

Ryan Durand's email re comments sent to gov. re proposed Zincton All-Seasons Resort
Expression of Interest

May 19, 2020

Proper website address:

<https://www2.gov.bc.ca/gov/content/industry/natural-resource-use/resort-development/proposed-approved-resort-master-plans/list-of-proposed-plans/zincton-all-seasons-resort-expression-of-interest>

Hello Kelly,

I am opposed to this project. Whitewater Canyon is an amazing hiking/camping trail that I use every year. I am not interested in any more private recreation ventures in this area; please keep it public and accessible for all.

In terms of the environmental impact, Whitewater Canyon is a critical grizzly bear area. I have yet to see any actual environmental assessment or impact statements for this project, just a cursory review of provincial data sets that are not comprehensive or up to date for the Kootenay region. The EOI has many inaccuracies regarding the environmental setting and species at risk, such as Section 3.2.3 Aquatic when it indicates that the blue-listed Bull Trout and Westslope Cutthroat Trout are not listed species.

For the wildlife section it is a joke. Mountain goats are found throughout the area, as are number of other listed species such as grizzly, wolverine, etc., all of which are known to be very sensitive to human use and require proper impact assessments.

The vegetation section is largely wrong, and does not describe the location at all. It also does not mention anything about the subalpine and alpine zones, the very places they want to develop, that are the most sensitive. Do not mention the subalpine fens, valley bottom swamps and marshes, etc.

The section 3.2.6 Summary of Existing Environmental Conditions makes incorrect statements, and has obviously not been prepared by a Professional Biologist. There is no way they can do a basic desktop assessment of a massive area and say that "*The proposed area does not contain any at-risk terrestrial species, or any ungulates or ungulate habitat*". It is simply wrong. If the EOI is making such poor assessments like this, I have little faith in the rest of their description.

4.1.1 Opportunities states: "*Limited Environmental Impact There are no environmental values that would prohibit development*" As above this claim is un-substantiated, incorrect, and it is highly unprofessional for them to be making without the involvement of Professional Biologists and on the ground studies.

It is essential that a full assessment is completed if planning for this project continues. This would include detailed site species surveys by biologists of all proposed construction sites and trails over at least one full growing season. If they contact any of the local biologists and researchers in the region, they would already have a much more complete view of what is there, as opposed to relying on provincial data sets.

Beyond the charismatic mega fauna, I have documented a large variety of species at risk in that area, not the least of which is the western toad populations at Bear Lake. To date we have documented over 50 listed species in the adjacent Slocan Watershed (which partially overlaps the proposed project area) to give you an idea of the real diversity

Here are a few local reports, such as the Fish and Wildlife funded study of Western Toads at the Bear Lake: https://slocanswamp.files.wordpress.com/2016/02/western-toad-report_fish-bear-lakes_fwcp_finalmar2016.pdf

Slocan Rare Species Project (outdated with some inaccuracies and status changes): https://slocanswamp.files.wordpress.com/2015/11/13nov2015_swamp_rare_species.pdf

Regarding recreation, the use of digital Apps to assess recreational use in the area is not appropriate, and in no way measures the use of the area by back country users. There is no cell service in most of the area, and tracking apps like those are rarely used in the local community.

Sincerley,
Ryan Durand

Ryan Durand, M.Sc., R.P.Bio.

Crescent Valley, BC