

SLOCAN LAKE STEWARDSHIP SOCIETY (SLSS)
Response to the ZINCTON ALL-SEASONS RESORT
Expression of Interest

Date: June 5, 2020

The Slocan Lake Stewardship Society's underlying mandate is the protection of water quality and flow into the Slocan Lake Watershed. The proposed Zincton All Season Resort covering a village site, staff housing, accommodations, parking lot, gondola infrastructure, skiing terrain and extensive mountain bike trails, is deeply concerning from a hydrological, wildlife and sustainability perspective. In the face of continual climate change, we need to treat our ecosystems sensibly and use an integrated approach as to how we manage those ecosystems in order to protect biodiversity, our forests and water sources. Our overarching concerns with the 'Zincton All Season Resort' EOI are outlined as follows:

Sensitive Hydrology: The recreational expansion and envisioned network of trails are along London Ridge and between Kane and Seaton Creeks. There are 32 tributaries from London Ridge into Kane and Seaton Creeks. These creeks are two of the three major flows west from this area into Slocan Lake and form the aquifer that then feeds New Denver water wells and systems. No hydrologic information or understanding has been provided for where the water to support 1,750 daily guests will come from or how this will affect drainage patterns and flow. There is also no information presented on how sewage and waste management will be handled near these waterways. These creeks are active year-round and in narrow, precipitous mountain valleys. There appears to be no environmental assessment work performed to date for how the proposed village, valley parking lot or housing will be constructed without affecting the creek beds or wetlands so essential for wildlife habitat and water flow maintenance, especially in the face of climate change. A special concern for Seaton Creek is the large amount of heavy metals from historic mining that is 'trapped' by its wetlands. Changes to water quantity and timing of flow could release these heavy metals into Slocan Lake, affecting fish in the creek and lake. The lodge proposed for the valley between London and Whitewater ridges drains into Kaslo creek, but it is a broad area of significant wetlands and treed, cool refugia for water and wildlife.

Protection of Wildlife Corridors: The Slocan Lake Stewardship Society views the wildlife and ecological communities supported by the watersheds in our area as a keystone to maintaining a sustainable hydrology for water flow and nutrient feed. This proposed Zincton resort/tenure, along with the existing Retallack resort/tenure, the proposed Retallack heliskiing/trail expansion, the existing Stellar heliskiing tenure and the proposed Lyle/Mt. Brennon resort area will result in recreational tenures covering approximately 13,000 hectares between the Goat Range Provincial Park and Kokanee Glacier Provincial Park. This ever-expanding ecosystem pressure will have long term adverse impacts on the ability for this stretch of wilderness to serve as a wildlife corridor and climate change refugia in the Kootenays. SLSS has solicited expert advice and research information from three local, accredited biologist/researchers: a wildlife biologist who specializes in bears and western toads, a biologist specializing in documenting

species at risk (SAR) and wetlands in our area, and a wildlife biologist focused on wildlife connectivity corridors in our area. There is no question, this is a critical corridor for grizzly bears. This proposed development will sever the main North-South Central Selkirk grizzly bear corridor between Goat and Kokanee Ranges (fragmenting them into smaller populations causing genetic isolation), a corridor which includes the nearby Valhalla Wilderness Park. This area also has significant populations of black bear, wolverines, mountain goats, moose and other ungulates. The Western Toad migration route near Bear and Fish Lakes is well-studied and conservation efforts to protect the Western Toad are ongoing. There are numerous species of sensitive and unique vegetation in the subalpine and alpine zones of this wilderness, subalpine fens, valley bottom swamps and marshes. The cumulative effects of year-round human use, access roads, greatly increased road traffic, the planned number of buildings and infrastructure components required along with the development of extensive trail networks and gondolas will have a negative impact on: vegetation (loss of species/decreased vegetation/ wildlife food sources); wildlife population (displacement/fragmentation) and wildlife mortality rates (road kill/human conflicts). None of this has been recognized or addressed in this Expression of Interest.

Economic Sustainability: Taking into account the hydrologic, species and ecosystems covered in this proposal, a wide range of site-specific Environmental Assessments would be required to further understand the appropriate protection and mitigation measures that would be required of such a development and tenure. It is difficult to surmise how this development will be economically viable in either the short term or the long term, the overall approach appears to be dated and exclusive. The SLSS Board is convinced that the Zincton development will be of limited economic benefit to the local communities of New Denver and Silverton. A community values study has shown that Slocan Lake residents highly value healthy ecosystems and biodiversity, wilderness parks and conservation, and support only limited development on crown land. There is already plenty of existing recreational access and established trails into the back country along this Kaslo to New Denver corridor. The Zincton development proposes a 'town' three times the size of New Denver and will only be 10 minutes away. This will place increased pressure on our existing medical facilities, paramedics, volunteer search and rescue, fire protection and roads. It will also decrease the area available for local recreation users - pushing them out of their own backyard, we need to keep the alpine accessible to all.

In summary, SLSS concludes that the Zincton All Season Resort plan should be denied. Our conclusion is based on the direct adverse impact on water quality and wetland refugia and cumulative negative impact on key focal species including grizzly bear, wolverine, mountain goat and western toad in the long term. All the various ecosystems within this sensitive alpine and sub-alpine terrain have high ecological values that are far reaching and go beyond the physical terrain to be developed. The apparent lack of any Environmental Assessments or cultural studies to date (preliminary or otherwise), raises the question as to whether the proponent of this development has the depth of understanding to undertake such an endeavour. In addition, the EOI contains many erroneous environmental and ecosystem assertions, which cause us to seriously questioning the overall credibility of this proposal. We respectfully submit our concerns and are available to discuss further should you require more details.

From: Board of Directors, Slocan Lake Stewardship Society

