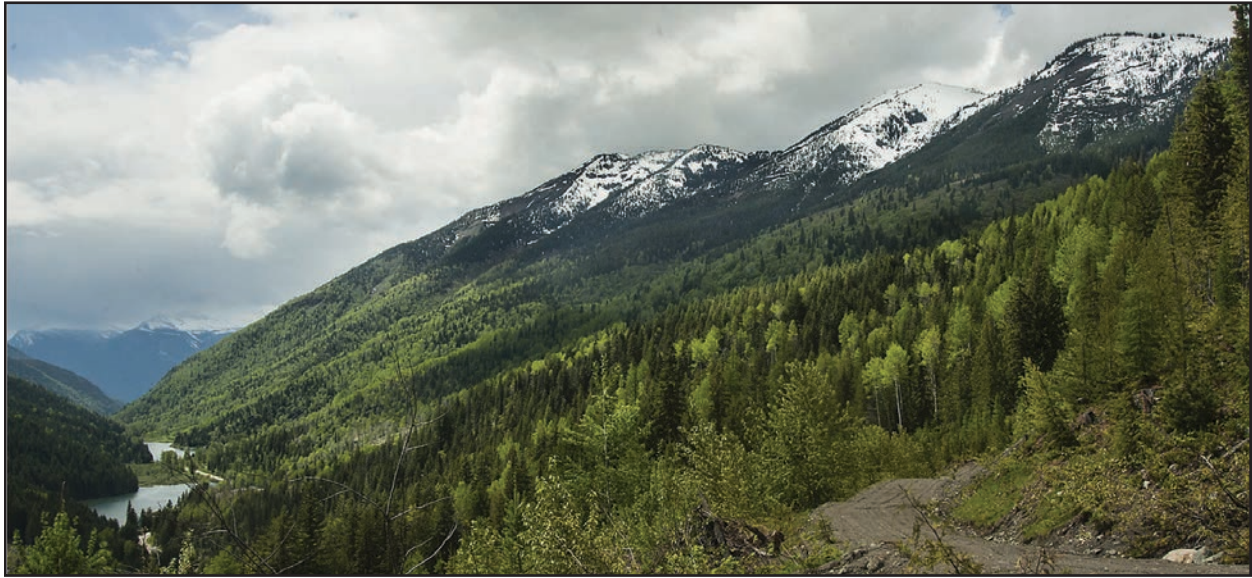
Regional and international significance of northern subpopulations of Central Selkirk Grizzly Bears

The extirpation of grizzly bears from most of the US has proceeded north as human population expands, with recovery efforts in the northern states (Montana, Wyoming and Washington) and small, threatened populations in the southern Selkirk and Purcell Ranges of BC. Scientists believe that the major factor fragmenting and reducing these populations is human settlements, and such related impacts as high levels of traffic on highways.

Moving further north in the Selkirk Range, both Valhalla and Kokanee Glacier Provincial Parks have small and diminishing grizzly populations. But the park still further north — the Goat Range Provincial Park — is in *the most southerly area in BC believed to have relatively healthy numbers of grizzly bears*; and they have connectivity with other grizzly populations across mountains to the east and north, including Glacier National Park. Scientific research suggests that the northern Central Selkirk grizzly bear populations, around Goat Range Provincial Park and the Purcell Conservancy, are critical for the survival of fragmented populations to the south. (Proctor et al. 2011)

The BC Auditor General's report of October 2017 on Grizzly Bear Management noted that connectivity of habitat was a key problem for future grizzly bear survival. The AG said the province's parks are too few and scattered to provide the necessary connectivity. The AG report echoed the findings of researchers, that survival of the threatened southern populations is dependent upon improving connectivity with more robust populations, of which the researchers have specifically identified the northern Central Selkirk population. The Goat Range Provincial Park and Purcell Wilderness Conservancy are doubtlessly key factors in maintaining these populations in a relatively healthy condition. But the bears survive on the very edge of the advancing development from the south. They need the defacto wilderness surrounding the parks.

We omit here what would be the substantial impacts on other park wildlife, including mountain goats, wolverines and ptarmigan, in the hopes that the province will have the good sense to protect the grizzly bears from further development, and thereby save the other species too. Protected areas are meant to have buffer zones around them, for kinds of development with which wildlife can co-exist, and for maintaining the visual integrity of park scenery. If the Zincton proposal goes ahead, the Province will be in the position of having a 76,000-hectare provincial park to protect such species as grizzlies, mountain goats and wolverines, and putting a ski resort near the boundary that will decimate them.



Fish and Bear Lakes. The Zincton proposal covers almost all of the area to the right of the lakes and goes over the summit and down to Kane Creek on the other side.

C. Pettitt

IMPACTS ON THE HIGHWAY 31A RIPARIAN ECOSYSTEM

A rich and diverse riparian complex exists from Three Forks to Retallack, across the highway from the Zincton proposal. It consists of a combination of Seaton Creek, which in numerous locations has been expanded into small ponds by beaver dams, as well as Bear and Fish Lakes on the Zincton summit. It is a wildlife-rich area which provides roadside picnics amidst grand beauty, wildlife-viewing, fishing, ski touring, and ice-fishing. Black and grizzly bears, elk, moose, deer and waterfowl are often or occasionally seen. The large increase in traffic would likely have a substantial impact on the wildlife in terms of highway mortalities or simply driving them away. But otherwise, it may seem that the Zincton proposal would



C Pettitt



A Peters



C Pettitt

Just across the highway from the Zincton proposal, beaver dams have created a rich marsh-pond area that attracts moose and harbors a flock of Canada geese and various duck species. The calf moose above held court with camera snappers last summer. The moose are known to use the forest upslope from the wetlands and Fish Lake — in the area of the proposed resort. Fish Lake is habitat for a significant population of Western Toads, as well as salamanders and snakes. In 2013 a professional survey of land snails in the region discovered a blue-listed snail, *Oreohelix strigosa strigosa*, in a meadow near the lake.



A Sherrod

have little effect on the riparian zone, which lies outside the proposed tenure boundaries.

To the contrary, the higher elevations of London Ridge are connected to the valley bottom by strong ecological linkages through which the development could have a very damaging effect on the riparian ecology below. One of these linkages is the Western Toad. It breeds in the two lakes, with Fish Lake having the largest population, but spends most of its life cycle on the forested slopes above the lakes. Western toads have been found by the VWS research team as high as 1,700 m, at the snowline in June, ascending Watson Creek between the two lakes. It is likely that they climb all the way to the alpine. On the other end of Fish Lake, Goat Creek is their nearest ascent route.



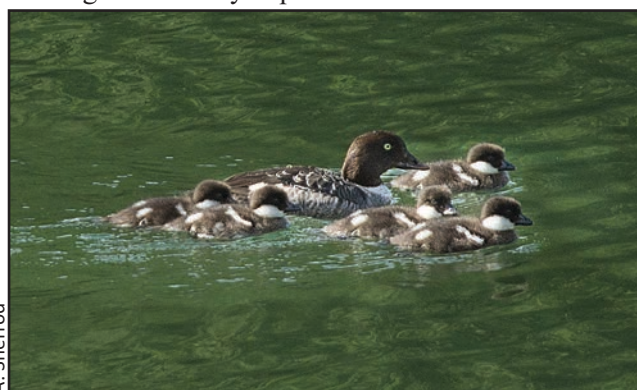
A. Sherrod

The popular picnic area at the Fish Lake pullout draws attention to the toad migration from many travellers. The blue-green pipe that forms the toad fence passes in front of the two picnic tables.

There is no doubt at all that the Zinton development — the “luxury” lodge, huts, mountain bike trails, “highway connectors” and influx of people — will have major impact on the western toad population, by directly killing the toads on the trails and highway connector. *But why should that matter?*

Put in the simplest terms, human beings and their developments are spreading to the extent of annihilating whole swathes of species. Hundreds of scientists have issued warnings that biodiversity loss could end up wiping out human beings, since our survival is supported by an interconnected web of millions of species. They recommend that 50% of the planet should totally protected. It is common to focus on the charismatic megafauna, but all of these large species survive at or near the top of a food pyramid which, at its base, is composed of thousands of smaller species. Leading biodiversity experts warn that this is where ecosystems are most in danger of collapse due to a massive ongoing loss of small species — and many species means many ecosystem functions.

Western Toads, for instance, eat large quantities of insects such as mosquitoes. Their tadpoles eat algae, which helps to prevent algal blooms in lakes. And when the tadpoles turn to toadlets and emerge en masse from the lakes where they were born, a variety of other species feed on them. The Western Toad is a prolific breeder, producing hundreds of thousands of toadlets every year. Only a tiny percent survive at the end of the year, which means that the majority of that huge amount of biomass has gone into feeding other animals, or else returns its nutrients to the ecosystem. At Fish lake crows, ravens, dippers (a bird that dives under water in streams), bald eagles and over-stuffed garter snakes are known to eat the toadlets. And because the toadlets migrate uphill, much of their nutrient input is carried into the forest.



A. Sherrod

This Barrow's Goldeneye is raising a family on Fish Lake. Canada Geese also raise young along the highway, though they seem to prefer the beaver ponds more than the open lakes.

There is an alarming worldwide decline of amphibians, due to a host of factors. Western Toads are known to have declined substantially, with extirpations in the US and on the BC coast, and suspected decline in the

East Kootenay region. The species is listed as “Special Concern” by COSEWIC and on Schedule 1 of the Species at Risk Act. According to Environment Canada, “the main threats ... are transportation and service corridors (habitat fragmentation and road mortality), invasive species and amphibian chytrid virus.”

These are some of the reasons why VWS initiated what is now a six-year conservation project, having cost \$165,000 in grants alone, aimed at reducing highway mortalities as the toadlets migrate from the lake over the highway to reach their upland forest habitat. Contributors and collaborators in the project include the Fish and Wildlife Compensation Program (FWCP), the BC Ministry of Transportation and Infrastructure (MOTI), the Valhalla Wilderness Society, Columbia Basin Trust, Yellowstone to Yukon Conservation Initiative, the Regional District of Central Kootenay – Kootenay Lake Local Conservation Fund, and others including local biologists.

The toads’ reproductive cycle involves three migrations: After winter hibernation in the forest, adults migrate to their natal lakes, where they breed in shallow waters, each female laying up to 17,000 eggs. The adults then move back to their mountain habitat. In early summer, tadpoles metamorphose into hundreds of thousands of toadlets that move from water to land in late summer and autumn. Where breeding lakes are adjacent to active roads, roadkills pose a significant conservation threat to the survival of the species. A single vehicle can result in many highway mortalities, posing a substantial risk to gravid females that may carry over 15,000 eggs per adult.

After 3 years of trying different designs, a unique 500 m migration fence was built from Fish Lake through the rest stop to Goat Creek, to direct tens of thousands of migrating toadlets to an artificial bridge underpass installed under the Goat Creek Bridge. In 2019, a remote camera captured over eleven thousand toadlet images, and photos only partially covered the migration.

The conservation project attracts the attention of numerous passing travellers. Local volunteers are directly involved in moving the toads and toadlets across the highway during migrations. A public education program enlists volunteer “toad ambassadors” who are trained in educating the public about the species and the local efforts to protect them. The Fish Lake rest stop was fitted with a large interpretive sign and educational pamphlets, and various other forms of public education have occurred throughout the study, including radio interviews, public talks and newspaper ads.

While reduction of highway mortalities at Fish Lake has been dramatic, it is a long way from being complete, and an increase in the volume of traffic on the highway would result in many more mortalities. But there would also be many more mortalities upslope in the forested part of the habitat if the backcountry lodge is built or the area is fragmented by mountain bike trails. As with grizzly bears, if the Zincton proposal is approved, the government would be tearing down its own conservation accomplishment.

The Fish Lake Western Toad population, based on data collected so far, appears to be healthy and numbers may be increasing because of recent conservation efforts. This finding supports the understanding that the corridor they inhabit is extremely valuable in terms of ecosystem functionality, considering current levels of disturbance. VWS biologists are now working closely with the MOTI on the more intensive mitigation stage of the project. MOTI is currently designing and costing two or three toad highway underpasses with directional fences. The proposed Goat Creek development would be a severe detriment to this project.

Other riparian species

The richness of the riparian habitat has much to do with the beavers, which create habitat for Western Toads and Moose, among many other species. The moose seem to spend the day somewhere up the mountain in Zincton’s proposed Crown land tenure; their droppings have been seen up to 1,700 m along Watson Creek, in the same location where toads have been found. In early morning and dusk they can be seen in the beaver ponds or Fish Lake and are very popular with local residents.

Elk are not so much a riparian species, but they are seen along the same segment of the highway as moose, which indicates the richness of wildlife habitat, especially around Zincton. Regardless of how well the development is built or managed, perhaps the chief impact on wildlife is due to the sheer number of people who will invade the area. One result is the massive penetration of humans into the backcountry on existing trails, by foot or by mountain bikes which take them farther and faster.

- Research on the elk herd near the resort town of Vail, Colorado has determined that merely hiking on a trail played a significant role in the radical decimation of the herd. The research showed that about 30% of the elk calves died when their mothers were disturbed an average of seven times during calving. Models showed that if each cow elk was bothered 10 times during calving, all their calves would die. (Phillips, Allredge, 2000; Shively et al., 2005)
- According to Parks Canada's Panel on Ecological Integrity: "The cumulative impact of many people taking part in an apparently innocuous activity can result in major stresses on ecological integrity. For example, while one hiker passing through a grizzly bear feeding range may not affect bear behaviour, as few as 100 hikers in a month may cause a bear to abandon that range." ("Unimpaired for Future Generations?", 2000)

For these reasons VWS pleads for the BC government to take action to stop species loss in BC, by not only rejecting the Zincton proposal, but also stopping the government's own course of rampant commercialization of BC's remaining wildlife habitat and high-quality recreation lands.

Scientists warn that mountain biking is a serious threat to bears (and humans).

Today there are 46 mountain bike trails covering 143 kilometres in a triangle between Bannock Point, Rosebery and Sandon, mostly along Carpenter Creek. In the immediate vicinity of the Zincton proposal, the old railroad grade supports mountain biking from Bear Lake to Sandon, Sandon to Three Forks, and 18.5 kilometres from Rossiter Creek to Kaslo. The mountain bike/hiking trail directly across the Three Forks junction from Mr. Harley's private property in summer is often crowded with vehicles that have brought a number of bicycles.

People who have studied the impacts of mountain biking say that the most damaging thing is the unnatural push to build new trails — in part because the experience of descending mountain trails doesn't last long and riders get bored doing the same trail more than a few times. But in addition, mountain biking is big business for outdoor equipment stores, and exploiting the explosion of mountain biking has become a key economic strategy for lodges and resort towns. By operating during summer and the shoulder seasons, they avoid the seasonal roller coaster of the skiing business. The result is that what's left intact of our natural landscapes from logging is further fragmented, and it is not only the trails but the people on them that drives away wildlife.

Zincton wishes to transport people and their bikes onto London Ridge by ski lifts, for "epic" rides downhill. A number of these rides may turn out to be "epic" in more ways than one: bikers have actually collided with grizzly bears.

"Mountain bikers are at particular risk ... Schmor (1999) interviewed 41 mountain bikers in the Calgary region who cycled in the Rocky Mountains. The responses indicated that 84% of survey participants had come within 50 m of a bear while mountain biking and 66% of the encounters clearly startled the bear ... Herrero and Herrero (2000) suggest that grizzly bears are more likely to attack if a human is closer than 50 m before being detected."

Parks Canada, "Mountain Biking: A Review of the Ecological Effects", 2010

"Mountain biking is a recreational activity that involves increased risk and danger of surprise

encounters with bears because 1) it is relatively quiet; 2) the high speed of bike travel compared to hiking; and 3) the necessity of the bike rider to focus his/her vision down on the trail close to the bike to avoid obstacles instead of looking ahead for bears, especially on single-track trails.”

“Board of Review Report on the death of Mr. Brad Treat from a grizzly bear attack”, 2017

“Bears respond to surprises usually by fleeing, but sometimes by attacking whatever it is that is surprising them. Events like runners and bike riders and anything else that suddenly thrusts a disturbance or surprise into their environment, they sometimes respond by attacking. I try to avoid mountain biking in any area that is grizzly bear habitat. There are plenty of places that aren’t.”

Dr. Steve Herrero, Professor emeritus, University of Calgary,
New York Times, Oct 7, 2019
Author of *Bear Attacks: Their Causes and Avoidance*

“I do believe that mountain bikes are a grave threat to bears — both grizzly and black bears — for many reasons ... High speed and quiet human activity in bear habitat is a grave threat to bear and human safety and certainly can displace bears from trails and along trails. Bikes also degrade the wilderness character of wild areas by mechanized travel at abnormal speeds.”

Chris Servheen, US Fish & Wildlife grizzly bear specialist
adjunct research professor, University of Montana
Mountain Journal, 2020

IV. IMPACTS TO EXISTING RECREATION AND TOURISM ASSETS

Zincton’s EOI admits that “residents have been careful not to lose the unique local character of the region and work to ensure a high quality of life the area is known for.” Indeed that is true. For decades, residents of New Denver have kept most of our tourism development in town, and our enhancements at recreational sites minimal, so as not to ruin their natural character, which draws European visitors here by droves. The visitors no longer have wilderness or natural forests in their countries, and many are eager to get “off the beaten path” and “away from crowds”. Many local residents in the Kootenays seem to have the same desire.

Ironically, the EOI also describes how recreationists these days want to get away from traditional ski resorts, resulting in rapid growth of backcountry recreation businesses. These people are repelled from the crowds and luxury development at traditional resorts — and today, skiers can browse websites that evaluate the relative environmental impact of ski hills.

No wonder the EOI promotes Zincton as an “alternative” for these people who want “pure nature”. Except it isn’t. It seems to want the marketing lure of backcountry recreation and the profits of large-scale, luxury-based tourism. But what good is a cabin with solar panels for heat if you destroyed a piece of backcountry occupied by grizzly bears to build it?

The fact is that New Denver and Kaslo are already uniquely positioned to provide what the more environmentally-conscious skiers and other recreationists are seeking. In the following section we hope to inform government decision-makers about what has already been done on Highway 31A to enhance outdoor recreation, and how it stands to be damaged by the Zincton proposal.

1. Highway 31A

Because a resort town would bring greatly increased traffic to Highway 31A, the highway itself becomes

an issue. Left as it is, the highway itself is a potent tourism asset, but only because it is 1) scenic, 2) not heavily used, and 3) passes by natural features — lakes, streams, beaver ponds, mountain views — greatly esteemed by travellers. It is frequently used for bicycle touring. The most scenic area, between Three Forks and Retallack, has pull outs that are frequently occupied by travellers enjoying the scenery, taking photographs or using picnic tables at Fish Lake. Because the highway is narrow and winding, the prospect of loading it with large numbers of vehicles is a great concern, including because it will lose its “off the beaten path” quality that draws tourists already.

Zinton Pass (at Bear and Fish Lakes)

Mountain Passes serviced by all weather highways are very special places for public non-commercial recreation in BC. Passes such as Rogers Pass on Highway 1, Kootenay Pass on highway 3, Zinton Pass on Highway 31A and Monashee Pass on highway 6 all attract high levels of all-season non-commercial recreation use, but most especially in the winter.

The elevation gain provided by these highways makes it possible for foot-powered recreationists to leave their vehicles and access alpine ridges and summits without mechanical assistance. In winter that elevation gain is sufficient to deliver people from the wet soggy snows of the valley bottom to the cold dry powdery slopes of the mountains. The popularity of these areas is growing yearly and can be witnessed by the number of vehicles parked along these highway corridors.

The Zinton summit between Kootenay and Slocan Lakes is the closest high elevation pass to people living in the area defined by Balfour, Winlaw, Nakusp and Lardeau. The spectacular views of the alpine London Ridge and the rugged peaks of Whitewater Ridge and Blue Ridge draw backcountry enthusiasts from all over this region and beyond.

The Bear & Fish Lakes area (Zinton Pass) is used extensively for cross-country skiing and snowshoeing around the lakes and on old highway and railroad right-of-way, back to Retallack. Backcountry enthusiasts ski tour north of the highway from Bear Lake, up onto London Ridge.

The Zinton summit area is not lacking in amenity-based tourism development. There is the existing Retallack Resort 12 kilometres up the highway from Mr. Harley’s proposed “Mountain Village”. The experience of some local non-commercial skiers, of being displaced by Retallack from favourite skiing areas, has been bitter, but added to that, Retallack has displaced noncommercial users in summer in Jackson Basin with repetitive downhill mountain biking. This is an area that was long a favourite with local residents for enjoyment of the scenery, hiking, grizzly bear viewing and berry picking. The recreational conflicts have been so problematic that in March of 2018 the province issued a one-year moratorium on new winter adventure tourism tenures until disputes could be settled, yet no resolution has since been achieved and tenure proposals continue to divide the surrounding communities.

Motorized recreation, and even mountain biking, can penetrate deeper into the backcountry much more quickly than people on foot. Zoning has to consider areas for human-powered recreation. There are few of



Bear Lake beside the highway is used in winter for ice fishing. But the autumnal aspen trees tell another story: they are the recovery forest after a couple of forest fires in the early 1900s. With climate change now bringing huge fires, British Columbians are told that putting development in wildland areas has caused much problem: when fire-fighters should be focusing on protecting municipalities and other key places, their resources are increasingly scattered to cover dwellings in natural areas that could be left to burn. The proposed backcountry lodge and huts would be located in Goat Creek watershed, just up the highway from this photo.

these all weather passes in BC, they draw large numbers of people already, without any commercial infrastructure and they should all be zoned for noncommercial recreation.

2. Goat Range Provincial Park

The key to protecting this reservoir of wildlife is to limit access — which BC Parks has always recognized. It is very well known that development of natural areas sets in motion a vicious cycle in which hordes of patrons demand, and provide a market incentive, for using politics to pry open the door of parks for further development. This is why people who know parks say that sooner or later the crowds brought by Zincton resort would become a lobbying force to break down protection of Goat Range Park. The province has made a considerable investment in protecting the ecological integrity of the park, but today we know that the park creations of the 1990s were not sufficient to maintain their biodiversity. The province has made sufficient revenue from logging the adjacent highway corridor to a disgraceful degree, it shouldn't need to wring more profit out of it by turning the best part, with the greatest scenery and most wildlife, over to yet another private business to exploit; if it does, it will be destroying what previous governments aspired to preserve.



Along the Whitewater Trail, accessed by a backroad off Highway 31A, hikers watch grizzly bears on the avalanche slopes across the valley.

3. Whitewater, Mt. Brennan and Alps Alturas Trails.

The Whitewater Valley and Alps Alturas trails were built outside the Goat Range Provincial Park by VWS with an Environment Canada Grant and Ministry of Forests guidance. Alps Alturas is not in the Highway 31A corridor and is not considered here, but is part of the low-impact development around the park that enriches New Denver's recreation/tourism assets. The grant also enabled VWS to improve the old mine trail up to Mt. Brennan, which is also an important place for grizzly bears.

Initially, the trail in the spectacular Whitewater Valley passed through high-quality Grizzly Bear feeding areas on the east side of the valley, where hikers often had serious run-ins with grizzly bears. Independent bear biologist McCrory was provided a contract from the Ministry of Forests (Recreation Branch) to conduct a Grizzly Bear risk assessment that identified a new route on the opposite side of the valley through very low-quality bear habitat that would greatly reduce the risk of encounters. With an Environment Canada grant, and permission from the BC government, VWS constructed the new trail on the west side that for several decades has provided fairly reliable Grizzly Bear viewing for noncommercial hikers as well as a local guiding business.

The Whitewater Trail lies within the Zincton resort proposal. The EOI infers an intent to use the trail in winter, and claims that summer use will not be affected. VWS is strongly opposed to the winter use, due to disturbance of Mountain Goats and Wolverines. But the resort's visitors will get there in any season. Let's not kid ourselves, Whitewater Trail is a very valuable asset, and the question is whether it is going to be protected for the people of this region, or allowed to become the star asset of a private ski resort. As Grizzly Bears diminish due to high numbers of people, this trail, paid for by the taxpayers of Canada and BC, will no longer provide the frequent Grizzly Bear viewing for which it is now well known.

4. Retallack Cedar Grove Trail

Across the highway from the turnoff to the Whitewater Trail is yet another gem for the appreciation of “unaltered nature” — one that also stands to be heavily damaged by excessive visitation: the Retallack Cedar Grove Interpretive Trail, built by VWS through its Environment Canada Grant. This enables travellers to experience a stand of trees likely 800 years old or more, just off the highway. VWS designed and built the large sign at this trailhead. While it is well known that large crowds can



damage the vegetation of an old forest, little consideration may be given to protecting the experience of visitors. The awe induced by an old forest cannot be felt except in quiet and some degree of solitude, or communion with a few friends. The combined Retallack and Zincton resorts could substantially deteriorate the quality of visitor experience now possible in the grove.

5. Idaho Peak

Idaho Peak is a stunning alpine environment with road access maintained every year, and a trail built to accommodate even many elderly people, embellished with interpretative signs and benches for weary hikers to rest. It is probably the most popular and valuable recreation site in the West Kootenays. Over 100 visitors a day is not uncommon. A private mini-bus business now offers daily drop off and pick up from New Denver.

Grizzly Bears fled from Idaho Peak quite a few years ago, but perhaps due to pressures in other areas — such as mountain biking in Jackson Basin — a sow and cubs have returned to the meadows around Idaho Peak the last couple of years. Predictably, last year there was a dangerous close encounter between a hiker and one of the nearly-grown cubs. An already abundant volume of hikers meant that some ignored the warning of one hiker who had just been charged, and they too were charged by the bear.

Idaho Peak is an incredibly fragile alpine environment. Allowing Zincton to build a 1,750-person resort just down the Sandon Road from the turn-off to Idaho Peak may spell disaster for the subalpine and alpine ecosystem, and for the visitor experience as well. But this same thing is true of the equally fragile sub-alpine and alpine environments on the London and Whitewater Ridges. The government granting those areas for access by gondola for thousands of people, even during the summer with mountain bikes, would be absolutely unconscionable.

V. “LARGE SCALE TOURISM IS NOT JUST ANOTHER ECONOMIC ACTIVITY”

Contrary to the expectations that Zincton would boost New Denver businesses, the ski village would be more or less self-sufficient and, at three times the population of New Denver, might attract customers away from businesses in New Denver. What would it be like if New Denver residents became outnumbered by a permanent flow of transient visitors? What would it be like for businesses offering accommodations in town, if Zincton draws most tourists out of town? The Project Rationale section of the EOI states:

“ski, boot and binding suppliers report 20-40% annual growth in units sold. Backcountry equipment surpassed 12% of all ski equipment sales in 2015 and continues to expand rapidly ... it is reasonable to anticipate that backcountry gear will soon equal more than 20% of total ski equipment sales...”

VWS asks the government decision-makers to think about the value of a relatively small area that has the Whitewater Trail, the Retallack Cedar Grove and the Idaho Peak trail in one dazzling triangle of magnificent natural heritage. Should all this, carefully nurtured over decades by local residents and past governments, be turned into the backdrop for a private resort business to increase the sales of ski equipment?

Professor Thomas Power, during the years when he was an economist at the University of Montana, lauded tourism as one important factor in a transition economy from primary resource extraction. But he drew a big distinction between wilderness-based tourism that carefully preserved its resource base in a natural condition, and “large-scale” tourism. He warned:

“Large-scale tourism brings a constant flow of strangers through a community. A flow of thousands can engulf cities with populations of 10,000 to 50,000 and obliterate small rural towns, replacing the residents with entirely new populations ... Resort towns such as Aspen, Colorado and Jackson, Wyoming, have almost completely transformed and swallowed up their ‘original’ communities ... Large scale tourism is not just another economic activity, with it can come cultural change and the physical transformation of a community...”

Economists have coined the term “natural amenities”, such as clean water, clean air, beautiful scenery and nearby outdoor recreation opportunities.. Dr. Power points out that tourism isn’t the only way that natural amenities benefit communities. In fact, he presented statistics showing that the greatest value of natural amenities to communities was in attracting small, home-based businesses:

“People care where they live. They care about the qualities of the natural and social environment that make up the living environment. They are willing to make sacrifices to obtain access to these natural amenities. High quality natural environments draw people and businesses to areas even when economic opportunities are otherwise quite limited.”

And he warns:

“There are a number of serious problems associated with tourism of which communities should be aware. First, employment tends to be low-income, unskilled and dead-end. Second, vacation homes and other tourist developments tend to drive up property values and the cost of living, driving out existing residents. Third, tourism brings in a flood of temporary visitors whose holiday mood and disregard for the local community can disrupt and permanently alter it. Fourth, tourists and recreationists put a lot of wear and tear on the natural landscape. Tourism isn’t always, or even often, environmentally benign.”

The middle and older generations in our area have enjoyed years and decades of high quality of life because we have chosen to balance the quality of our living environment with income from catering to visitors. The cost of outdoor equipment is a snapshot in time that may vanish in the batting of an eye lash, whereas the natural and wilderness values of the undeveloped landscapes around us are enduring and can sustain us into the future if properly protected.

It was always our belief that governments required commercial operations to obtain permits so that managers could limit the nature-destroying development and activities, and the number of visitors, to sustain a quality natural experience for everyone. But non-commercial recreationists in our area have been recognizing that they are being betrayed as the provincial government, in thrall to large-scale tourism, seems bent upon covering all the highest quality examples of our natural heritage with numerous overlapping, long-term, money-making commercial tenures. And while the commercial tenures are not exclusive, and do allow noncommercial recreation, all too soon people looking for a natural experience will have to look elsewhere for what they seek. But where?

VI. VALHALLA WILDERNESS SOCIETY CONCLUSIONS

- The Zincton resort town, lodge and Crown land application should be rejected outright.
- If this doesn't happen, the Minister should order a major independent Environmental Assessment.
- There should be no further commercial tenures including a resort or lodge development, or further helicopter use, in the Highway 31A Corridor. Accommodations for the area's visitors should be located within New Denver or Kaslo, which will benefit these towns.
- In no case should mountain biking occur in the high-quality grizzly bear habitat of the Zincton proposal, as this is a serious danger to both bikers and bears.
- A tourist town at Three Forks will cause ecologically devastating overuse of Idaho Peak, Wild Goose Basin, and other valued recreation sites.
- In no case should the Whitewater Valley be included in any further commercial recreation permits. Increased visitation will drive the grizzlies out and end grizzly bear viewing. Winter use will disturb and imperil grizzlies, mountain goats and wolverines.

VII. CITATIONS

Boswell, R., "Jewel of the Rockies most lethal site for grizzlies," Vancouver Sun, May 26, 2004.

Frid, et al., "Human-caused Disturbance Stimuli as a Form of Predation Risk," Cons Ecology, 2002.

McCrory, Wayne, wildlife impact assessment of the Zincton EOI, June 2020.

Mowat, G, et al., "Grizzly Ursus arctos and black bear U americanus densities in the interior mountains of North America", J Wildlife Mgmt, Jan. 2005.

Panel on Ecological Integrity, Parks Canada, "Unimpaired for Future Generations?", Vol. II, 2000.

Parks Canada, "Mountain Biking: A Review of the Ecological Effects", prepared by Michael Quinn and Grea Chernoff, Feb. 2010

Phillips, G. E. and Alldredge, A. W., "Reproductive success of elk following disturbance by humans during calving season," J. Wildlife Mgmt, 2000.

Power, T.M., "Lost Landscapes and Failed Economies," Island Press, 1996.

Power, T.M., "The Economic Values of Wilderness", Internat'l. Jour. of Wilderness, Vol. 1, No. 3, 1996.

Proctor, et al., "Grizzly Bear Connectivity Mapping in the Canada-United States Trans-Border Region", Wildlife Mgmt, 2015.

Servheen, C, et al., "Board of Review Report on the death of Mr. Brad Treat from a grizzly bear attack", 2017, igbconline.org/wp-content/uploads/2016/03/160629_BOR_Report_Treat_NCDE.pdf.

Shively, K.J. et al, "Elk reproductive response to removal of calving season disturbance by humans," J Wildlife Mgmt, 69(3), 1073-1080, (1 July 2005).

Wasser, et al., "The Influences of wolf predation, habitat loss and human activity on caribou and moose in the Alberta oil sands," Front Ecol Environ 2011; 9(10): 546-551, 21 Jun 2011.

Wilkinson, T., "Griz expert says 'mountain bikes are a grave threat to bears,'" Mountain Journal, 2020.