

Village of

RADIUM HOT SPRINGS

British Columbia, Canada

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May 17, 2004

Martyn Glassman, Project Assessment Director
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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.

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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

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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