

## **An expansion of the Summary CONCERNS**

### **(1) Completely inadequate Public notification process and response period.**

the application only came to “limited” public attention on Nov 19<sup>th</sup> 2020 following advertisement in the Boundary Creek Times and subsequent advertisements in the Grand Forks Gazette on Dec 2<sup>nd</sup> and 9<sup>th</sup> as per direction from Government to “advertise in local papers”. Due to late filing of the ads, the comment period was moved from Dec 31<sup>st</sup> to Jan 14<sup>th</sup>.

Although the applicants were given guidance to proceed in Feb 2020, whatever processes the Proponent and/or Government were engaged in, the public only recently received notice.

Furthermore the proponents declined to be interviewed for a story published in the Grand Forks Gazette on Dec 16<sup>th</sup> .

This late season filing, and ridiculously short response period works to prevent adequate public discussion, review and comment. In this season, it is not possible for interested parties and professionals to do the on the ground assessments crucial for a project of this scale.

Government needs to follow our recommendation for a 1 year delay to address the concerns.

The notion put forward by the proponents that “mitigation and diligent use measures” will solve deficiencies during the build-out is not credible. It joins a number of other claims by the Proponents that are not credible.

### **(2) Overlap into Motor Vehicle Closed Area, trashing the intent of that closure.**

This overlap and the Lodge, other accommodations, service buildings, services and more, all being built in the Motor Vehicle Closed area, trashes the intent of the MV closed area. Such closures were made years ago to provide some level of protection from disturbance around the Granby Park, with knowledge that Park boundaries alone do not provide the needed habitat and low disturbance benefits needed by a variety of species, particularly Grizzly and Wolverine.

Check our links to these reports. You will find many more online. The plan can be predicted to have spillover effects into Granby Park where the proponents had initially proposed operation.

The possibility of similar intrusions in the larger Motor Vehicle Closed areas around the top and to the East of Granby Park should be a wakeup call. Our other pages show the possible areas under threat and the larger highly impacted area around the PRL proposal.

**(3) Entire Area in Kettle Granby Grizzly Wildlife Habitat Area, GAR Order 8-373, trashing intent of that designation.** This designation is intended to provide various protections for Grizzly. Notwithstanding applicants claims of seasonal use only, maintenance needs and other servicing and the probability that applicants will seek expanded season use (despite current denials) trashing of the intent of the GAR is inevitable. Map of the Secure Core Area is in later pages along with a link to the GAR Order

### **(4) Massive operation with Ecological Footprint far exceeding the Tenure Footprint.**

Any Environmental Assessment of value, needs to include the Ecological Footprint and related economic and environmental costs.

### **(5) Completely inadequate “armchair” assessment**

As discussed above. That a project of this size and consequence has been brought forward without full “on the ground” assessment is astonishing, but it also appears as though the proponents, in their own words, have planned the project based on google earth views, a couple of helicopter trips and some snow mobile forays. All not nearly adequate. Our own guidance on what is essential in an EIA to follow later.

**(6) Due to application timing and season, no opportunity for interested parties to do the necessary ground assessments.**

Plan rejection or a delay are essential to enable the on the ground review in spring and summer by interested parties and professionals.

**(7) Loss of Habitat in an already fragmented landscape with serious consequences for the threatened Kettle-Granby grizzly and other wildlife.**

by way of effective disturbance resulting in probable displacement of wildlife. See our links to Studies. An abundance of reports, many on grizzly and wolverine that share a commonality. Roads are a problem for these and other species, more roads and trails will increase the problem. The impacts are well documented and ignoring them will continue the trend in which wildlife largely continues to decline. Goat, caribou have been past occupants of this general area. We urge Government to not continue to preside over the demise of more species.

**(8) Accelerated runoff with attendant issues from roads and trails leading to increased flooding risk.**

More roads, trails, tree removal, and a predictable increase in wind-blown, snow press damage will all contribute to the timing, and release of melt water and contribute to factors that result in flooding.

**(9) Many new roads and trails with attendant tree removal proposed in areas in addition to already high existing road network.**

In addition to accelerated runoff mentioned above, terrain is further fragmented with consequences for a variety of wildlife including providing “improved” paths for wolves.

**(10) Highly mechanized operation with noise and air pollution in and out of tenure.**

in addition to heavy machinery needed for logging, trails, building and more, continuing operation using cat-ski machines, snowmobiles, helicopters for supplies and ferrying in clients, diesel generators and likely other gas using snow machines, plus the greenhouse gas impacts of clients flying in from wherever means that this project is not as claimed by the proponents. Namely, a project, “that will have minimal impact on the land and wildlife values” and “ is not sustainable for the long term.” These comments are unsurprising from Proponents who celebrate “the legacy of logging roads (that have been) crucial to the creation of this industry.” and that these roads are “ a great example of how existing forestry roads can all allow for the creation of a new and long term sustainable operation.....”

Anyone concerned about habitat, wildlife and pollution, local and global, (Government ?) must reject the Proponents assertions.

**(11) Concerns as to Government intent to “favour” this application.**

It has been startling to hear that Government might favour this application in view of the tale of “loss” of an earlier tenure as told by the Proponents. “That the Province has been very supportive of the (Proponents) in their pursuit of a replacement cat skiing tenure, as they understand the devastating loss.....”

Whatever risks the Proponents failed to recognize and however incomplete due diligence was for that earlier proposal, is all on the proponents. It is no reason to “favour” this bad plan. Other comment has indicated that Government is ready to “favour” job creation over the environment. There is a long history of that, and the costs to the environment become more obvious every day. Employment, largely of the itinerant, transient kind, should be recognized as nothing that justifies environmental costs.

There are also indications that relevant information from some within Government with knowledge of the risks to wildlife have been excluded from or not invited to comment on this proposal. We expect that the new Minister should be tasked with investigating this and other issues related to policies, practices and legislation governing resource allocations.

We expect to post further on the frequent mantra that “we need to balance, social, economic and environmental issues”. Balance sounds reasonable in this context, except it invariably results in a “big bite” out of the environment with no consideration of cumulative effects and probable future effects.

**(12) Exaggerated economic benefits and no costing of environmental consequences. Irony of proposing high ecological harm, global warming enterprise of a type already recognized as contributing to loss of ski seasons world-wide, amongst other harms.**

**The “Renegade” name is appropriate.**