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Withheld pursuant to/removed as

s.16;s.13

May 1, 2015

Attention: Jesse Lunan, Land Officer
Land Authorizations – Kootenay
BC Ministry of Forests, Lands and Natural Resource Operations

Dear Ms. Lunan,

Re: **Land Tenure Application: Kootenay Heli-Skiing Inc.**

The Kootenay Mountaineering Club would like to make a submission on the application by Kootenay Heli-Ski Inc. for a commercial heli-ski operation near Nelson.

While we are not opposed to heli-skiing in general, or to the idea of a new heli-skiing operation near Nelson, we are concerned that some of the proposed landing sites in this application conflict with backcountry ski area frequently used by our members and others of the skiing public. Also, we are concerned that some of the sites conflict with wilderness values in Kokanee Glacier Provincial Park.

Some of our specific concerns are:

- Some sites in the Arlington and Outlook areas (44, 50, 106, 107, 108, 109, 117, 119) are right on the boundary of the park, adjacent to or near areas which are used by backcountry skiers based at the very popular Kokanee Glacier cabin. Frequent helicopter traffic would significantly detract from the wilderness values of ski touring in the park. Our club has an annual ski week at Kokanee Glacier, and many of our members participate in other ski weeks in the park throughout the winter.
- All of the sites in the West Kokanee Creek drainage conflict with ski runs in an area which is frequently used by Nelson-area residents, who use snowmobiles on the Forest Service road to access ski touring terrain.


We are therefore opposed to this application if it included sites in the areas mentioned above.

Although we appreciate the importance of heli-skiing and other commercial recreation to the economy of the West Kootenays, we ask that the government recognize the importance of non-commercial, non-mechanized, backcountry recreation in the regional economy, as well as its importance to the lifestyle of residents of the area. The West Kootenays are a world-renowned destination for tourists who come here for backcountry skiing, and these visitors are an important part of our economy. This heli-skiing application covers an area which is heavily used by visiting and local skiers because of its easy access from Nelson. We feel that such heli-skiing operations would be better located in more remote areas.

.....2/

We request the opportunity to meet with the proponent and Ministry staff, preferably in a public meeting format. Furthermore, we request that this application be dealt with by Ministry staff in the Nelson or Castlegar offices, as staff in the West Kootenays are more likely to be familiar with land use and recreation issues in the area, and are more accessible to local residents who may wish to offer input.

I will be unavailable from mid-May to mid-July. Should KMC representation or input be needed in my absence, please contact Mr. Ross Bates, Treasurer, KMC at^{s.22}

A handwritten signature in black ink, appearing to read 'D. Clark', written over a horizontal line.

Doug Clark,
President,
Kootenay Mountaineering Club

Phone ^{s.22}

cc- KMC Executive

Lunan, Jessie FLNR:EX

From: s.22
Sent: Sunday, May 3, 2015 10:27 PM
To: Lunan, Jessie FLNR:EX
Subject: Land Act Application by Kootenay Heli-Ski

Regarding: Land Act application by Kootenay Heli- Skiing for a commercial heli-ski tenure near Nelson, BC

I am concerned and opposed to the proposal by Kootenay Heli-skiing. This application will directly conflict with a backcountry ski area frequently used by myself and other members of the skiing public. Also, I am concerned that some of the sites conflict with wilderness values adjacent to Kokanee Glacier Provincial Park.

Some of my concerns are:

- The Arlington and Outlook areas (44, 50, 106, 107, 108, 109, 117, 119) are right on the boundary of the park, adjacent to or near areas which are used by backcountry skiers based out of the very popular Kokanee Glacier cabin. Frequent helicopter traffic would significantly detract from the wilderness values of ski touring in the adjacent park that citizens pay considerable money to experience. I ski in the park, along with other members of the public during annual ski weeks at Kokanee Glacier. The company will be tempted to use prime ski terrain in the Park if conditions within their tenure area are not suitable to ski. We do not want visitors to Kokanee Park to leave complaining about another heli-ski outfit poaching their lines! The Nelson area is a world-renowned destination for tourists who come here for backcountry skiing, and these visitors are an important part of our economy.

This heli-skiing application covers an area which is heavily used by visiting and local skiers because of its easy access from Nelson. All of the sites in the West Kokanee Creek drainage directly conflict with backcountry ski runs frequently used by Nelson-area residents, who use snowmobiles on the Forest Service road to access ski touring terrain. This will lead to completely unnecessary conflicts with heli-skiers and snowmobile assisted skiers. Please do not allow West Kokanee Creek to be tenured out to heli-skiers, this area should be left to snowmobile assisted skiers and those folks touring into the area from Kokanee Glacier Park. There are currently no problems in the area now, and I would like it to remain that way.

I completely appreciate the importance of heliskiing and other commercial recreation to the economy of Nelson and the West Kootenays, I just ask that the government recognize the importance of non-commercial, non-mechanized and mechanized ground access, backcountry recreation to the regional economy, as well as its importance to the lifestyle of residents of Nelson. Leave us space to be who we are. There are already enough heli- this and heli-that operations near Nelson, I see no point in allowing yet another heli-ski tenure to be issued, this will just degrade the experience already offered by other well established operations in the Nelson area.

Lunan, Jessie FLNR:EX

From: s.22
Sent: Friday, May 1, 2015 5:09 PM
To: Lunan, Jessie FLNR:EX
Subject: opposed to heli ski operation near Kokanee Glacier Park

Ms. Jessie Lunan,

I am a long time Kokanee Park user, s.22

s.22 Like many other local people near Nelson I appreciate the mountains in our area. I am opposed to the application by Kootenay Heli-Ski Inc. for a commercial heliski operation near Nelson.

We need to keep the area near the park quiet and relatively undisturbed for the animals who live in the area (they don't know park boundaries) as well as for the people who use the park in winter. The use of mechanized machines such as helicopters would definitely have an impact. I observed how unpleasant ongoing helicopter noise can be in a pristine mountain setting when camping near Assiniboine Park for a week in the summer.

People should be encouraged to use self propelled ski touring rather than fuel consuming helicopters for recreation. Now is the time to do that and say NO to a helicopter skiing operation in the area proposed near Mount Arlington and Outlook Mountain.

Yours truly,
s.22

Lunan, Jessie FLNR:EX

From: s.22
Sent: Friday, May 1, 2015 4:51 PM
To: Lunan, Jessie FLNR:EX
Subject: re.Kootenay Heli Ski inc File #4405571

I am writing to you about the application from Kootenay Valley Helicopters (Kootenay Heli Ski Inc.) for a heli-ski tenure adjacent to Kokanee Glacier Park, File # 4405571.

I have been an avid backcountry skier for many years^{s.22} ski touring weeks, most of which were from backcountry cabins/hut/s lodges in British Columbia.

The Kokanee Glacier cabin is situated in one of the best ski touring terrains in the Province and is used by many groups from Canada and the United States. Its popularity can be verified by checking the large number of applications received by the Alpine Club of Canada for the annual lottery to reserve the cabin for a ski touring week.

I have ski toured previously in areas where there was a heli-ski tenure adjacent to or close by the ski touring tenure boundary. There is no doubt in my mind that constant or frequent noise of helicopters close by spoils the ski touring experience and is in conflict with the undisturbed peace and tranquility of the backcountry sought by many in this rapidly growing activity.

I am not opposed to heli-ski operations in general, but I do not think they should be allowed to operate adjacent to or bordering on very popular ski touring terrain. There is ample terrain in the Nelson area for heli-skiing without the need to encroach the boundaries of Kokanee Provincial Park.

It is ironic that Kootenay Valley helicopters is the company that currently flies visitors into Kokanee Glacier Cabin for an enjoyable ski touring vacation and, if this application is approved, they would then spoil that vacation by flying helicopters in ski terrain adjacent to the most used west side of the Park. I'm sure if this happens people will vent their opinions directly to Kootenay Valley Helicopters on their flight out from Kokanee Park.

I urge you to turn down this application or at the very least not allow heli-ski operations within several drainages from the Park boundary.

Respectfully submitted

s.22

Lunan, Jessie FLNR:EX

From: s.22
Sent: Friday, May 1, 2015 10:57 AM
To: Lunan, Jessie FLNR:EX
Subject: Heli Skiing Application for Kokanee Glacier Provincial Park and West Kootenay area

Dear Ms. Lunan,

You have recently received our Kootenay Mountaineering Club president's letter, outlining the argument opposing the granting of heli-skiing tenure at the park's boundary. I echo his statements, and would add that the general sentiment in Nelson and surrounding towns is against more mechanized development. It is not just the alpine clubs who are vehemently opposed, but the general public as well. Many of these citizens own businesses which benefit from tourist dollars. Those tourists come for silent, pristine, remote, backcountry skiing experiences. When a new heli-ski operation sets up in an area, those owners may benefit, but the town will see precious little of those tourist dollars, as heli-skiers tend to arrive in town and then quickly transfer to the heli-ski lodge, spending their entire vacation, and their money, at that one facility. The negative impact to the established businesses here who have built their livelihoods upon selling the wilderness backcountry experience, will be significant. Any tenure consideration should be restricted to areas which are too remote to be accessed by these existing businesses and the people of the region. New tenure should only be granted in areas where a helicopter is necessary for access.

Thank you very much for your consideration in this matter.

s.22

Lunan, Jessie FLNR:EX

From: s.22
Sent: Friday, May 1, 2015 9:55 AM
To: Lunan, Jessie FLNR:EX
Cc: Dexter, Justin B FLNR:EX; executive@kootenaymountaineering.bc.ca
Subject: Kootenay Heli-Skiing Inc. - Land Tenure Application
Attachments: img-501082534-0001.pdf

Ms. Jesse Lunan,

Attached, is a submission by the Kootenay Mountaineering Club regarding the application by the above for land tenure butting onto the Kokanee Glacier Provincial Park.

The KMC is an outdoors adventure group and has operated for over 50 years in the West Kootenays. We currently have 350 members.

We are opposed to the application for reasons stated in the attached letter.

Thanks,
Doug Clark,
President, KMC

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, March 31, 2015 10:32 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

There's already plenty of heli/cat ski tenures in the area. Public use areas are at a premium. As a snowmobiler and backcountry skier I oppose this.

All though many tenures are considered non exclusive. It seems every time we go into an area of operation we encounter conflict.

When is enough enough. Do the people that live and play in this beautiful region not deserve a place they can go and enjoy without conflict?

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, March 31, 2015 10:16 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

We are already so limited to where we can ride already by the many other cat skiing and help ski operations it would be a shame to loose the area I grew up^{s.22}. If there is anything else I can do please contact me.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, March 31, 2015 8:56 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

We need to stop the division of crown-land among individual tenure agreement what's going to be left for future generations? I know nothings permanent but come on how many operations do we need in the surrounding area? This is getting ridiculous, I guess i'm just going to have to apply myself? The new game of tenure application to keep out other tenure applicants.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, March 31, 2015 6:43 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

This will have a very large, negative, impact the existing snowmobile club grounds which supplies opportunity for back country experiences to many visiting out of towners. People travel from all over North America to come and snowmobile here, which generates income to many businesses within the Nelson area. This proposal reduces back country growth, local economy, and club access.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, March 31, 2015 11:07 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am against this application. As a back country user we have already been squeezed enough in the kootnays. We have Valhalla power cats taking that range and operating well out of their tenure area then snow water operating taking more of our crown land. With even more operators coming in it's putting a strain on relationships between the groups. I use this area in the application exclusively so to stay away from any conflicts Using these drainages for well over 20 years I won't abide by a tenure denying or restricting access.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, March 31, 2015 11:17 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

this is very worrisome that the public access to these areas is being jeopardized. I strongly recommend a very close look at a fair land use legislation.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, March 31, 2015 11:42 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

NO. Just no.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, March 31, 2015 12:05 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

This is a sledding area and should stay as one. Doing other wise will create problems such as pushing riders to ride in parks and clashes with locals who have been using the area for over 20 years. There is already a high concentration of cat/heli skiing operation. There many more areas north of this one that would be way more suitable. Thank you very much for yourtime.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, March 31, 2015 12:17 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

My opinion is that the economic benefits to this project will not outweigh the ecological impact. I do not support this new tenure.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, March 31, 2015 3:04 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Stop this application there is already way to many heli ski opperation s in the area .area is used by many other back country users s.22 . If u have to many heli or cat ski opperation s in a small area no ones makes money . And leads to financial hard ships for every one ,
Stop this before it gets going

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, March 31, 2015 3:33 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Please stop being so greedy. Theres going to be nothing natural left. Greedy generations are going to be the death of our planet.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, March 31, 2015 4:27 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

There are enough tenures in this area already. Leave this area for backcountry users.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Sunday, April 5, 2015 10:53 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

This area has been used for a long time now by ski tourers, hikers and other self propelled outdoor recreationalists who explore the fringes of Kokanee Park. There are increasingly more and more heli ski operations popping up in this province that cater to an extremely small percentage of the population. It does not seem like a fair allocation of public crown land. I do not support another heli ski operation, especially in this location.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Sunday, April 5, 2015 7:13 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571]. this area is already in use by the public?

Snowmobiling for one is for sure

Why make it an exclusive only place for skiing Only (which it will eventually be taken to like all Other heilly ski sites) This land should be for everyone to use Motorized traffic should not be put aside Or it will create an even further need to push out To un used areas

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Sunday, April 5, 2015 9:53 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

The West Kootenay area has extensive commercial ski tenures. There are almost no accessible valleys available for use by recreational ski and snowmobile users. This application infringes on a traditional recreational use area.

As we have seen with almost all other operations as soon as tenure is granted there is conflict between traditional users and the commercial operation. There are many examples of this including operations in the Slocan Valley and the Big Red Cats operation near Rossland.

We certainly do not need another commercial ski operation in the West Kootenays. If this operation is approved please be respectful of local residents and traditional users of this area and ensure that the area remains available for use by recreational sled access ski tours and snowmobiles.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, April 3, 2015 7:23 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

To whom it may concern,

I was very disappointed to hear about Kootenay Heli-Ski Ltd.'s recent heli-ski tenure application (file #4405571) and feel I need to voice my opinion on the matter.

I know that there are many users of this area , including myself, who are equally disappointed that this amazing terrain will now be frequented by heli-skiers.

Thank you for your time and I hope that this tenure is DENIED.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, April 3, 2015 6:42 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

To whom it may concern,

I was very disappointed to hear about Kootenay Heli-Ski Ltd.'s recent heli-ski tenure application (file #4405571) and feel I need to voice my opinion on the matter.

It seems like every square inch of BC backcountry is up for grabs right now. Nowadays, even with a snowmobile, it is hard to find a valley that does not have some sort of tenure attached to it.

As a local sledder and ski tourer, this new tenure lies within many areas that I enjoy recreating in. I know that there are many other users of this area who are equally disappointed that this amazing terrain will now be frequented by heli-skiers.

The Nelson Star reports that this area "will not be exclusive" to this heli-ski operation however, there is something to be said about skiing in an area that does not include the constant pounding sound of a helicopter all day.

Nelson Kootenay Lake executive director, Dianna Ducs, feels that this will be good for Nelson's economy and I don't doubt that it will, but enough is enough. Let's keep some of our amazing recreational areas for those that have a true sense of adventure and not thousands of dollars to be toured around all day.

Thank you for your time and I hope that this tenure is DENIED.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, April 3, 2015 10:31 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

This proposal makes no mention of the fact that Sitkum Creek Watershed is the water source for the Sitkum Creek Water Improvement District. Major disturbances in this watershed have compromised the ability to provide potable water to the community. The statement that human waste will be buried in the snow leads to the logical conclusion that during snow melt that this waste will contaminate Sitkum Creek and create health problems for the users of the Sitkum Creek Improvement District.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 2, 2015 7:56 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

A year ago s.22 and I were planning a backcountry skiing trip, using our sleds for access only. We had some criteria, including to try and go to a zone that was not in a tenure. Looking at the tenure map in BC, we were flabbergasted with how much land is within mechanized or backcountry lodge tenure. Around Nelson, we are surrounded by mechanized tenure, I think this would be the straw that broke the camels back. The zones included in this tenure are treasured zones for sledders, self-propelled backcountry skiers and sled access backcountry skiers (not sled lappers). This small tenure of theirs would be thrashed pretty quickly by the volume of skiers they indicate wanting to have, especially in drier years. What I left for the rest of us?? Should I have to drive 2 hours away from my own home, so rich people from far away access these zones? There already is enough of that already, which I think is great, but NO more!! I decided to move to Nelson because of the great ac!

cess to these areas, I support my community and spend my earnings locally, as do all my friends who use these areas, we are what keep this town vibrant. We are committed to Nelson for the long haul. Yes the tourists bring money, but more money than a local does? I think not!!!!!!!!!!!!!! Please consider all the other passionate users of these areas. I would love to go backcountry skiing and not hear choppers everyday in the Kokanee Range. Please consider the locals!

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 2, 2015 6:40 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

- I am opposed to this tenure
- to high of a percentage of crown land in the kootenays in already covered by tenure.
- there are other tenures already in these areas -these are heavy used recreation areas already, a licinsed operator will result in conflict

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 2, 2015 12:41 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

To whom it may concern

I do not want this application approved. I have been sledding and back country skiing in this area for the last 15 years. There are already 5 cat/ heli operations in the area, we do not need another one. We already are limited in areas that the locals can enjoy the back country .

Sincerely

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 2, 2015 12:25 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

This zone up for tenure is an area that has been used by generations of local Nelson, Kalso & Castlegar residents. It contains at least 2 cabins which are occupied almost all season to families and friends both ski touring and snowmobiling. I would strongly defend those opposing this application and suggest local research be done before making any decisions.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 2, 2015 11:16 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I do not support this application for the following reasons:

The Arrow and Kootenay Lake Districts already have 14 commercial heli ski/snowcat/ski operations locking up Crown Land that I am aware of. What is left for the public to use? All 4 of the proposed areas currently already have high and very high winter public use by back country skiers and snowmobilers. Area 1 is also immediately adjacent to an already existing ski operation.

Flight paths to #3 & #4 are directly over North Shore residences. Early morning noise with flights in and afternoon flights out will be disruptive and will be very annoying to the tax paying public.

Proposed areas 3 and 4 are not viable for a ski operations as the ski slopes are east and south aspects where the sun destroys any snow quality for skiing. They are also Community and Domestic Watersheds. Again-the tax paying public will suffer for the sake of a few dollars to the crown.

I hope the proponent and the government will give some serious thought to what the public has left to use in the back country. We are an unrecognised user group and not considered in such proposals. As an avid backcountry skier, it is getting harder and harder for me to find a place to ski outside of a commercial tenure and I PAY A LOT OF TAXES.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 2, 2015 10:29 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am writing to say that I am AGAINST allowing this commercial tenure application.

s.22 I recreate along the length of the Sitkum-Alpine FSR, at Mount Cornfield and in the West Kokanee area frequently. I am a tax-paying local resident, not a profit-making business, and believe my interests on crown land should be given priority. I live s.22 for a reason. I don't want to go to an area I have frequented for many years, only to find out some one else has been there already, in the name of making money.

The flight paths fly directly over residential areas^{s.22} I am completely against this noise pollution.

Seems pretty ridiculous to have a heli-ski tenure that operates directly along on several boundaries of a provincial park that exists in the alpine! I have read the wildlife management plan and these are areas definitely used frequently by sensitive wildlife (grizzly, wolverine, moose, mountain goat etc) and I strongly believe the helicopter presence is going to affect them in a negative way.

I also believe another operator seems unnecessary, completely overkill in an already over-saturated market of winter backcountry operators in the area. Do they have the support of current operators? Operators who are probably struggling with the current trend of unpredictable and warming trends of winter seasons. Early in their application, Kootenay Heli Ski claims they have seen the need for another commercial heli-ski operator in the Nelson/ West Kootenay area. And that's all they have said! They dont need to justify this in any other way? They give one reason and it is based on a survey conducted by a body organized and dedicated to promoting tourism in the Kootenay-Rockies area. Nevermind that the intentions of this survey seem self-serving, to the needs of this tourism group and its members and supporters, but West Kootenay Heli use this as their only reason? to justify starting this business.

Regardless of the outcome, make sure to inform Kootenay Heli I will still choose to ski tour/ snowmobile in these areas frequently. It is crown land, and I know it is legit for me to go and use these areas. It is why chose to live where I do.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 2, 2015 9:59 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am absolutely opposed to this tenure. s.22

s.22 That said, I am not opposed to the business or anyone applying for a tenure where it would be economically viable or have a non impact on the environment or the recreational area which it is applied for. I am also not writing this to deter a skiing business due to my involvement in the industry.

This proposed tenure would most certainly eat up a good portion of what is left in the immediate area surrounding Nelson. This is an area which is heavily frequented by recreationalists. Take a look at a map and plot out the tenures which have been granted for each operation from Rossland to Meadow Creek. Now take a look at accessibility to what crown land is left for the public to enjoy without infringing on a tenure. There is not a lot left. We NEED terrain to access which is close to town. The commute to get to these areas is already time consuming when you consider the distance from the highway to skiable terrain, via logging road. Access to these areas is anywhere from 20-40km of highway driving from town which is a reasonable commute. Then 12-15km of logging road. Then skinning to your desired line. I realize, the size of this tenure is not a big one. This is not the issue. The fact that it is a small tenure is makes it even more concerning. Ski terrain will be eaten up quickly, especially in a year of low snow like we had this year. This means less available skiing for the non paying public.

There is a whole other environmental issue to consider. I am not a biologist but I do know that stacking tenure upon tenure can not be a good thing from an environmental standpoint.

Numerous operations have been granted in the past. I have never been opposed to these applications or expressed concern over these. I have reviewed them and have been fine with what I had seen. This tenure application is a whole other issue.

PLEASE,PLEASE,PLEASE

DO NOT GRANT THIS TENURE.

The Kootenays need this area free of operation. There are enough operations within this community. You cannot possibly sell me the "Economic Impact" being worth the granting of this Tenure. This is a joke.

Please do your homework. Read the responses, consider each and every one of them, and make a wise decision.

Respectfully,

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 1, 2015 11:24 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Multiple user groups trying to access the same terrain has already created animosity in this region. There are so many other mechanized skiing tenures in the region already. I do not support this project, as the drainages that are intended to be used for the project are some of the closest drainages to Nelson which are accessed by countless recreationalists year round. I do hope that the proprietors of this project look elsewhere where the impact on local users who wont be the ones paying 1000 dollars a day to go heli skiing will not be as extreme.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 1, 2015 11:24 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

This area is used by snowmobiles for recreation and will lead to conflict if application is approved. Thank you.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 1, 2015 8:35 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

The proposed area is already a heavily used area by many different groups. There is not room for 1300 skiers! The environmental and the community impact would be HUGE. This application should not even be considered.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, April 7, 2015 9:24 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I work locally s.22 and backcountry enthusiast. I cannot think of me places that are not being used for the purposes of heli-skiing or cat skiing anymore. maybe it's time we should look at curbing this type of recreation at this point. I am a big proponent of ski touring as it has a very low impact on the environment. more carbon being pumped into the atmosphere from heli-skiing is the last thing I think we need at this point. I'm also confident that if you look deep inside at what you really believe you would believe the same.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, April 7, 2015 12:10 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

As a back country user the area proposed may impact areas that we use for snowmobiling and sled skiing throughout the winter. There are numerous active tenures in the West Kootenay area which the snowmobiling community must restrict use in while they are in operation as it is. Adding another tenure and further restrictions reduces available "public" space to use for winter recreation as many areas are not accessible.

The area of Sitkum Creek, Lemon Creek and Crusader Creek is very important to the local snowmobile clubs and additional for profit businesses impact the public land use of those areas and should not be given priority over its use.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 6, 2015 10:39 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

PLEASE consider the impacts of allowing another mechanized ski operation into this area. This area is a prime location for non mechanized ski touring for many. As well, with it bordering Kokanee Prov. Park, I feel that the constant noise from multiple helicopters throughout the winter may scare off wildlife and have an impact on park users in general. THIS application will also have a detrimental impact on other ski operations in the area that are finding it difficult to compete with difficult winters (i.e. warm / dry) and with other operations. PLEASE say NO to this application.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 6, 2015 9:15 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Object to operations in Sitkum and West Kockanee drainages. I am a recreational back country skier with the intension to ski these slopes in the coming years. I assess the areas by snowmobile. Some areas need to left for the general public. Sitkum C is a community watershed. The increase in numbers of people defecating in the watershed will increase the risk of contamination of the water supply.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 6, 2015 8:08 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Re application for kootenay heliskiing.

The proposed area of redfish drainage and sitkum creek drainage has already a large numbers of avid snomobiler accessing the area all winter. there are fewer and fewer area accessible to snowmobilers. The area is also frequented by back country skiers. Heliskier doe not usually appreciate the noise. This area is also very close to Kaslo, Balfour and NELSON, all recreate in that area.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 6, 2015 8:06 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

This small park and the surrounding crown land is already significantly pressured on all sides by other various groups (by that I mean previously existing cat skiing and heli-skiing).

The noise of a daily heli-ski operation will be noticed by residents on all sides of this park, both rural and urban. The solitude is part of the reason that many people have chosen to live in the West Kootenay's.

I am a user of a large part of the backcountry area proposed in this tenure application. I am a backcountry skier and frequently use a sled to gain access to ski touring terrain. There is already precedent with existing operators to not allow, or highly discourage, sled access through their tenure. Crown land should be for the use of all people.

I do not support this tenure application.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 6, 2015 6:32 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

After reviewing the proposal I noted that one of the flight paths is through the Kokanee Creek Gorge. I am currently
s.22 and it may hinder the flight path for the hell ski
operator. It just should be noted his elevations he has assessed for accessing the area during the winter may have to be
adjusted. s.22 and will share the details with the operator once
it is received.

Please feel free to contact myself a s.22 for further info.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 6, 2015 4:05 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

This proposal is an outrage! There are way too many backcountry enthusiasts that use this area to give another tenure to some heli ski outfit. I'm sure you have received multiple comments on this subject and I'm sure that I speak for many people when I say that, I will do everything in my power to NOT let this happen. There is an ever shrinking amount of public accessed terrain and there has to be a line drawn in the snow!!

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 6, 2015 2:34 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

No no no no thank you! There are plenty of machine operations in this area. Enough. Let's keep some of our last few remaining peaceful places in the Kootenays for people-powered activity, like ski touring and hiking.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 13, 2015 2:36 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Would be a huge disappointment to see this area closed for Skiing.....sledders are slowly be pushed aside, so sad!

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 13, 2015 10:25 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I live and work s.22 between Kokanee and Redfish drainages, we already have a great deal of Heli traffic overhead and don't need more. I also spend a great deal of time in the Redfish both summer and winter. It is in one the few areas left that is not utilized by commercial operations and should stay that way. it is relatively easy access for us where there is plenty of harder to access areas that are better suited for commercial operations. Their are many local residents that cherish these areas and many people that visit the area to access these areas on their own efforts. Their are very few gains by approving this tenure other then profits for the owner operator, while many people will be negatively impacted by it. As well their are plenty of mechanized ski operations in this immediate area already and there is only so much business to go around. Bringing in another will dilute the market, slow down exiting operations and potentially negatively effect!

employment. I also am aware of the applicants existing strategy to gain business for his Heli business which is to temporally offer reduced rates in hopes of gaining new clients from established Heli operators. My guess is he will do the same trying to get his Heli ski business going which will have further negative effects on existing business and is unsustainable for his.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Sunday, April 12, 2015 10:00 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

s.22 near the northern boundary of this proposed venture. The area already had tenure holders of Retallack and Carlisle lodges. We use the Silverton, and Enterprise Creek frequently for backcountry skiing. This area is unique as it does not have the helicopter noise and activity of the areas around Nakusp and Trout Lake which are heavily used by CMH. I would encourage that their activities be limited to drainages not frequented by other backcountry users. Please keep me updated as to the progress of this application by email. if you require more information or details please let me know

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, April 14, 2015 3:15 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571]. I chose to live in the country for peace and quiet. It's getting noisy as the city of Nelson has little land for expansion so the pressure is getting more as people are buying up more rural property around us ...

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, April 14, 2015 4:41 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

In a nutshell, 'Not In My Backyard'!

I do not agree with this application to have heli skiing in my back yard. s.22
helicopters would, more likely than not, s.22

The access for the
I am living in the country

for the reason of peace and quiet, not to have mechanical vehicles in my hearing space.

I also speak for the wildlife that would like to also be left alone. The elk, grizzly, black bear, cougars, coyotes, deer, and wolves, (to name just a few) also would like to keep their peace and quiet. They do not want any more (noisy) humans in their back yard either.

I also do not need any further contamination of my water shed. We already have issues with our surface water source, and more access will only exasperate it.

So, please, no heli skiing in my backyard.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 20, 2015 8:59 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I think this is a terrible idea and should not be allowed to go through. The areas surrounding this tenure are used heavily for ski touring, and self propelled activities. Operating helicopters every day, day in and day out for the duration of the winter only serve to compromise the joys of being in this part of the world unobstructed. Please consider denying this request for the commercial application.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 23, 2015 9:38 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I feel we do not need another hell ski operation in that area. Our backcountry (Public Land) is already over run with commercial operations. Also, I work in the ski industry, and the market does not need another operation. Please decline their proposal.

Thank you.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 23, 2015 9:20 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I feel enough tenures have been given out for mechanized back country ski touring in BC. Please create back country ski parks instead. I am against this.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 23, 2015 12:45 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Please decline this application. This tenure application encompasses areas of high use by organized snowmobile groups, as well as countless locals pursuing the wilderness recreation opportunities during their free time.

A Heli Skiing operation would introduce overhead avalanche hazards to ski touring groups below - on access roads and natural opens in the forest.

The proximity to the Provincial Park would erode the integrity of this natural landscape.

Garbage...all Heli Skiing operations create pollution. The most obvious is the black landing zone stakes which are driven into the snow at the upper and lower extents of their "runs". After several years of operation the amount of discarded stakes is substantial.

regards

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 23, 2015 6:23 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

April 23, 2015

Dear Crown Land Allocation review committee,

Re: File: #4405571

My friend, s.22 brought this application to my attention and solicited my comment. Although I am from s.22 I do typically visit the Nelson area twice a year during the Winter months for skiing. In addition to skiing at Whitewater, I've cat skied at Baldface, Selkirk Wilderness and White Grizzly, heli-skied with CMH and have been to the Kokanee Glacier Cabin on multiple occasions. I love Nelson, it's restaurants and shops.

I appreciate all the opportunities and joy mechanized skiing has brought me over the years, but have definitely shifted my focus to backcountry touring. I've come to appreciate the serenity, quiet and focus on enjoying where you're at, rather than how much vertical you've got or are going to get. Now, the impetus for my trips to the Nelson area is exclusively for touring trips and I appreciate the resources the Nelson area provides for these trips. I would hate to see these resources compromised in the way the pending application proposes.

Sincerely,
s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 23, 2015 12:15 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

To Whom it May Concern,

I am writing to express opposition to the application that Kootenay Heli-Ski Inc. (KHSI) has submitted for a new heli-skiing tenure on the crown land which surrounds Kokanee Glacier Provincial Park. Here are my concerns:

The tenure areas which KHSI has applied for overlap with areas that are regularly used by locals for backcountry ski-touring and snowmobiling. Conflict with local users will arise as heli-skiing uses up more terrain in shorter time than ski-touring does. This will destroy the quality of experience for local ski-tourers who work much harder to get to these same places. This will essentially displace them from their 'backyard', allowing only the elite to have access instead.

>If given approval, KHSI will cut large cleared areas as 'landing' and 'pick-up' zones in the sensitive forest environments which border Kokanee Park. These areas should be left as 'buffer zones' for wildlife such as wolverines to roam.

>The constant noise of heli-skiing flying around the park perimeter will drastically decrease the quality of experience for guests coming to the Kokanee Glacier Cabin; Nelson's world renowned 'Alpine Club of Canada' ski-touring destination

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 22, 2015 10:50 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Please, no more heli skiing operations in the Kootenays.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 22, 2015 10:54 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

4-22-2015

Re: Application

Client: Kootenay Heli-Ski Inc.

Purpose: COMMERCIAL RECREATION/HELI SKI

Region: Kootenay, Cranbrook

Agency: Crown Land Allocation

File: #4405571

Mar 11, 2015

Hi,

I have just returned from Kokanee Glacier Hut s.22

such an experience. s.22

my observations are:

This area does not need multiple daily flights from Nelson to backcountry and adjacent to Kokanee Glacier. The other and better/more preferred style is AT skiing in which skiers "skin" up to a safe point where they then remove the skins and lock in their boots to the skis and ski down in the alpine downhill mode. The skiing we experienced last week was very desirable powder snow. Heli skiing will adversely affect this AT skiing because the Heli skiers will simply drop onto the desired peaks before the AT skiers get up the hill and take lots of the powder skiing terrain. And because Heli skiers will be able to get in more runs (heli assisted) the negative becomes even worse. Guaranteed this would happen. Most importantly this area is already void of heli skiing. Don't allow most of BC to go to heli skiing. Save some for human powered sports, as it is now.

So for good clean winter fun AT skiing is the way to go versus heli skiing in this area of Kootenay. So if the Manager of Crown lands in BC is interested in allowing (and you should be) for environmentally friendly and safe winter recreation that also adds huge local to Nelson economic impact then AT skiing is the best choice. AT skiing is becoming huge and people are coming to Nelson and the glacier as we did.

Suggestions for people working on this application are to engage the local Nelson nordic group leaders and get their insights. Perhaps a community meeting would be helpful to discuss the application. But the application should be denied as it would change the Kokanee Glacier area to the detriment of a better use and current use.

Regards,

s.22

Unbelievable is
So seeing this for the first time

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, April 24, 2015 2:29 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

s.22 and would be negatively effected by the noise by the helicopters.
Please do not allow this to go through.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, April 24, 2015 1:34 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

This sets a new precedent for ubiquitous and constant helicopter traffic and noise leaving and returning to a city center.

This application should be refused on the basis that the helicopter flights will present serious, sustained noise disturbance on a larger population of people.

Helicopter skiing belongs in the backcountry far from human populations.

Please refuse this application

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, April 24, 2015 11:34 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Not cool. Leave this for the people that live and play here.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, April 24, 2015 5:41 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

My comment on the Kootenay Heli-ski Inc. is that the Mt. Cornfield tenure is too close to residential areas to endure the amount of helicopter traffic that would be required in the winter. We already have too much helicopter activity in the valley and this operation would make it practically non-stop all winter.

The Sitkum drainage is a popular ski mountaineering destination and is used by many locals. The company's application for tenure in the Crusader/Springer Cr. area would seem to interfere with the long-time use by the Nelson Sno-Goers snowmobile club which has a cabin and a popular riding area in the Crusader Cr. area.

With the occupation of tenured land in nearly every drainage around Nelson already, I don't feel the local public would be well served by the issuance of yet another obtrusive enterprise. Leave a few areas for the ski tourers and the animals not to be bothered by low-flying helicopters. We don't need or desire the extra air traffic on the ridges overlooking our residences.

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, April 24, 2015 5:07 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

s.22 I am opposed to this application, with concern to constant airtraffic noise disturbance in the winter. Thank you.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, April 24, 2015 4:38 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am opposed to the application for the proposed heli-skiing operation here. It would result in a huge increase in helicopter noise in the area throughout the winter months and as a sensitive forest environment with many different types of wildlife, should be maintained as an undisturbed wildlife corridor.

s.22

From: do-not-reply@arfd.bc.ca
Sent: Sunday, April 26, 2015 7:55 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I feel this application for the crusader and redfish areas will cause negative and possibly unsafe interactions with the current users of these areas.

I also frequent the red fish area for snowmobiling where the trail is also maintained for snowmobiling. Every time I have gone up redfish I have met groups of sled skiers heading up into the heart of the tenure application area.

As locals who live and spend their money in this area all year round, vs the few that may spend money when they come to ski, are slowly loosing our recreation areas to commercial operations. This area already has the most commercial backcountry tenures as it is. This needs to stop.

Thank you for the opportunity to voice my concerns.

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Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Sunday, April 26, 2015 6:26 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

As a group of avid back-country users, we want to strongly object to Kootenay Heli-Ski plans to operate near Kokanee Glacier Park. The size and location of the planned site is very inappropriate. It is too small an area to avoid the noise of constant Helicopter- Traffic. Residents of Nelson and those ski-touring in the area will be adversely affected in a significant way. We can say good-bye to peace and quiet in our beautiful back-country.

there are also adverse environmental considerations in their plan. Please reconsider your decision.

Thank you for hearing our concerns

Respectfully

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Sunday, April 26, 2015 11:34 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I do not agree with allowing this tenure. Although hellisking brings revenue to the area I believe there are only a few places left for ski touring and there are already quite a few hellisking operations in the area.

Thank you
s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Sunday, April 26, 2015 7:52 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am against a Heli Ski operation so close to the town of Nelson BC . It is not the most environmentally friendly ski operation . Not only does the loud noise the Helicopters make have a negative impact on the residents of Nelson ,but also the sight of Helicopters flying in and out of Nelson on a continuous basis has a negative visual impact to the residents of Nelson and surrounding areas.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Saturday, April 25, 2015 4:30 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I strongly oppose this heli-ski proposal for crown land surrounding Kokanee Glacier Provincial Park, for the following reasons:

1. Noise - For residents^{s.22} the helicopter noise will adversely affect the outdoor experience of walking, snowshoeing and cross-country skiing. This is especially critical for guests at the Kokanee Glacier Cabin, which is full with guests all winter. Additionally, helicopter noise in town will be increased.

2. The tenure areas applied for are already used by locals for backcountry ski-touring, snowshoeing, and snowmobiling.

3. I'm concerned that land clearing for landing and zones will alter wildlife zones, reducing wolverine, elk, deer and bear territory.

4. Another fuel-dependent business bringing noise and air pollution is not what this (or any) area needs.

I have no mitigation suggestions because of the proposed location of this venture.

Climate science indicates a short-lived ski industry, even for these alpine areas.

Thank you,
s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Saturday, April 25, 2015 12:42 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

As a backcountry skier using automobile and my own power to access terrain 90% of my ski / split board days since s.22 I oppose this proposal. Don't we have enough hell-ski and cat-ski terrain in BC already? This seems too close to Kokanee Glacier Park, too.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Saturday, April 25, 2015 12:31 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Hello,

I deeply oppose the from KHS proposed new Heli-ski business in the area of Kootenay and Slocan lakes. The negative impact on the existing wildlife will be immense, adding threat to the already multi-use of the area by snow mobilers. There are existing ski enterprises all over BC and there is no need for more. I urge the government not to allow more ski businesses. Instead I hope and request to protect the few areas where wildlife still has a winter refuge.

Sincerely

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Saturday, April 25, 2015 12:30 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Hello,
I deeply oppose the from KHS proposed new Heli-ski business in the area of Kootenay and Slocan lakes. The negative impact on the existing wildlife will be immense, adding threat to the already multi-use of the area by snow mobilers. There are existing ski enterprises all over BC and there is no need for more. I urge the government not to allow more ski businesses. Instead I hope and request to protect the few areas where wildlife still has a winter refuge.

Sincerely

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Saturday, April 25, 2015 10:58 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

The areas proposed by KHS are close enough to major centers/highways that 1: helicopter traffic and noise over residential areas is going to be a nuisance. s.22 and already right now there is plenty of helicopter noise servicing the Snow water lodge in the Bonnington and the Boldface lodge across the valley. Helicopter traffic servicing the proposed areas radiating from Nelson airport would criss cross over the same air space.

2: they will be impinging on some of the few areas that are accessible to those of us that practice back country skiing/ski mountaineering. I moved to Nelson so I could practice this sport. Not many areas are accessible directly from the road, but they are accessible with a reasonably short approach by snow mobile. Helicopter companies see private self powered skiers as competition. Too many areas in my back yard are tenured and I have been harassed more than once already in the Bonnington range for skiing "their terrain" s.22

Must every square foot of soil be commercial? Can we have a little bit that we can all wander into and enjoy?

3: I do use commercial operations, ski lodges that cater to self powered skiers in particular. When i am up into one of these after the initial helicopter trip to get there I enjoy a back country experience, the constant raucus associated with heli skiing operations detracts gravely from the experience, I simply never go back to a ski lodge where I am bothered by helicopter noise all week long. Seem to me Mt. Carlyle lodge is at risk to have its soundscape damaged if KHS runs a heli skiing operation to its South Long mountain mt. Heyland

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Saturday, April 25, 2015 9:36 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I live in this watershed area and do not wish to have the noise pollution this will cause. Please keep this away from us

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, April 24, 2015 10:23 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I oppose this heli-ski area application based on the location around Kokanee park where I and many friends like to ski tour. There are already too many heli-ski operations in this area, meaning more noise pollution and use of this wilderness as playgrounds for the rich.

A ski-touring lodge would be more appropriate.

Thank you.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 23, 2015 12:23 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Recreational helicopter use is irresponsible use of fossil fuels, creates un-wanted noise that disrupts wildlife, benefits only the extremely wealthy. I strongly oppose additional permitting of recreational heli ops.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 22, 2015 8:12 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Not in favour of another heli ski operation. As this year has shown. We already don't have the carrying capacity to keep all of the current operations busy. Self propelled sport is one of Nelson's greatest assets. Let's have less helicopters flying over our residential areas.(there are enough in the summer) Thank you.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 22, 2015 8:02 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I oppose this application for tenure. The increase in regular traffic from the Nelson Airport and the restriction is access for public in an area that is very important today to local users are the two main reasons for opposition.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 22, 2015 6:20 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

A Heli Ski guiding operation so close to a Provincial park and small town may seem like a good idea in concept, however rest assured that it is not.

The extreme increase in disturbance both to wildlife, community residents and air traffic would be significant.

I grew up in Nelson s.22 and can say first hand the the charm and attraction of Nelson would be greatly reduced if there were to be increased helicopter traffic on a daily basis, as there is around Revelstoke as a heli ski mecca.

Please DO NOT allow this area to be used for Heli Ski guiding as it would seriously degrade the charm and relaxed atmosphere that IS Nelson and area.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 22, 2015 10:05 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I do not think we need another heli / snow cat operation squeezing us out of our quiet public spaces where we enjoy the mountains without noise pollution

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 22, 2015 9:26 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Bad idea! The backcountry surrounding Kokanee Provincial Park is a lovely place for local residents to spend winter days enjoying the outdoors. Adding another commercial operation to mix limits the terrain that we are able access. As a longtime local ski tourer, I strongly oppose this application.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 22, 2015 10:09 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

We don't need more of these kinds of ski operations in this area. Please keep the crown land as just that.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 22, 2015 10:39 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I completely disagree with this.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 27, 2015 9:16 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

If we all want to keep enjoying snow sports, the last thing our climate needs is to cut down trees and fly frequent fuelling, extremely loud and obnoxiously noisy helicopters that contribute to the climate change disabling the snow. Stop the craziness!

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 27, 2015 9:21 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I do not support Kootaney Heli-Ski Inc.'s application for tenure associated with a heli ski operation as submitted. As a resident of Nelson I do not support an increase in heli activities based out of the Nelson Airport, or the private helipad located just out of town, as it has a big impact on Nelson with respect to noise pollution. Additionally, I do not support an increase in mechanized access to the backcountry in the area surrounding Kokanee Park, as it will disturb wildlife in the area. Cutting of new landing areas and/or runs will also alter the landscape in potentially adverse ways for wildlife. The viewscape from an internationally famous park will also be disturbed, to say nothing for clients at the cabin disturbed by helicopters during an otherwise pristine backcountry experience.

Sincerley,
s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 27, 2015 11:19 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

My name is Thomas Newell and I am the Regional Director for RDCK Area F. This proposed operation will operate within Area F. Specifically, the operation proposes to operate, in part, in the Duhamel and Sitcum watersheds. Hundreds of Area F residents live within these watersheds. They draw their water from within these watersheds and reside within the range of this proposed operation. For me, what is missing from this application are four crucial aspects:

1. Prior to any formal approval (or disapproval) there is no formal PUBLIC meeting including the Proponents, the approving Ministerial people and the Regional District during which more information would be provided and feedback could be heard and seriously considered as part of the approval process.
2. Details of the potential impacts on the water that the residents use.
3. Defined routes and times that the helicopters will use and what the citizens can expect vis a vis the noise pollution impact (which is referred to in the proposal document).
4. Other considerations and concerns that residents and other citizens have, that may not be raised without a full public meeting process.

This operation will affect residents and their collective voice is not being heard through this process. For these process reasons I cannot support the project proposal.

Sincerely Thomas Newell Director RDCK Area F.

Thomas Newell
TNewell@rdck.bc.ca

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Withheld pursuant to/removed as

DUPLICATE

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 27, 2015 1:14 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Please do NOT allow this operation.s.22 I don't
want to hear Helicopters all the time near my home. I also think Heliskiing is an incredible waste of fossil fuels, and only
made for the elite.
Thank you.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 27, 2015 8:27 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am completely opposed to this application. This area is too close to areas heavily frequented by self-propelled skiers. It is also too close to one of the premier provincial parks in the province where wildlife and recreational users should have a reasonable expectation of a peaceful backcountry experience free of the noise and sight of helicopters.

s.22

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 27, 2015 8:44 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am writing to oppose the application of Kootenay Heli-Ski Inc. for a new heli-skiing tenure on the crown land that surrounds Kokanee Glacier Provincial Park.

I have been visiting many parts of the proposed tenure area in the winter for recreation for many years, including snowmobiling and backcountry snowboarding. To allow a heli-ski operation in the area will take away some of the best places to enjoy winter sports for me and many other locals. The noise associated with the proposed operation will also negatively affect the nature-based backcountry experience that I am seeking.

Helicopters are extremely loud and obnoxiously noisy. Even when I am not in the backcountry, it will still be extremely unpleasant to be forced to endure an unacceptable increase in associated helicopter noise all winter long if Kootenay Heli-Ski Inc. is permitted to operate.

The proposal will also need large tree-free cleared areas both on summits, ridgelines, and in valley bottoms to act as helicopter landing and pick-up zones in the very sensitive environments which are immediately adjacent to Kokanee Glacier Provincial Park. These areas which border the park should be left as buffer zones for sensitive wildlife species such as wolverine to roam. The associated noise will also greatly impact the overall experience of the people who ski-tour at the nearby Kokanee Glacier Cabin. After spending seven days in the cabin this past winter, I truly appreciate the reason why this area is and should remain protected. Unfortunately, wildlife and noise do not recognize boundaries and proposals such as this could jeopardize one the most amazing places in the world.

s.22

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 27, 2015 9:25 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am writing in opposition to the application for a new heli-skiing operation north of Nelson, BC proposed by Kootenay Heli-Ski Inc. (MFLNRO File#4405571).

The assertion that Kootenay Heli-Skiing's proposed ski areas have minimal public use is false. Nearly all of the proposed heli-ski terrain is within or adjacent to areas used throughout the winter by the public. The Redfish, Crusader, Outlook, West Kokanee areas are all regularly used by snowmobilers and backcountry skiers. Most importantly, the proposed tenure surrounds Kokanee Glacier Provincial Park. Allowing heavy use by heli-skiing in the area immediately adjacent to one of the most iconic wilderness areas in the Kootenays and the province is not in the best interest of British Columbians. The proposed heli-skiing would be extremely disruptive to all other people recreating in the area, and conflicts are inevitable.

As indicated by the Wildlife Impact Assessment, the proposed tenure contains important habitat for a long list of threatened species. In particular, impacts on Mountain Goats and Wolverine are likely, because important winter habitats occur within the proposed heli-ski areas, and these species are known to be sensitive to disturbance by helicopters. The management plan includes provisions to attempt to minimize wildlife impacts but these small changes do not adequately mitigate the impacts to wildlife in the area. Helicopter flights eight hours per day throughout the winter will have adverse effects on wildlife in these areas regardless of the best management practices followed. In addition, the wildlife impact assessment did not consider the cumulative impact of the many mechanized skiing operations in the region. The incremental impacts to wildlife by an additional helicopter operation surrounding a protected park area are likely greater than presented in the assessment.

Mechanized skiing is an important tourism industry in British Columbia, especially in the Kootenay region. However, an additional heli-ski operation in an area already saturated with mechanized skiing operations is unnecessary and unfair to other resource users. Approval of a heli-ski operation immediately adjacent to Kokanee Glacier park would significantly erode the wilderness values of this iconic park, and likely have adverse impacts on wildlife in this buffer zone to an important protected area. For these reasons, I urge you to reject the current application by Kootenay Heli-Skiing and any similar future proposals for the area immediately surrounding Kokanee Glacier Provincial Park.

Sincerely,

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, April 27, 2015 9:33 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Please consider the noise pollution and impact on areas that are currently used for backcountry skiing. A day of backcountry skiing is heavily devalued by helicopter noise and proximity. Being so close to Kokanee Glacier Cabin is also an issue that should be carefully evaluated for the reasons listed above.

Thanks.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, April 28, 2015 10:27 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

The application for a heli-skiing operation in the Duhamel watershed has recently been brought to my attention. I have looked at the application document and have strong concerns about the noise pollution implications for those of us living immediately below the proposed helicopter flight paths. This is a fairly densely populated area. I expect that many area residents have, like myself, chosen to live here because of the peaceful environment. s.22

s.22 I am extremely disappointed by the prospect of having to put up with the noise of multiple helicopters passing overhead for several months of the year.

I am in agreement with the process concerns raised by Area F RDCK Director, Thomas Newell.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, April 28, 2015 11:32 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

s.22 I am a regular visitor to this area of B.C., having both friends and relatives living in the vicinity of Nelson and Six Mile. It is wonderful to be able to get up into the old growth forest, - the silence, flora, fauna and fresh air a treasure which is beyond words in expressing the importance of its preservation. Last summer with all the forest fires, I experienced the exhausting helicopter traffic. Obviously there are many important and necessary uses for helicopter traffic. Even their use for heli-skiing is not so objectionable when the areas are in remote tenures. However, it would be disturbing to have a heli-ski venture going on in the Kokanee Glacier area so near to town residences and the park.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, April 28, 2015 11:49 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Re. Duhamel watershed heli-ski operation proposal:

As a resident below the proposed flight path I have strong concerns about noise pollution implications. Though the neighbourhood is fairly densely populated, it is quiet. This is why I and many others live here. Imposing the sound of multiple helicopters overhead several months of the year on so many residents is not responsible community planning. I strongly urge you not to allow this proposal to pass.

Most sincerely,

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, April 28, 2015 12:47 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I oppose this heli-ski proposal because of its proximity to Kootenay Park. The Park is well-known for its self-propelled backcountry skiing opportunities... let's leave it and the surrounding area free of choppers!

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, April 28, 2015 1:43 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I have had the good fortune to spend a week at the Kokanee Glacier Cabin. We ski toured, and were hypnotized by the wilderness beauty and the quiet solitude. There are so few places like that left on the planet please don't let that happen to the park. Save it for the people who live close by and the many visitors who come from all over the world.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, April 28, 2015 5:05 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Hi there,

My views on this application are that it will be detrimental to the character and spirit of the area, which Nelson has so deftly marketed and built a tourism industry upon.

If this application were filling a gap in the supply of mechanized operations in the West Kootenays I would be much more inclined to support it, however, with half a dozen operations within a short drive from Nelson that is simply not the case. Especially considering what happens when a winter is slower than average such as this year. As it stands.
s.22 area has a nice balance of operations that are able to thrive. To add another would be in effect adding another horse to the trough.

I understand the economic draw and benefits industry such as this brings, however such industries must also be governed to ensure they are not over prescribed or overdone. Would BCTS approve a cut lock on the face of Elephant Mountain? Or tear down a heritage building to build another coffee shop??

It's great to be known for something. Nelson is know. For its diversity and culture. Let's look to other ways to encourage more economic growth that won't erode said diversity.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, April 28, 2015 5:09 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

The application for a heli-skiing operation in the Duhamel watershed has recently been brought to my attention. I have looked at the application document and have strong concerns about the noise pollution implications for those of us living immediately below the proposed helicopter flight paths. This is a fairly densely populated area. I expect that many area residents have, like myself, chosen to live here because of the peaceful environment. s.22

s.22 I am extremely disappointed by the prospect of having to put up with the noise of multiple helicopters passing overhead for several months of the year.

I am in agreement with the process concerns raised by Area F RDCK Director, Thomas Newell

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, April 28, 2015 6:57 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I would like to express my disapproval for this proposed heli ski operation. I'm a s.22 Nelson local, as well as an avid outdoors enthusiast. I feel this would be a negative addition to the proposed backcountry area as well as surrounding areas. The economic benefits aren't enough to outweigh the increased noise/traffic in the area. I have talked with many folks and the vast majority don't approve of this project. I'm sure many won't write, but know theres a large group of locals opposed to this. Thanks s.22

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, April 28, 2015 7:46 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

This helicopter ski operation is not wanted. It is too close to Kokanee Park which our family visits multiple times each year. Nelson airport helicopter traffic is also a huge noise pollutant anytime of year.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, April 28, 2015 8:53 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

To whom it may concern, I was very disappointed to hear about Kootenay Heli-Ski Ltd.'s recent heli-ski tenure application (le #4405571) and feel I need to voice my opinion on the matter. It seems like every square inch of BC backcountry is up for grabs right now. Nowadays, even with a snowmobile, it is hard to find a valley that does not have some sort of tenure attached to it. As a local sledder and ski tourer, this new tenure lies within many areas that I enjoy recreating in. I know that there are many other users of this area who are equally disappointed that this amazing terrain will now be frequented by heli-skiers. The Nelson Star reports that this area "will not be exclusive" to this heli-ski operation however, there is something to be said about skiing in an area that does not include the constant pounding sound of a helicopter all day. Also as a resident of Nelson, during a busy helicopter flying season (forest fires season) the constant sound of !

helicopters flying above town can be quite disturbing and with this proposal it would be ongoing all winter long. s.22 feels that this will be good for Nelson's economy and I don't doubt that it will, but enough is enough. Let's keep some of our amazing recreational areas for those that have a true sense of adventure and not thousands of dollars to be toured around all day. Thank you for your time and I hope that this tenure is DENIED.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 29, 2015 7:18 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Please be aware that we are already dealing with excessive helicopter traffic from this airport, they fly right over our house coming and going from the airport all summer and winter, s.22

s.22 and this small airport is getting crazy with air traffic. please take our concerns into consideration, it would be better if they located out of a regional airport.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 29, 2015 8:10 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

With response to this application, I am opposed to this tenure. I can respect and understand the need KVH has to operate their machine's through the winter but the area in which they will operate has been enjoyed by local access for a long time. As someone who works in the industry s.22, I could see this creating a lot of heated conflict both off and ON the mountain.

It is a fine balance between utilizing the terrain we have for recreation and as jobs to support ourselves, but this tenure would tip the scale. Great idea, but not a good location unfortunately.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 29, 2015 8:43 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Heavily opposed to this application. Please keep them out of Kokanee glacier park. s.22 a Nelsonite, I am
strongly opposed to anymore heli ski applications in the kootenay/Columbia region.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 1, 2015 2:44 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am s.22 the owner/operator of a backcountry ski lodge (Valhalla Mountain Touring - www.vmt.ca) located a short distance NW of the proposed Kootenay Heli Skiing tenure.

While in general I support adventure and recreational tourism for the West Kootenays, I have concerns about the proposed heli skiing operation.

The proposed area is in a well established recreational ski touring area. There is a vibrant population of local and visiting skiers who enjoy a quiet, pristine experience in the mountains, and these locations are getting more difficult to come by. Backcountry ski touring is growing quickly as a sport, as the success of my own business can attest, and it's important to preserve areas for this type of largely non-mechanized recreation, particularly in areas that are already used this way.

There are already many heli ski, cat ski and ski touring operations in the region that have much larger and more diverse tenures and I feel that it would be better to have these operations running at capacity rather than increasing the area of land that is affected by the noise and skier traffic in relatively remote wilderness areas.

The proposed operation will have a dramatic affect on the experience of ski tourers staying at the Alpine Club of Canada's Kokanee Glacier Cabin, with constant noise of helicopters. Guests at my own operation frequently comment on the silence and tranquility that these mountains offer, and it's difficult to imagine constant and nearby heli traffic not having an impact on guest experience and subsequent bookings.

Thanks for considering my comments.
Jasmin Caton

Jasmin Caton

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 30, 2015 11:50 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

The application for a heli-skiing operation in the Duhamel watershed has recently been brought to my attention. I have looked at the application document and have strong concerns about the noise pollution implications for those of us living immediately below the proposed helicopter flight paths. This is a fairly densely populated area. I expect that many area residents have, like myself, chosen to live here because of the peaceful environment s.22

s.22 I am extremely disappointed by the prospect of having to put up with the noise of multiple helicopters passing overhead for several months of the year.

I am in agreement with the process concerns raised by Area F RDCK Director, Thomas Newell.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 30, 2015 11:24 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I oppose more tenure granted to new ski operations- the land is mostly used up. Kokanee park is mostly surrounded. There needs to be room for local recreationists, as well as for wildlife. We are saturated with mechanized ski operations- and some of them could use more business. There is no room for another one.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 30, 2015 11:09 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am a resident of Nelson, BC and am opposed to this application.

I am opposed because of the excessive noise of helicopters, the abundant fuel consumption of helicopters polluting the environment and because of the impact heli-skiing would have on the current back country recreation in this area.

Thank you,

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 30, 2015 10:10 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I completely agree with the article that was written above. s.22 I support
locals going out into the backcountry on their own within their budget and enjoying nature. This is what makes Nelson
so special being in the heart of the mountains.
Regards, s.22

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 30, 2015 8:39 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am concerned that our area is already saturated with heli-ski and cat-ski operations. Adding one more will make it harder for existing businesses to survive. The amount of wild backcountry is a limited resource and trying to carve it up among yet more operations seems like it will diminish the enjoyment of those who are already using it. In addition, as a Nelson resident, the prospect of yet more helicopters taking off and landing--the sheer noise--is upsetting and seems unfair. The atmosphere that 10,000 of us live in all the time must be loudly impinged upon for the recreation of a very small number of people at any one time. Please don't impose this new heli-ski operation on us.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 30, 2015 7:41 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Has there been any consultation with First Nations? This is a plentiful area with high resource value and several battles as to who has title to the land.

There is no comment or documentation which addresses the impact the proposed development will have on local water users. Developing infrastructure in forested areas comes with large environmental impacts.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 30, 2015 1:16 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571]. It has come to the attention of backcountry users in the Kokanee Glacier Park area that an application for heli-skiing has been submitted. The file # is 4405571. As a ski-tourer of 3 decades, I am very much a...

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 30, 2015 11:41 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Dear Sir or Madame

We would like to put forth some issues we have with the proposed tenure application submitted by Kootenay Heli-Ski Inc., of Nelson, BC.

Representing the Alpine Club of Canada and it's 11,000 members we would like to express our concerns of this proposed operation and its impact on a backcountry ski and hiking destination in the vicinity. The Alpine Club of Canada operates a remote facility in Kokanee Glacier Provincial Park and in close proximity to the proposed tenure . We feel it would be a detriment to the guest experience with this form of non-mechanized recreation being so close to the Park. This is a very popular destination in winter accounting for approximately 2000 user nights between December 1 and April 30 each year (and approximately 3200 year round). The immense popularity has meant a lottery draw over the past 10 years to reserve a place in the facility. It is our belief that helicopter ski operation noise levels, especially in the Arlington area of the tenure, will deter visitation to this popular destination as users are seeking a quiet time in a remote area to spend their time off.

We look forward to your response.

Lawrence White

for

Wayne Campbell

VP, Access and Environment

The Alpine Club of Canada

Lawrence White

lwhite@alpineclubofcanada.ca

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 30, 2015 8:52 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I strongly oppose this tenure as I am a resent s.22 and I already have to listen to and tolerate the steady traffic of small aircraft from the Nelson airport let alone a steady stream of helicopters pounding overhead as they run up six mile and over saturating the backcountry witch I mover here for to enjoy....there are enough heli and cat ski operations in the area that aren't sitting right on top of permenent residents as these guys intend to operate out of the Nelson airport disurbing the entire town and the surrounding rural residents. I strongly oppose thus tenure.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 29, 2015 11:38 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I use this are for hunting, snowboarding, and sledding. It would be nice to see roads and parking upgraded to both 6 mile and redfish as parking is minimal. I dont mind sledding in an area with choppers but their customers can pay for convenience not exclusivity. Sharring is caring.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 29, 2015 10:32 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Hello,

I am opposed to Kootenay Heli-Ski Inc.'s tenure application being granted for the following reasons:

1) This will cause a huge increase in the noise that residents of Nelson will have to listen to. The heli-port that the applicant is planning on using is very central to the downtown core of Nelson (on the waterfront which magnifies the sound), and there will be a huge increase in the amount of helicopter use in the area flying in and out of Nelson multiple times throughout each day with re-fueling and guest flights. This alone should make this application be denied.

2) The tenure area overlaps with areas that are heavily trafficked by local users in the form of ski-touring, and snowmobiling s.22

s.22 A helicopter using it for heli-skiing will cause much of the terrain to get used up (tracked out) way faster than the local users would normally cause it to be, and this will cause ongoing conflicts.

3) This will drastically destroy/diminish the quality of experience for guests who come to Nelsons prized Alpine Club of Canada: Kokanee Glacier Cabin for ski-touring as they will be forced to watch and listen to the heli-skiing going on all around them as they are ski-touring. I was recently up there ski-guiding and the terrain which the applicant has applied for is highly visible and close to the terrain that is used by guests at the Kokanee Glacier Cabin.

4) The applicant will have to cut numerous heli landing and pick-up sites throughout the tenure area in prime wildlife habitat and old growth forests. This application only goes into a Mtn Goat assessment, but it says nothing in regards to wolverines or other species that use the area.

5) Unlike most other heli-ski operators, this tenure area is small for heli-skiing use, which will compound the conflicts which will occur with local users as it will be forced to overuse the limited area with heli-skiing, and thereby also cause a lesser quality product to be offered to its own guests on a more regular basis.

It would be better for a ski-touring operation to be granted for a portion of this tenure as it would have an exponentially lesser impact on the local users and environment, and it would offer more opportunity for ski-touring which is highly in demand at Kokanee Park as the lottery system which is in place there barely services a fraction of the people who annually apply to ski-tour at Kokanee.

6) The latest statistics of mechanized skiing (heli and snowcat) show that there is a noticeable shift in the demographics of their potential clients. The industry is shifting away from the less sustainable mechanized ski options, and clients are booking more and more into more sustainable self-propelled options such as ski-touring and split-boarding. In fact most of the growth in the backcountry ski industry is specifically in ski-touring. This tenure area should be preserved for ski-touring as there is already a very high number of snow-cat and heli-ski operators in the Nelson area, more than enough to meet the shrinking market demand of mechanized skiing.

Thank you for taking these points into consideration for this decision.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 29, 2015 3:47 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am writing to express my concern for the Kootenay Heli-Ski Inc. application (#4405571).

1. There is already too much air traffic noise, and to have that noise increased all winter long is not acceptable.
2. I am a backcountry user, and heli-skiing uses up much more terrain than skiing or snowshowing. Also, the reason I go into the backcountry is to get away from the noise... not be inundated with helicopter traffic and noise.
3. Helicopter emissions (CO2 and NOx) continue our stupid trajectory towards catastrophic climate change. Ironical that the helicopters used for this ski operation are helping bring about the warming that our local area is projected to have by all climate models - warmer temperatures, less snowfall.

Please do not allow this proposal to go forward.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 29, 2015 3:27 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

One flight leaving in the morning and coming back in the afternoon is a small price to pay for the economic benefit of this application. even if they come back to fuel up I believe it is good for Nelson good for tourism and will help give Nelson more economic stability.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 29, 2015 2:24 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

As an avid backcountry skier and local resident who periodically utilizes much of the terrain proposed for use in this application, and as a regular winter user of Kokanee Glacier Provincial Park, this application would significantly compromise public enjoyment of these beautiful, wild places. The skiable mountains of the Kootenays are already over-run with unaffordable commercial mechanized skiing operations, and the cumulative impact is compromising all other incompatible values. I strongly oppose this application.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 29, 2015 1:24 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

As a recreational user of the crown land, and a resident who would be affected by the increased noise, user conflict and CO2 emissions by such a development I'm strongly against this. I see this kind of economic development in such a saturated market for such a small portion of the population incredibly irresponsible. The low elevation terrain available and rising temperatures makes this a tenuous investment at best. Strongly opposed.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 29, 2015 1:09 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

The Kootenay Mountaineering Club would like to make a submission on the application by Kootenay Heli-Ski Inc. for a commercial heliski operation near Nelson.

While we are not opposed to heliskiing in general, or to the idea of a new heliskiing operation near Nelson, we are concerned that some of the proposed landing sites in this application conflict with backcountry ski area frequently used by our members and others of the skiing public. Also, we are concerned that some of the sites conflict with wilderness values in Kokanee Glacier Provincial Park.

Some of our specific concerns are:

- Some sites in the Arlington and Outlook areas (44, 50, 106, 107, 108, 109, 117, 119) are right on the boundary of the park, adjacent to or near areas which are used by backcountry skiers based at the very popular Kokanee Glacier cabin. Frequent helicopter traffic would significantly detract from the wilderness values of ski touring in the park. Our club has an annual ski week at Kokanee Glacier, and many of our members participate in other ski weeks in the park throughout the winter.
- All of the sites in the West Kokanee Creek drainage conflict with ski runs in an area which is frequently used by Nelson-area residents, who use snowmobiles on the Forest Service road to access ski touring terrain.

We are therefore opposed to this application if it included sites in the areas mentioned above.

Although we appreciate the importance of heliskiing and other commercial recreation to the economy of the West Kootenays, we ask that the government recognize the importance of non-commercial, non-mechanized, backcountry recreation in the regional economy, as well as its importance to the lifestyle of residents of the area. The West Kootenays are a world-renowned destination for tourists who come here for backcountry skiing, and these visitors are an important part of our economy. This heliskiing application covers an area which is heavily used by visiting and local skiers because of its easy access from Nelson. We feel that such heliskiing operations would be better located in more remote areas.

We request the opportunity to meet with the proponent and Ministry staff, preferably in a public meeting format. Furthermore, we request that this application be dealt with by Ministry staff in your Nelson or Castlegar offices, not in Cranbrook, as staff in the West Kootenays are more likely to be familiar with land use and recreation issues in the area, and are more accessible to local residents who may wish to offer input.

Doug Clark,
President, Kootenay Mountaineering Club

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 29, 2015 12:54 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Dear application reviewers,

s.22 I am writing to express my concerns about this application. The proposed tenure would result in a great deal of extra noise and impact on the self-propelled winter recreation areas accessible from Nelson. While our city promotes tourism, we do not do it at any cost. Many people come here to recreate in the backcountry in and around Kokanee Glacier National Park for the peace, quiet and natural beauty it offers. A heli ski operation in the area will detract substantially from this important environmental and economic asset. I urge you to reject the application.

Thanks for considering my input,
s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 29, 2015 12:50 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Thank you for considering comments regarding the commercial Heli-Ski proposal, File: #4405571.

As a wilderness tourist, I value the sounds of nature and places where wildlife and its fleeting habitats are protected. The proposed area directly borders Canada's premier national treasure, Kokanee Glacier Provincial Park. It is my hope that you will deny the commercial Heli-Ski proposal to protect this area from noise and fossil fuel pollution, excessive air traffic and human encroachment.

I imagine someone sitting at a desk in the Ministry will guffaw at this, but I wonder, who speaks for the mountain goats? It is a fact that high decibel noise from intrusive, whirling choppers, will directly impact sensitive mountain goats and be disruptive to people. These valleys are narrow and sounds echo even from the ridge tops.

It's difficult, to spot white mountain goats in white snow, even from helicopters. Sure, pilots are required to alter their routes if they spot a mountain goat, but let's assume it is extra difficult to spot mountain goats with a cab full of paying clients. When faced with re-routing or eliminating a "target demographic" client's once in a life time heli-ski experience vs. disrupting the path of a mountain goat, who wins? And who reports the path was crossed? Day skiers in this demographic have a vested interest; they have a one day window for multiple ski runs, and most have an untrained eye for spotting mountain goats from helicopters. Let's assume the clients won't provide the pilot much help spotting mountain goats. RE: Operational Recommendation: "Clients should be advised to inform pilots/guides if they observe mountain goats and then that area is deemed "occupied" (BC MOE 2006)"

I wondered what 'operational strategies' the company's biologist consultant would would employ to "...minimize impacts on mountain goats near the company's operating area," since, the report notes: "Mountain goats react to human disturbance to a higher degree than most ungulates." I laughed when I read the company "...has amended the proposed zones in the tenured area eliminating all goat habitats." Do they really want us to believe goats don't stray from their routes?

I urge The Ministry to keep this place special and deny Kootnay-Heli-Ski, Inc.'s proposal. The company can reach this target audience in other ways-- ways that will not have lasting, ruinous impact. By denying this proposal and protecting wilderness, wildlife and the quiet serenity of the mountains, the region's economy will continue to flourish for years to come. Audiences that respect the wilderness and leaves no trace in the woods (Think slogan: Pack it in and pack it out.) continue to seek special places. Please, don't ruin it. Please make the right choice for future generations of humans and wildlife.

Thank you for your consideration.

Sincerely,

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 29, 2015 12:32 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am against yet another heli-tenure being approved in this region. There are enough already to fill this privileged, niche-market and will soon be obsolete with the rising price of gas. Not to mention the impact on wildlife as well as terrain modifications in a pristine environment. Enough.

Thank you for considering my opinions.s.22

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 29, 2015 9:50 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am a resident of Nelson I am opposed this application for the same reasons outlined in the letter submitted to you by s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 29, 2015 9:49 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

i am opposed to this application due to the excessive noise from helicopters that it will generate as helicopters shuttle between the Nelson airport and the Kokanee area, a shuttle that normally takes them directly along the heavily developed West Arm corridor. I am also opposed due to the heavy skier traffic it will generate on areas around Kokanee Glacier Park, areas that are close to many publicly accessible ski touring areas. We have enough commercial tenures in this West Kootenay already.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 29, 2015 9:06 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I do not support another heli-ski operation in this area due to concerns about noise, wildlife and ecological impacts, and impediments to local enjoyment of the area (i.e., through self-propelled snow sports such as back country touring).

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 1, 2015 12:53 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

- If given approval, KHSI will cut large cleared areas as 'landing' and 'pick-up' zones bordering Kokanee Park. I do not believe that a new application right next to this park is appropriate; parks need buffer zones for wildlife (such as sensitive wolverines and caribou).

- The proposed tenure application areas overlap with areas historically and regularly used by locals for ski-touring. Commercial operations tend to displace locals from their 'backyard', allowing only the elite paying guests to have access instead.

- Helicopters are noisy. As this application involves day trips from Nelson, there will be flights back and forth, as well as constant noise flying around the park perimeter. This too is not good for wildlife in and around the park, as well as decrease the quality of experience for guests coming to the Kokanee Glacier Cabin - a world renowned Alpine Club of Canada ski-touring destination.

There are already more than enough snowcat and heli-skiing tenures in the West Kootenays to meet the market demand. We should ensure there is enough wild space for wildlife, and places for self-propelled winter recreationists.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 1, 2015 12:01 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Hello -

I am writing as a resident^{s.22}

I have a number of concerns with KHSI's application:

- KHSI intends to cut large cleared areas as 'landing' and 'pick-up' zones bordering Kokanee Park. I do not believe that a new application right next to this park is appropriate; parks need buffer zones for wildlife (such as sensitive wolverines and caribou). This province is taking tremendous and controversial actions to protect caribou habitat in this region; it seems completely contradictory to allow for a helicopter tenure bordering the park and in this exact area where caribou are near extirpation. It will be a nail in the coffin.
- The proposed tenure application areas overlap with areas historically and regularly used by locals for ski-touring. These commercial operations tend to displace locals from their own backyard, allowing only the elite paying guests to have access instead. There will likely be serious conflict in this area if this application goes through.
- As this application involves day trips from Nelson, there will be flights back and forth, as well as constant noise flying around the park perimeter. This noise is not good for wildlife in and around the park, and will undoubtedly decrease the quality of experience for guests coming to the Kokanee Glacier Cabin - a world renowned ski-touring destination.

I believe this application is rife with concerns on many levels. It is not compatible with the area and will put the park in jeopardy in many ways, from wildlife, to local conflict, to current use.

There are already more than enough snowcat and heli-skiing tenures in the West Kootenays to meet the market demand. We must ensure there is enough wild space for wildlife, and places for self-propelled winter recreationists.

Thank you for considering these comments.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 1, 2015 10:46 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am very concerned about this applications impact related to:

1. wildlife impacts on buffer zones adjacent to Kokanee Glacier park. I would like to see a comprehensive wildlife and environmental impact study, funded by the proponent, shared publicly.
2. Impact on non-motorized backcountry skiing - the tenure as described in the application is adjacent to popular backcountry ski areas and will have a negative effect on both the ACC Kokanee Glacier operations and commercial operations at Mt Carlyle.

It also negates any possibility of additional future, non-motorized backcountry ski operation development in this tenure. Non-motorized activity should be a higher priority then motorized commercial recreation, in this sensitive area.

I request that this application be either rejected or delayed until further assessment of these impacts can be completed.

Thank you.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 1, 2015 3:55 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am against the KHSI application to operate a heli skiing business in and around Kokanee and Nelson, BC. My two main concerns are:

1. The amount of helicopter traffic in and around the Nelson area due to this operation will be significant. In a small valley like this one the noise produced by helicopters is wide-reaching and should be considered noise pollution.
2. The proposed tenure for operation borders and includes areas that are currently used for non-motorized winter activities. A heli skiing operation would force the locals who use this area out leaving it only to the high paying guests who can afford the heli skiing trips. I would venture a guess that 90%+ of the potential guests for this operation would not be local to the area. Essentially, the visiting tourists would be displacing the locals from using the land.

Please do not allow this application to pass.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 1, 2015 3:14 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Hi,

I am an avid backcountry skier, snowmobiler, and hiker living in the Kootenays and I am opposed to yet another heliskiing operation in the area. I have heliskiied in the past and worked with heliskiing operations and I feel there is enough of them in the Kootenays. They also inevitably feel that they somehow own the land and try to restrict the use of snowmobilers and ski tourers which also greatly adds to the economic development of this province. If you would like to talk to me further please feel free to do so.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 1, 2015 2:54 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

s.22

I have and my neighbours have on numerous occasions asked the Helicopter operators to not fly directly over our homes, not hover up and down the runway for sometimes hours at a time and they have never changed their operating procedure to accommodate our requests. The noise generated by a helicopter is very high even at a distance of half a kilometre. I do not want additional helicopters coming and going from the airport and I feel sorry for anyone under or near their path in this proposal. Heli-skiing is a fine activity but it should be done in areas that are not impacting the enjoyment of others and their properties.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 1, 2015 1:02 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

There are adequate help-skiing services in this area and an additional operation represents a tipping point for disturbing wildlife, quiet recreational skiing and the peacefulness sought by many when they visit this area, particularly in the winter season. Please decline this application for the sake of preserving this park area as closely as possible for those who seek a different natural experience. Thank you.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 1, 2015 7:38 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I'm writing to oppose the Application of Kootenay Valley Helicopters Heli-ski operation. I feel the areas in which this operation wishes to do business will create much conflict. The Long Creek "Zone" Borders the Southern Boundary of Our Non-Mechanized , Backcountry Ski touring business. Having the constant noise and visual activity, of helicopters directly in front of our clients, would negatively affect our business s.22 Our

s.22

s.22 come from all over North America and Europe to enjoy the pristine, remote wilderness of Beautiful B.C. Our guests spend a great deal of their day outside .s.22

s.22

extremely difficult . Our other concern is that this application encompasses a small tenure , and if KVH Heli ski business were to become successful it is very possible they could outgrow their proposed tenure and ask for a larger tenure area, which could make it even more difficult s.22

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 1, 2015 4:29 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I have a number of concerns with potential KHSI Operation on the Boundary of Kokanee Park:

- Helicopters are noisy. As this application involves day trips from Nelson, there will be flights back and forth, as well as constant noise flying around the park perimeter. This too is not good for wildlife in and around the park, as well as decrease the quality of experience for guests coming to the Kokanee Glacier Cabin - a world renowned Alpine Club of Canada ski-touring destination.

- If given approval, KHSI will cut large cleared areas as 'landing' and 'pick-up' zones bordering Kokanee Park. I do not believe that a new application right next to this park is appropriate; parks need buffer zones for wildlife (such as sensitive wolverines and caribou).

- The proposed tenure application areas overlap with areas historically and regularly used by locals for ski-touring. Commercial operations tend to displace locals from their 'backyard', allowing only the elite paying guests to have access instead.

There are already more than enough snowcat and heli-skiing tenures in the West Kootenays to meet the market demand. We should ensure there is enough remote and undisturbed wild space for wildlife, and places for self-propelled winter recreationists.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Sunday, May 3, 2015 7:15 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I s.22 live in the area where the heliskiing project is proposed. From the email we got to know this project and are very concerned about the impact of the project will bring to the region, for example, the noise of the helicopters and the traffic of the tourists. We also concerned the potential disturbance on the habitat of the wildlife. We chose to live in this area is because the wilderness. We'd like the government will have more public consultation on the project with the affected residents. Thanks you!

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Sunday, May 3, 2015 12:10 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am opposed to this application because in my experience 5 years of back country skiing) when different activities (in this case helicopter and self-propelled) share a common boundary conflict usually arise which diminish the pleasure and viability of both. Secondly, the commercialization of the back country (especially near population centers) reduces the potential for future generations to have a back country experience.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Saturday, May 2, 2015 3:30 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I feel that this application should be denied for a number of reasons. Please contact me for any further information if needed. s.22

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Saturday, May 2, 2015 7:47 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

A heli ski operation is a detriment to a natural eco system, and wilderness experience. I work at a back country ski touring lodge and have visited many others heli operations. Heli skiing is a sport for the super rich and though that is nice for the economy it doesn't improve quality of life for local residents. A back country hut or lodge would serve the community better.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Saturday, May 2, 2015 12:37 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

To much noise. Already to many helicopters flying around Nelson. They fly to low and disrupt the peace.
Habit conflicts with wildlife and it infringes on Kokanee Glacier Park.
Helicopter skiing has the greatest carbon footprint in the ski industry and should be limited.
Wildlife are being squeezed out of habitat, this proposal would be one more nail in that coffin when we should be restricting snowmobile and other access as well.
I say no to this proposal.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, May 5, 2015 9:49 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

This application covers areas that are longtime local back-country ski areas in the Enterprise and Silverton creek drainages. Heli-skiing is not compatible with public back-country skiing.

Also the applied-for area borders right up against west and south borders of Kokanee Glacier Provincial Park. This is highly inappropriate considering the potential for disturbance of wintering animals within and just outside the park, and considering the long-standing and fully-booked winter backcountry ski activities centred in the park.

Thank you for the opportunity to comment.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, May 4, 2015 5:12 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Do I support another helicopter company operating out of the Nelson airport-No!!!

s.22 I can't hear myself think for the noise of the helicopter
flying 10 feet off the ground up and down the airport for the past hour. This goes on year after year We are tired of it
Another company doing the same thingNO!!!!

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Monday, May 4, 2015 2:16 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I would like to register my concern with respect to the noise issues within the city of Nelson as well as the adjacent area that will result from the implementation of the proposed project. The issue was not addressed at all in the application. The number of daily helicopter flights was not clearly indicated.

No discussion of the amount and impact of air pollution from helicopter operation was addressed.

Both noise and air pollution affect a far wider area than the 144 square km of the use area, effecting approximately 60,000 people in the greater Nelson region. The use of Nelson airport as the base of operations will lead to a continuous barrage of noise on the residents of Nelson that will be magnified by the topography.

I also question the completeness of the wildlife survey that involved only one day of helicopter overflight, minimal ground survey and yet purports to encompass 144 square km.

The impact on existing recreational users of the region was dismissed as trivial, yet again will impact any users of Kokanee Glacier Provincial Park, a wilderness area, that will no longer be wilderness with constant helicopter traffic.

I strongly urge you to categorically deny this permit application.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, May 6, 2015 10:06 PM
To: FLNR Cranbrook ARFD FLNR:EX; Min.of.Forests@anything.bcgov; Lands.
&.Natural.Resource.Operations@anything.bcgov
Subject: Land Application Comments [File #4405571].

s.22

s.22 We do not need another mechanized heli-ski operation here in this area. It would take away from the character of Kokanee Prov Park and have a significant noise pollution to all the communities who boarder this land. s.22

s.22 and am certain that a heli-ski operation is not what we want in this land. Stellar Heli Ski already operates out of Nelson and skis very close to the applied tenure. Stellar Heli Ski offers Nelson based day trips as well as multi-day trips so the customer demand is already full filled. Snowwater Heli-ski is also very close to Nelson BC and offers local heli skiing multi-day packages. We have lots of cat ski operations as well of!

fering day trips out of Nelson & Rossland areas. The significant disturbance to local residents alone should be enough for this not to go through. Also the significant impact on local wildlife will have a great toll. We have Wolverine, Grizzly, Black Bear, a variety of birds, deer, elk, moose, mountain goats just to name a few that call home to the Kokanee. Please encourage Kootenay/Kokanee Heli Ski to find a different area far from the Kokanee Range to run a heli-ski operation. Or look at more environmentally friendly eco-tourism ventures if they want to be in my backyard. Don't let this tenure application go through! Please feel free to contact me if you have any questions.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, May 6, 2015 10:05 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

"REALLY" ?? such a nice town with a national park (kokanee) so close it would be a shame if heli's were buzzing both.

P.S. see Nelson next winter to ski tour, enjoy your restaurant's and people !

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, May 7, 2015 10:02 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Hi there,

I've been into the Kokanee Glacier Hut via helicopter s.22 So I used a helicopter to get into this backcountry hut. From reading the description of the management plan, I don't really think this application is in the best interest of the public. There will be too much helicopter noise for the people who are supposedly enjoying a "backcountry ski" and for the critters.

This area is a provincial park and it should be respected as one without distractions and pollution caused by helicopter ski operations.

For the critters who cannot speak up for their territories such as the wolverine or the mountain caribou (which needs it's habitat to reclaim), there would be no benefit to them. It would only stress them out and cause more habitat degradation. There are plenty of heli operations in British Columbia.

Already backcountry huts such as the Blanket Glacier Chalet have plenty of problems with tenure overlaps from heliski operations and this backcountry ski hut does not need to be encroached upon by daily helicopter operations.

Lastly, British Columbia needs to limit the amount of heli operations in order to limit the additional CO2 into the atmosphere as global warming is real. More and more people are turning to backcountry skiing to be less carbon dependent and the world doesn't need additional daily helicopter operations producing CO2.

I hope you seriously consider the ramifications of this proposal to the health of the Kokanee Glacier Provincial Park area and surrounding landscape and animals that live there. I don't want to see this development approved.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, May 7, 2015 7:42 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

s.22

s.22 and have no allegiances with any other heliski company or any other ski operation in the Kootenays. I would happily support new helicopter ski operations in appropriate regions, but I feel that this particular proposal is not appropriate given the conflicts that WILL arise with other backcountry users in that area.
Thank you for listening s.22

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, May 7, 2015 6:08 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

We do not need another ski operation in the koots. This whole area is an historic ski touring area for a large group of people. I have been ski touring this entire zone with many friends for s.22 years. Heli traffic is quite disruptive to many user groups. Not to mention wildlife. Especially bordering a major park we need a non motorized buffer to ensure the integrity of the park as well as to ensure less noise pollution for users of Kokanee park. There is no shortage of options for this kind of recreation(heli skiing). It is not needed or wanted by the general public of the kootenays.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, May 7, 2015 6:03 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am very concerned about that this operation will disturb the peace of self-propelled users and wildlife in Kokanee Glacier National Park.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, May 12, 2015 7:57 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I just spent 4 days s.22 up at Rosenip Lake, which will be directly affected by this tenure proposal. Truly amazing place. I think Parks should focus first on keeping the sleds/motorized traffic out of the Park before granting more tenure for heli skiing. Saw sled tracks around lake and in park.

Would the perfect solution not be to: 1) apprehend individuals on motorized vehicles in park. 2) fine them and confiscate their motorized recreation vehicles, trucks, trailers, etc. 3) sell items at auction and use funds for further enforcement. Such action would spread like wildfire in the community and long term enforcement would likely not be necessary.

I am not an environmental activist at all and understand that there will always be motorized traffic in the backcountry. The parks however, NEED TO BE PROTECTED! Please feel free to contact me for any questions at all.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, May 14, 2015 1:25 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I do not support the heliski proposal for the 4 areas adjoining Kokanee Provincial Park.

I am concerned that the proposed heli-ski area will detrimentally affect those using Kokanee Provincial Park during the winter - especially those based out of the Kokanee ACC Cabin.

The noise from the helicopters will significantly impact the enjoyment of the Park terrain around the cabin.

The highest level of impact would come from the proposed Arlington area (2), which includes Mt. Robert Smith, and is only 3km from the Kokanee Cabin. So I don't feel that access to this area should be allowed.

While the proposed Long area (1) on the north boundary of the park is not close enough to the Kokanee cabin and adjoining terrain to have a direct impact, the proposed heli access routes are through the Arlington area (2) very close to the cabin. It is suggested that the flight routes stay at least 5km from the cabin.

While the proposed Cornfield (3) Outlook (4) areas do not appear to impact the typical ski terrain near the Kokanee Cabin, the helicopter proximity will again have a detrimental affect on the enjoyment of Kokanee Provincial Park in the winter.

I do not support heli-skiing in the areas adjoining Kokanee Provincial Park. If the proposal is approved, I feel that a buffer of at least 2km from the Park Boundary should help to reduce the impact on the Park's guests and on the historic Kokanee cabin terrain.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, May 13, 2015 4:11 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Do not approve of heli-skiing application.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, May 13, 2015 5:59 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Given the number of land use permits already issued for mechanized skiing as well as hut based ski touring operations in the province of BC, I am strongly opposed to any more being issued. The proponent for this operation claims that only "periodic resource based activities" would be the only other visitors to this tenure. Well, I have news for them; there are an ever increasing number of wilderness backcountry users who are finding it more and more difficult to find mountain terrain that is not being used by a commercial operator. Usually any land not being used commercially is now overrun by snowmobilers. I say it's time to stop the madness in our wilderness.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, May 12, 2015 9:26 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Have ski toured in this area multiple times. With the proximity to the park helicopter skiing would definitely impact the park in a negative manner.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, May 12, 2015 7:49 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

With regard to Application #4405571, the FWKP wishes to comment on this proposed heli-ski operation in the Nelson area. I have been asked by our President s.22 to forward this to you on behalf of our organization. This is in the form of a three page .pdf document which does not appear to transfer into this comment box in a readable form. Could you please give me a name and email address so that I can get it to you by attaching it to an email? Failing this I will mail it to your Land Tenures Branch.

Sincerely
s.22
FWKP Member

/Users/destjorre/Desktop/Trans.FWKP Heli Ski Submission.pages.pdf

Friends of West Kootenay Parks
contactus@fwkp.kic.bc.ca

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Sunday, May 17, 2015 11:34 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Please leave us places to play. We live here to ride and it seems unfair and selfish to profit of of our backyards and push us out of them. There are plenty of cat and heli ski lodges around and less empty wilderness. It is so sad.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 15, 2015 12:29 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

There are enough heli-ski operations. Why create more of these operations which will contribute to more air pollution, more monopolization of pristine backcountry areas, more mountain goat deaths and a larger creation of nature as a 'circus' for the rich 1%.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 15, 2015 11:24 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

It is with great dismay that I read and learn about a proposed heli ski operation adjacent to Kokanee Glacier Provincial Park. This proposed heli ski operation is a day skiing operation with its primary ski terrain butting up against the boundary of this remarkable park. I have ski toured in Kokanee a dozen times over the last 10 years. Of course a dozen times does not mean 12 days it means 12 weeks of ski touring at 7 days a week. I am very concerned about the amount of NOISE this operation will create and the impact of heli skiing activities on our enjoyment of the park and welfare of the wildlife.

Without having the Alpine Club of Canada stats in front of me I can still say with confidence that they book this cabin weekly from mid December to mid May accounting for 20 - 22 weeks per season. Each week books 15 people at \$1000. per person equaling \$300,000. per season. The numbers are approximate but I don't think too far off the mark. This is a significant income for the Alpine Club of Canada (certainly not by the standards of a heli ski operation) and a great output of cash for 300 people who ski tour who love and are faithful to the excellent ski touring that Kokanee Park has to offer on an annual basis. I am one of them!

With the heli ski operation butting up to the park boundary and heli skiing occurring on a daily basis the amount of noise generated will greatly detract from the quality of the ski touring experience in Kokanee. The proposed Arlington area (zone 2) brings the heli skiing to the boundary at Mt Robert Smith only 3 km from the Kokanee cabin. This area is a prized area for many of the ski touring enthusiasts in Kokanee and this proposed operation will greatly interfere with the quality of our wilderness experience. Noise from both the Outlook and Cornfield areas will also have an impact on the park users and wildlife.

I feel backcountry skiers have the right to a back country experience WITHOUT the daily noise of helicopters. B.C. already has an abundance of heli ski operations and the other operations providing an equally valuable ski touring experience are at risk of losing clientele.

Without a doubt I am concerned about the wild life that use this park in the winter. This wildlife will be impacted by the daily presence and noise created by helicopters and heli skiers and will be forced out of the areas they currently occupy. Kokanee has an abundance of wolverine and goats that frequent the ridges along which the park boundary lays. Spotting them is a real delight and contributes to our joy of non mechanized skiing. The proposed flight paths take the heli's directly along the ridge tops where these species can be found. I care about preserving the integrity of the park by protecting its boundaries from the activity of heli skiing.

I encourage you to head the words of everyone who writes in. I am ALARMED that this company believes they will be operating in this area in 2016. Please put a stop to it. The park is virtually surrounded by this proposed plan.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 15, 2015 8:34 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

We do not need another Heli Skiing operation affecting what remains of our mountainous wildlife. This park area needs to be preserved in it's natural state and left for future generations to enjoy.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 15, 2015 8:06 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

s.22 I have seen an increase in use of the
backcountry by all user groups in recent years .
I feel that a heli ski operation in this area will put too much pressure on this area

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, April 24, 2015 2:34 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am opposed to the idea of a new heli skiing operation so close to the Nelson area. Being based out of the Nelson airport it will undoubtedly create much noise pollution with multiple turns for client shuffling, refuelling etc. Constant helicopter traffic bordering our Kokanee Glacier Park does not sit well with me also.

Thanks.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 23, 2015 6:51 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

reason for opposing said application .As a long time back country user the local users will feel a bit disenfranchised by another ski operation . There already exists a lot of back country use in the said areas .sledders and back country skiers maintain a group of cabins in these areas already.CONFLICTS between these groups will become a reality if heli skiing commenses in these areas

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, April 23, 2015 4:07 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I am opposed to yet another heli-ski operation in the Nelson and surrounding area due to the increased air traffic, noise pollution and environmental degradation. This application needs to be denied. Thank you.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 22, 2015 11:27 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

as a winter backcountry user, i snowmobile and snowboard in these areas currently. if there were absolutely no overlap in the area usage, i wouldn't see a problem with this in terms of who is on the slopes. the application claims that it doesn't clash with any current users, but i seriously doubt this. and historically speaking, when sledders and cat/heli operators have met in the backcountry in the past, it rarely goes as friendly as anyone would claim.

in terms of heli noise in nelson, and cat/heli ops market saturation in this area, i don't see this going well.

overall i'm opposed to this application.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 22, 2015 10:28 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I would have to disagree with this application as it clearly overlaps with current snowmobile and ski touring up Sitkum Creek drainage which is a very popular area due to its location relative to Nelson.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 22, 2015 9:03 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I would only agree to this application if it is shared with snowmobilers otherwise I have to decline this application.
Crown land is for all to enjoy at any time in the year.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, May 21, 2015 10:14 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I oppose this proposal. This area is already heavily used by many back country enthusiasts. I would not want to be asked to leave this area because of a heli-ski operation.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 29, 2015 6:36 PM
To: FLNR Cranbrook ARFD FLNR:EX; Front@anything.bcgov; Counter@anything.bcgov; BC@anything.bcgov
Subject: Land Application Comments [File #4405571].

On behalf of Wildsight, please accept these comments regarding file #4405571. Wildsight opposes the proposed heli-ski tenure outside of Kokanee Glacier Provincial Park that would include tenure in the Lemon, West Kokanee, Kokanee, Crusader, Enterprise and Sitkum drainages.

Kokanee Glacier Park and the surrounding area provides habitat for many species and a place for recreation and connection to nature. Wilderness and wild places are increasingly suffering from the encroachment of development and we must make land use decisions that recognize and reflect the importance Kootenay residents place on wildlife and wilderness values in our region. The park already suffers from the increasing impacts due to development, increased visitation and multiple user groups operating just outside the park boundary. The proposed heli-ski operation would add stress to the wildlife population and wilderness values this important habitat and quiet recreation space.

The impacts to the mountain goat and wolverine populations are of particular concern. Declining wolverine populations across North America have been attributed to habitat fragmentation and most viable populations are found in protected areas. Wolverines are long-ranging animals, travelling vast distances, like grizzly bears, and genetic diversity of the species depends largely on this ability to roam and breed.

Mountain goats are an extremely sensitive species and this area is important winter range for them. They react to human disturbance much more than other ungulate species and helicopter activity ranks very high on disturbance. Helicopters would be running all day and this could have a very significant impact on the mountain population.

The impacts of this proposed heli-ski operation must be evaluated in the larger context of the cumulative effects in the area from all activities currently taking place. The "Wildlife Impact Assessment, 2015" (pg. 14) that was submitted with the tenure application itself recognizes that it does not address these cumulative impacts: "Additional impacts that are not addressed within the scope of this document are the cumulative impacts on wide-ranging species of multiple winter-use tenures and other land management on the landscape." (pg. 14)

In closing, we oppose the proposed heli-ski operation as outlined in File #4405571. We feel strongly that the proposed activities would negatively and unnecessarily impact the wildlife and wilderness values of the area and that a land-use decision should be made that recognizes and reflects these important values. Thank you for the opportunity to comment on this proposal.

Sincerely,

Robyn Duncan
Executive Director,
Wildsight

Robyn Duncan

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Sunday, May 31, 2015 10:44 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

While I am two days past the deadline I am hoping you will still accept my letter of opposition to the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park.

My main concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

The following points describe my major concerns:

A commercial recreation tenure will act as a barrier to general public access. Increased noise and the further loss of public recreational areas again demonstrate the need for a land use plan in the lands surrounding Kokanee Glacier Provincial Park.

I am concerned about wildlife impacts from fragmentation of wilderness areas and increased helicopter traffic in the area, in particular adjacent to a protected area such as Kokanee Provincial park, as well as the cumulation of multiple tenures across the Kootenay Region.

As a resident s.22 I urge the province to strongly consider the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park.

Sincerely,
s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, May 28, 2015 10:45 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Heli-skiing should not be occurring near Provincial parks, nor should they be staging out of, or flying over a town like Nelson. There are already too many helicopters over Nelson in winter, which is very difficult for people with hearing or dizziness problems s.22

s.22 In addition, is there not already enough capacity for heli and cat skiing in the area and this may affect existing businesses?

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, May 28, 2015 8:55 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

What's next!!! We now have a Zip line just below Kokanee Park. Perhaps we can consider paving the road all the way to Kokanee Glacier Park and Gibson Lake with lots of vendors along the way so you can have your favorite soda, burgers and music while enjoying the great outdoors. People who truly appreciate and respect wilderness will have nothing to do with making a quick buck! If you only look at ways to make money, then you have no regard for wilderness values. I am strongly against this proposal...reeks of money not wilderness preservation !! So what will the next proposal be!! Changing wilderness into an amusement park. What are our values now ?Appalling to think!

s.22

Christensen, Cathy FLNR:EX

From: info@ecosociety.ca on behalf of s.22 via The West Kootenay EcoSociety
<info@ecosociety.ca>
Sent: Thursday, May 28, 2015 11:13 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 10:13

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

The following points describe my major concerns:

A commercial recreation tenure will act as a barrier to general public access. Regulations aside, commercial operators may harass the general public or cite safety issues to exclude the public. Increased noise and the further loss of public recreational areas again demonstrate the need for a land use plan in the lands surrounding Kokanee Glacier Provincial Park.

The wildlife impact assessments s.22 raised concerns about the effects of the proposed tenure on wildlife including: mountain goats; wolverines; and listed amphibians, reptiles and birds. Further study is needed to determine the full extent of mountain goat usage in the proposed areas. Wolverine are a species of conservation priority in BC, in Canada and internationally. The high decibel level of helicopter travel may negatively affect mountain goat, wolverine and grizzly bear behaviour. In addition, increased human-animal interactions may negatively affect a wide variety of wildlife species in the proposed areas.

s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

Kokanee Glacier Provincial Park is experiencing increased cumulative affects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of a cumulative impacts study of existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: info@ecosociety.ca on behalf of s.22 via The West Kootenay EcoSociety
<info@ecosociety.ca>
Sent: Wednesday, May 27, 2015 9:49 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Wednesday, May 27, 2015 - 20:48

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: info@ecosociety.ca on behalf of s.22 via The West Kootenay EcoSociety
<info@ecosociety.ca>
Sent: Wednesday, May 27, 2015 9:35 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Wednesday, May 27, 2015 - 20:35

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

Kokanee Glacier Provincial Park is experiencing increased cumulative affects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of a cumulative impacts study of existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: info@ecosociety.ca on behalf of S. via The West Kootenay EcoSociety
<info@ecosociety.ca>
Sent: Thursday, May 28, 2015 10:58 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 09:57

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

Kokanee Glacier Provincial Park is experiencing increased cumulative affects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of a cumulative impacts study of existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: info@ecosociety.ca on behalf of s.22 via The West Kootenay EcoSociety
<info@ecosociety.ca>
Sent: Wednesday, May 27, 2015 8:07 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Wednesday, May 27, 2015 - 19:07

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

The following points describe my major concerns:

A commercial recreation tenure will act as a barrier to general public access. Regulations aside, commercial operators may harass the general public or cite safety issues to exclude the public. Increased noise and the further loss of public recreational areas again demonstrate the need for a land use plan in the lands surrounding Kokanee Glacier Provincial Park.

The wildlife impact assessment by s.22 raised concerns about the effects of the proposed tenure on wildlife including: mountain goats; wolverines; and listed amphibians, reptiles and birds. Further study is needed to determine the full extent of mountain goat usage in the proposed areas. Wolverine is a species of conservation priority in BC, in Canada and internationally. The high decibel level of helicopter travel may negatively affect mountain goat, wolverine and grizzly bear behaviour. In addition, increased human-animal interactions may negatively affect a wide variety of wildlife species in the proposed areas.

s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

Kokanee Glacier Provincial Park is experiencing increased cumulative effects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of a cumulative impacts study of existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: info@ecosociety.ca on behalf of s.22 via The West Kootenay EcoSociety
<info@ecosociety.ca>
Sent: Wednesday, May 27, 2015 7:52 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Wednesday, May 27, 2015 - 18:52

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Christensen, Cathy FLNR:EX

From: info@ecosociety.ca on behalf of s.22 /ia The West Kootenay EcoSociety
<info@ecosociety.ca>
Sent: Wednesday, May 27, 2015 7:23 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Wednesday, May 27, 2015 - 18:22

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Christensen, Cathy FLNR:EX

From: info@ecosociety.ca on behalf of s.22 via The West Kootenay EcoSociety
<info@ecosociety.ca>
Sent: Wednesday, May 27, 2015 7:10 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Wednesday, May 27, 2015 - 18:10

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Christensen, Cathy FLNR:EX

From: info@ecosociety.ca on behalf of s.22 via The West Kootenay EcoSociety
<info@ecosociety.ca>
Sent: Wednesday, May 27, 2015 10:21 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Wednesday, May 27, 2015 - 21:20

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Christensen, Cathy FLNR:EX

From: info@ecosociety.ca on behalf of s.22 via The West Kootenay EcoSociety
<info@ecosociety.ca>
Sent: Wednesday, May 27, 2015 11:01 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Wednesday, May 27, 2015 - 22:01

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Christensen, Cathy FLNR:EX

From: info@ecosociety.ca on behalf of s.22 via The West Kootenay EcoSociety
<info@ecosociety.ca>
Sent: Wednesday, May 27, 2015 11:17 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Wednesday, May 27, 2015 - 22:17

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Christensen, Cathy FLNR:EX

From: info@ecosociety.ca on behalf of s.22 via The West Kootenay EcoSociety
<info@ecosociety.ca>
Sent: Thursday, May 28, 2015 3:09 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 02:08

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Christensen, Cathy FLNR:EX

From: info@ecosociety.ca on behalf of s.22 via The West Kootenay EcoSociety
<info@ecosociety.ca>
Sent: Thursday, May 28, 2015 6:00 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 05:00

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. My concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Christensen, Cathy FLNR:EX

From: info@ecosociety.ca on behalf of s.22 via The West Kootenay EcoSociety
<info@ecosociety.ca>
Sent: Thursday, May 28, 2015 7:07 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 06:06

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Christensen, Cathy FLNR:EX

From: info@ecosociety.ca on behalf of s.22 ia The West Kootenay EcoSociety
<info@ecosociety.ca>
Sent: Thursday, May 28, 2015 9:23 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 08:22

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, May 26, 2015 1:30 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Having hiked Kananaskis and Lougheed Park recently, the most annoying thing had to be the low flying helicopters giving tours. What a huge mistake this would be if our glacier had these noise machines flying by. We get away from the summertime highway motorcycle noise at home by heading to the mountains. Please do not approve this application.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, May 26, 2015 4:21 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I would very much like to ask you to decline the above-noted heli-ski application. There are already many hell/cat ski operations in our area. As a snowmobiler in this area for many years, I have seen our access to the back country severely diminished by all of these operations. This particular application covers an extremely well used snomobile area used by families for generations. We don't need another private company to take over a very popular general public winter playground.

Thank you for your consideration.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, May 26, 2015 5:11 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I have snowmobiled annually in this are since s.22 : and have a great time with friends here. I do not want to be eliminated from this are for heli skiing!! Snowmobiles do much more for the economy than heli skiing will ever do. Please add my name as a no vote for this heli skiing application.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, May 26, 2015 9:09 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I have had the pleasure of enjoying the beautiful wilderness that makes up Kokanee Park in all four seasons with both friends & family. My husband & I, s.22 often have visitors who come to the area to play for the same reasons we worked hard to make this area home. This nearby treasure is one that needs to be kept the way it is; and to encroach on its borders with the proposed heli-ski operation greatly puts this goal at risk. Even in the areas near the park boundary, we have enjoyed the sense of freedom & escape that we get from it being free of commercial operations, and this would be undermined by such as the proposed heli-ski setup.

There are already more than enough snowcat and heli-skiing tenures in the West Kootenays to meet the market demand. We should ensure there is enough wild space for wildlife, and places for self-propelled winter recreationists.

Thank you for allowing me to comment.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, May 27, 2015 12:15 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I DO NOT WANT THIS TO BE APPROVED I SNOWMOBILE AND SKI IN THIS AREA AND DON'T WANT IT TAKEN AWAY FROM MY FAMILY AND FRIENDS.
A BIG THUMBS DOWN.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, May 27, 2015 12:47 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

part 1 or 2

Dear Front Counter BC:

The West Kootenay EcoSociety is opposed to the recent application of Kootenay Heli-Ski Inc. for a heli-ski guiding operation, based out of Nelson, BC, file # 4405571. The Province must consider the effects of this proposed operation which directly borders the northern, eastern and southern boundaries of Kokanee Glacier Provincial Park. In particular, we have concerns regarding the cumulative effects of additional adjacent/overlapping commercial tenures on recreational users, sensitive wildlife and plant species. The West Kootenay EcoSociety is of the view that an additional helicopter-based operation will negatively affect our community's values, therefore the operation should be denied for the various reasons outlined below.

Although some may perceive that there are economic benefits of this proposed development. But one should not exclude a thriving tourism sector based primarily on non-mechanized backcountry use of pristine and undisturbed wilderness in the Nelson area. The presence of another commercial and, in this case, heli-access tenure will act as a very real barrier to recreational access for the general public. Regardless of the written rules and regulations allowing recreational users access to crown tenure lands, does not stop commercial operators from citing client-safety concerns to exclude or generally harass the public from their operating areas. The increased motorized noise pollution and disturbance that Nelson residents would be subjected to, coupled with a further loss of non-mechanized recreational opportunities, highlights the increased need for consensus-based land-use planning, prior to approving any further recreational developments adjacent to protected areas. Proposal!

s such as the one currently under consideration benefit only a few, while impacting a vast majority while threatening a well-established and core part of our local economy.

As outlined in the wildlife impact assessment completed by s.22 mountain goats, federally listed wolverine, grizzly bear, western toad, and various other listed species occupy habitats within the proposed tenure. In its application, Kootenay Heli-Ski Inc. has indicated its planned mitigation for mountain goats. Although The West Kootenay Ecosociety recognizes the willingness of Kootenay Heli-Ski Inc. to accommodate the concerns raised regarding impacts to this sensitive species, the mitigation proposed is based on only a one-day sample. Further long-term population habitat use and impact studies must be conducted to delineate the winter range of this population and the effectiveness of the mitigation measures being proposed.

The wildlife impact statement also briefly addresses impacts associated with increased human traffic, snow compaction and the building of landing zones. Removal of danger trees at landing zones and fuel caches will affect wildlife tree abundance and diversity, which also includes potential impacts to federally listed Whitebark pine, and possibly other listed, rare plant vegetation species, but were not surveyed for. No mitigations are provided for these many significant impacts.

Continued on part 2

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, May 27, 2015 12:48 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Continued From Part 2

The wolverine is a species of conservation priority within the province of BC and has been recognized nationally and internationally as a species requiring an increased effort to mitigate from human disturbance. Populations have been declining, while most remnant animals are found in parks and protected areas, and harvest quotas based on habitat models have apparently been set at unsustainable levels, relative to actual number of individuals remaining (as determined from DNA hair samples). Habitat fragmentation associated with multiple developments and disturbances is threatening to reduce animal movement and genetic diversity of the wolverine and other wide-ranging animals, yet these capacities and characteristics are vital for the long-term health and sustainability of these species. Compounding the habitat impacts are direct disturbance impacts to sensitive species, and the questionable mitigation that is being proposed to address the problem.

The operator, helicopter pilots and guests are being asked to look for animals and then avoid them, before they impact them. What is the likelihood that untrained viewers will (a) detect sensitive mountain goat, wolverine and grizzly bear, and (b) avoid them before these animals are disrupted and displaced? There is no evidence to suggest that such mitigation is effective, and that operators can comply, even if willing. If faced with decisions regarding accommodating their clients during unfavourable weather (snow, wind, fog, etc.), poor visibility, under sometimes marginal ski conditions, with limited options of where to go, it is unreasonable to expect that they will have the flexibility to comply, despite the best intentions.

The proposal makes no mention of how and where backcountry fuel stores will be cached and how human waste will be dealt with, and how these issues may affect sensitive alpine ecosystems. The high decibel level of helicopter travel will add to Nelson resident discomfort, and add to the number of complaints already received by the City and the Regional District of Central Kootenay regarding the noisy waterfront due to the airport, traffic congestion, construction, city works, highways, marina, the mall and other developments.

Kokanee Glacier Provincial Park is a treasured wilderness in our region and no further incremental development should be allowed to encroach on park boundaries while compromising the enjoyment of this serene place. Cumulative development impacts are growing due to increased development, traffic, and multiple users with overlapping land tenures. This park is already impacted by helicopter flights shuttling guests and supplies to Kokanee Glacier Cabin, Mountain Trek's recent recreation tenure along the eastern park boundary, ziplining, adjacent snowmobiling and ATV tours, and guided hiking and skiing in the areas. All of these activities are taking place immediately surrounding or within Kokanee Glacier Provincial Park. We challenge our government to act responsibly and pro-actively on behalf of our community, wilderness and biodiversity values, by saying no to this proposed development.

Sincerely,

The West Kootenay EcoSociety

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, May 27, 2015 2:07 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

As a resident^{s.22} and avid back country user I am apposed to this application for the following reasons:

1. There is already a huge number of commercial operations in the local mountains (10+). Some portion of the local back country must be reserved for self guided winter recreation. Self guided recreation provides revenue to local businesses through tourism, and increases the quality of life for local residents. High quality self guided recreation is the reason I live in s.22
2. The proposed tenure includes areas traditionally used for self guided winter recreation.
3. There is currently an "honour" system by which local back country users generally do not access terrain used by commercial operations. However if the number of commercial operations continues to grow this honour system will break down and conflicts between private citizens and commercial operations will dramatically increase.
3. Kokanee provincial park is a world class tourist attraction. Constant helicopter flights around the park will greatly diminish the wilderness experience for park users. A buffer zone with minimal human interference is required around the park to protect this precious resource.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, May 27, 2015 2:27 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

This area is frequented by myself and others in the winter months by snowmobiles, I wish not to see another area given to skiers only, plain and simple in my opinion they are already enough area's in the Kootenay region for back country skier's.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, May 27, 2015 8:53 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I do not support the Kootenay Heli-Ski application because of its detrimental impact on wildlife and the backcountry recreation currently enjoyed by locals and visitors in and around the tenure area, as well as on residents near the operation's flight path(s). The influx of heli-ski equipment, operators, and clients will introduce destructive noise and highly condensed human presence into otherwise wilderness areas, disrupting wildlife activity and vital denning sites as well as destroying the serene backcountry experience for non-motorized users of Kokanee Glacier Provincial Park and the surrounding wilderness. The areas bordering Kokanee Glacier Provincial Park need to be preserved as conservation buffer zones to enhance the Park's important role in providing safe habitat for wildlife and to protect its wilderness integrity for future generations. Furthermore, the proposed heli-ski operation will adversely affect wildlife and all homeowners near the flight path(s) to and !

from the drop-off points and the Nelson base with increased helicopter racket and the potential for fuel spills should fuel caches be required. There is too much at stake for virtually no defined benefit to the region, and in my opinion this proposal should not proceed.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Thursday, May 28, 2015 10:14 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Hello,

I've been reading about this over the last few weeks in the paper & social media, and each time I do, I don't feel right about helicopters in our back yard.

s.22 and I feel helicopters shouldn't be so close. There is already a few that fly over our house sometime, and you hear them for miles coming. I would not like more of them.

I know this will negatively impact wildlife, quality of life from noise pollution for many residents, impact back country skiers who already use the area and create pollution in proximity to a Provincial Park.

I strongly oppose having this tenure granted in that location.

Thank you.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, May 20, 2015 7:58 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Please accept this comment as a letter of support for this application.

Despite those that will be rallied to oppose this application not wanting anyone to have any access to our mountains, the fact is that heli skiing is likely the most environmentally friendly of any and all uses of the natural landscapes.

I find it hypocritical that many that oppose these items are also the ones that hike, bike, camp, and otherwise leave a much larger footprint than skiing on the snow surface.

As a business owner in the Nelson area I can state that the reduction in resource and government employment in this area leaves tourism as one of the primary economic drivers. Although heli skiing would likely be a very small market, every little bit helps, and I suspect those that can afford heli skiing usually will spend more than the average in our community, helping support businesses and hence local jobs directly and indirectly.

Respectfully,

s.22

Page 207 to/à Page 210

Withheld pursuant to/removed as

DUPLICATE

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 1, 2015 6:04 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Further to Lands File application # 4405571 whereby Kootenay Heli-Ski Inc has proposed for a License of Occupation for Adventure Tourism Heli-Ski Guiding purposes, please note that I have a concern and possible conflict with their proposal.

In their Mechanized Ski Guiding Management Plan dated March 2015 they state that "As this area is all remote backcountry we do not anticipate any additional traffic other than periodic resource-based activities."

Please note that some of their areas are presently accessed for backcountry skiing use by myself and others, and it is not as remote as they suggest in their report. Specifically I do backcountry tours in the south part of Sitkum Creek basin (even since the recent removal of bridge on Sitkum Creek) as well as tours in the West Kokanee Creek basin.

Although I am totally in favour of the heli ski concept that Kootenay Heli-Ski Inc. has proposed, it would be extremely disheartening and unfair to lose present crown land that we have historically used for backcountry touring, all for the reason that a company wants to earn revenue from those areas.

I realize that we cannot claim the areas to ourselves and I would like to make sure that if Kootenay Heli-Ski Inc. is granted a license to operate, they also cannot claim the proposed areas solely for their use. I am in favour of sharing any of the terrain that we presently tour in and would endorse a heli-ski license that will not prohibit our future backcountry use.

Alternatively, if a non-shared use is desired by them, I would suggest that further consultation with users such as myself is done and their boundaries are moved further into the backcountry to achieve the isolation that they state in their report. From my personal use, this would not result in them losing too much terrain and would simply involve staying further away from present road systems that are used for snowmobile accessed backcountry ski terrain.

Sincerely
s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 1, 2015 1:51 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

100% against !! I've been riding and exploring those areas most of my life. Nothing will stop me from continuing. This proposal makes me sick !!

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 1, 2015 12:23 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

We have enough tenured land here already. The Nelson Snowgoers have been using that area for years and maintain a cabin in the proposed tenure. There will be conflict between user groups. This is my local ski touring area and I would be very sorry to see this proposal go forward.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 1, 2015 12:05 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I think that this application should not go through , it infringes on highly used areas but other groups . both snowmobiler and backcountry users.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 1, 2015 11:04 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Why do we need another heli-ski operation?

This limits the area to this type of useage exclusively. I say that because once established, the operators always complain about other users and the trails through the snow being a safety concern.

Also, I would think this would be put on hold until the caribou issue is resolved. There may not be caribou in the area at this time (according to their information) but the area is surrounded by caribou and caribou closures. It only makes sense to strictly defer development until a regional plan for caribou management is in place.

I am not in favor of yet another heli-skiing operation in BC to have exclusive use of crown land. Thank you.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 1, 2015 10:31 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

There are already a lot of heli-ski operations in the area and in fact there is a heli-ski operation already very close to this proposed one. A proportionate amount of pristine back country must be left for other types of back country enjoyment like snowmobiling, telemark skiing. The lands closer to towns and cities should be left for outdoor enthusiasts and the less accessible areas should be for the heli-skiing. There are a lot of small businesses in BC that rely on these individual outdoor enthusiasts. As well, our "back yard" is quickly becoming inaccessible to our own taxpaying residents as these heli-ski operations fly a lot of non-residents up to a high class lodge in the mountains where they don't contribute to the local economy. British Columbians deserve reasonable access to their own province!

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 1, 2015 9:24 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

This is area we all need to use and not exclusive to MORE Heli skiing. The snowmobile world is outraged already at the area we loose to tenure ground. The Nelson snow goers have used the area up six mile for so many years and lots ride the crusader area off of this main line. Redfish is another area s.22 . These are areas I enjoy to ride and feel stripped of my rights if another permitt is granted. Look at all the ski operations around here, how many do we need. The power sport people are getting squeezed out. I vote no one the request.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 1, 2015 8:29 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

i am quite new to the recreation of snowmobiling but it seems to me that the space for snowmobiles is Getting more limited season by season and people drive from all over the province to access these zones. It seems that there is a Lot of tenures around here weither it is heli or touring or snowcat and it already feels kinda tense When there is interaction between everyone ... I don't think we need another place taken away It's one of the place.^{s.22}

s.22

And it's really important to me Thank you for your time^{s.22}

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 1, 2015 5:53 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

just wanted to voice my opinion. This is a terrible idea, I've been sledding up redfish and crusader for years. Redfish is one of the few zones that are safe to ride no matter the conditions. Not only is it a very popular sled location among locals. It's also one of the busier sled ski locations in the west kootenays. Please don't let this happen, I share the same opinion on this as a lot of people. Please let us avoid confrontation with these operators by denying there application.

Thanks for your time

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Wednesday, April 1, 2015 12:30 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

This proposal seems as though it was poorly researched as it sites minimal public use by motorized and non motorized users in proposed tenure areas. These areas are frequented by snowmobiles and ski tour enthusiasts, and boast some well loved terrain by many locals. There are several cabins on they areas indicated for this proposed tenure, that are cared for and respectfully used by recreational users. I take issue with their statement that the tenure will not impact public users as surely they will seek to limit this provided this tenure is approved. I also take issue with the large areas they are seeking in application as they steal known and used by locals and will affect many.

s.22

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Tuesday, March 31, 2015 10:21 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I s.22 have spent my whole life riding this area. It would be unjust to give an area such as this to someone for the sole purpose of creating a healthy pocket book for themselves when so many locals use and share this area.

s.22

May 29, 2015

To Jesse Lunan
Crownlands

Regarding:

Client: Kootenay Heli-Ski Inc.
Purpose: COMMERCIAL RECREATION/HELI SKI
Region: Kootenay, Cranbrook
Agency: Crown Land Allocation
File: #4405571

Mar 11, 2015

Location: North of Nelson, BC

Area (Hectares): 14,666

BCGS Mapsheet: 82F.064, 82F.074, 82F.084, 82F.094, 82F.095, 82F.085

Legal Description: Crown land approximately 30 km north of Nelson, BC between Slocan Lake and Kootenay Lake, bordering Kootenay Glacier Provincial Park

Application submitted for a Heli-Ski guiding operation, based out of Nelson, BC.

I am submitting objection to approval of this application for quite a number of reasons and may reference the *Wildlife Impact Assessment of march 2015* s.22 a number of times.

s.22 The Sitcum Creek drainage area 2007 wildfire was behind our property (and that of many others). The helicopter and firefighting flights were steady and necessarily intrusive. Post fire there were also helicopters dropping experimental hay bales for erosion suppression evaluation.

The Management Plan for this application is vague and unsatisfactory on flight path intrusion. It is vague to the point of non-existent and commits only to establish regular flight plans in order to lessen impact on wildlife. There has been no inclusiveness as to the impact on citizens with a projected 3 year capacity of 900 Client days and full capacity of 1300 Client days.

The Wildlife Impact Assessment and the Focal Species at Risk: the pages 15 to 30 details and recommendations are almost mind boggling and the proposal's solution is "All personnel involved in the heli-ski operations (guides, pilots, etc) should [my emphasis] learn to identify endangered wildlife species within the operating area and operate in such a manner that prevents behavioural changes to wildlife present....." So.... If they only "should", what if they don't? what of the customers' behaviors?.

In reference to Management Plan 2.1, 2 Staff (second to last paragraph) **"The pilot's main concern will be the safety and enjoyment of their clients."** This also appears to trump the concern for species at risk and/or environment.

Amongst the Impact Assessment is the recommendation "To minimize water pollution, ensure that all human waste is packed out or buried deep in snow at least 100m from water sources....." So..... who is going to ensure this happens? I assume it would include for the customers spread over the four polygons or those areas in use at any one time?

Back to the Wildlife Impact Assessment and observations of species present on one day, September 9, 2014. Of the 37 at risk species in the Kootenay Lake Forest Dist; 13 were observed on that one day but only 9 are "Extremely Unlikely" to be present. The report further states that "Additional impacts not addressed within the scope of this document are the cumulative impacts on wide-ranging species of multiple winter-use tenures & other land Management on the landscape" (pge 14).

Section 8 of the Management Plan notes they have "retained" s.22 to prepare operational strategies to minimize impact on mountain goats near the companies operating area. It further references "Appendix 3 Wildlife Mitigation Strategy" and says to go to page 20. **Page 20 loops back to the Wildlife Impact Assessment** so..... there is no genuine "Mitigation Strategy" to be found.

The 'in and out' day traffic is unacceptable. Management Plan 8.2 Atmospheric Impacts and Mitigation Strategy – two sentences that first acknowledge the high decibel helicopter traffic can cause wildlife & human distress, then, closes saying they have predetermined regular flight paths. So.... This is NOT a mitigation strategy and demonstrates absence of insight as to the damage potential to people, domestic animals, wildlife and the environment.

In closing, I can see no genuine commitment towards anything other than establishing a for profit business that promotes happy tourists to hopefully bring more money to Nelson. I believe there are a healthy number of businesses that are already tenured and who have on site facilities that are genuinely sensitive to mitigation of tourism's negative impact in our back country. Those values are a must and I don't see that in this proposal. Denial is requested.

s.22

Lunan, Jessie FLNR:EX

From: s.22
Sent: Monday, May 25, 2015 10:37 PM
To: Lunan, Jessie FLNR:EX
Cc: s.22
Subject: File #4405571 With regard to Heli-Ski Licence Application of Kootenay Heli-Ski Inc (KHS)
Attachments: Trans.FWKP Heli Ski Submission.pages.pdf

Dear Madam:

Please find attached in the form of a .pdf file the opinion of the Friends of West Kootenay Parks (FWKP) with regard to the application of KHS to operate a heli-ski business out of the City of Nelson. I have tried in several ways to get this document to the BC Ministry of Forests, using both the prepared format on your web site and by a direct email to the Land Tenures Branch, but so far without any certainty that this document has been received. I obtained your email address from a member of the Kootenay Mountaineering Club, so I hope that you can both acknowledge receipt of this email and the attached document and also forward it to the relevant office within the Ministry whose job it is to deal with submissions from the public concerning this application.

Yours truly

Maurice de St Jorre
VP, Friends of West Kootenay Parks

Friends of West Kootenay Parks (FWKP)
Submission with Regard to Heli-Ski Licence Application of Kootenay Heli-Ski Inc. (KHS)
File #4405571

Introduction

The FWKP has been active for over three decades in the West Kootenay, working to improve access to and the amenities of all Provincial parks in our area. At the same time we have worked to ensure that this has been done in an ecologically sound and sustainable way, seeking to preserve their essential wilderness nature. This, together with preserving the historical heritage of man's interaction in the area, has been our mandate.

Heli Ski Proposal

Our understanding of the proposal is that over the months of December through April each winter, the proponent would operate helicopters based in Nelson on a daily basis, catering to the bottom end of the heli-ski market, effectively selling "daily lift tickets" with some guiding to about 15,000 ha. of wilderness terrain on the Northern, Western and Southern edges of Kokanee Glacier Provincial Park (the Park). They anticipate selling about 1300 of these tickets per season. If one assumes their operating season is 120 days, then they will have roughly 10 to 12 customers per day which will require the operation of 2 A-Star machines or one much larger aircraft. Either way, the noise of this operation is going to impact not only those in Nelson, but also all those living under the flight path and to a lesser, but not negligible extent, those using the Park for non-motorized winter recreation.

This area is contiguous to the Park boundaries to the North, West and South sides of the Park and surrounds about 50% of its entire perimeter. In effect, the Park serves as an adjunct to this area which will prevent any future competition, while at the same time severely impacting anyone who wishes to use the Park terrain for the non-motorized winter use. Local residents and numerous visitors have been using the Park in this manner for decades.

The proposal is unclear on whether or not KHS will establish refuelling depots within their operating area, but if they do not, then that means even more flights between Nelson and the operating areas, and if they do, then there will be caches of jet fuel scattered around the park boundaries with all the foreseeable risks that this involves. We have already seen the results of tanker trucks carrying helicopter jet fuel winding up in local creeks, such as the incident in 2013 at Lemon Creek.

Evaluation

The proposal basically is without merit, from either an economic or environmental perspective.

Economic impact:

a) The major cost of the business is naturally that of helicopter operation. Where does this money go? A significant part of this is for fuel and repair parts which leave no trace in the Nelson community. The helicopter crews' wages (pilots and mechanics) and those of the guides

may or may not wind up in the community depending on whether or not these individuals are locals. This leaves the proponents' profits over which nothing can be forecast.

b) The money that will be generated from KHS customers spent on local accommodation, food and services is made to appear as a major economic benefit. This is true only if these ten to twelve daily customers fill places that would otherwise be left vacant. KHS does not provide any statistics that this is the case. If one's business model is to aim for the bottom of the market to those who cannot afford the more conventional heli- and cat-ski operations, it is unlikely that these individuals are going to be big spenders locally after paying for their expensive lift ticket.

c) On the negative side, Nelson's other winter visitors who come here for skiing at the Whitewater resort, or for the quiet serenity of the cross country trails and the back country, they will be subjected to the near continual clatter of helicopters. Without knowing precise statistics, there is little doubt that these groups will far outnumber KHS customers.

d) The non-mechanized back country ski lodge in the Park, operated by the Alpine Club of Canada, will be affected by this proposal. It is renowned as one of the best (in all respects) and most affordable of such lodges in Canada, and its affordability is predicated on full occupancy. Continuous helicopter activity along its western boundary has to detract from the wilderness experience of its customers and will thus impact its operational economics detrimentally.

Environmental Impact:

a) We do not believe one can simply look at the precise areas of the proposed tenure. The whole area of the Park, these adjacent 15,000 ha. and the flight paths to and from Nelson are going to be impacted. The animal species, endangered or not, are going to see and hear both these helicopters and their cargoes of skiers. This puts yet another source of pressure on these species that does not currently exist. It is disingenuous to suggest that somehow that wild animals will adapt to flight paths if these are used repeatedly and that if goats are spotted, particular landing sites will be temporarily left unused. Wildlife are universally scared of helicopters and, with no one to police site use (and given the near invisibility of goats against snow), the probability of any landing or pick up site being shut down is close to zero. Wildlife cannot recognize the Park boundaries.

b) If approved, this proposal will further fragment an already over fragmented piece of the Southern Interior BC wilderness. Enough of the BC back country has already been blocked out for mechanized skiing that at some point a halt must be called to its further expansion.

c) There is also an environmental cost associated with the open ended nature of the proposal. As written, the plan envisions a daily head count of around 10 skiers, which may be the result of a market survey or just guess work. However, the reality is that it may well be much more, given that the market size of any economic endeavour expands with reducing cost. Unlike back country ski lodges of all types which are limited by their licenced capacity, and therefore by the number of mechanized trips, KHS can simply add more helicopters if the market demand is there without incurring any additional capital cost. Two A-Stars flying daily is not the worst case scenario.

Conclusion:

This proposal will open the bottom end of the heli-ski market in the Nelson area at minimal financial risk or cost to the proponent, but at a major cost of environmental impact to both wildlife and Nelsons' residents and visitors. There will be little economic benefit to our area, with at least the possibility of this impact being negative. The environmental effect is totally negative.

- mnewell@rdck.bc.ca

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- Back-country touring
- Fishing
- Camping
- Huckleberry picking
- Hunting
- Trapping
- Prospecting

Of concern to us, are the many types of users and an apparent absence of collective stewardship.

Access to the watershed by all the recreational users has been made easy by the logging activities, which have been present in one way or another in the watershed for the past century. Recently, logging has ramped up and is currently using large industrial machinery to clear cut large sections in a way that is broadly considered unsustainable by industry and environmentalists alike. Once again, our emphasis is caution and we want to bring awareness to the lack of oversight that would consider the watershed as a holistic ecosystem and that its natural balance is at risk of serious compromise; potentially leading to watershed exhaustion. We are looking for assurance that this is not the case.

In the heli-ski application we notice a reference to avalanche control assessment, but documentation is conspicuously absent in the application. The backcountry of Duhamel creek, especially near the four lakes at its source, is already an area of high risk of frequent, naturally occurring avalanches. Logging in the area increasingly compromises slope stability. We wonder whether there has been an assessment regarding heli-noise and its affect on steep, snowladen valley banks? Climate change predictions in the West Kootenay point to increased precipitation during the non-summer months.⁴ What would happen if a major avalanche were to reach the lakes and displace all that water? Where would that water go?

These are big questions and, wildlife corridors have not yet entered into the discussion. We are aware that our Regional District Representative, Tom Newell has submitted written objection to the lack of public process that has taken place regarding this application. We echo his concerns. A concerted effort to discuss impacts of this business venture upon local residents is crucial. Open discussion often illuminates concerns, or benefits, that may be missed if the discussion doesn't take place.

Once again, we have serious concerns about an application to operate yet another activity in our watershed in the absence of collective stewardship and without due process of public information and discussion⁵.

Sincerely,

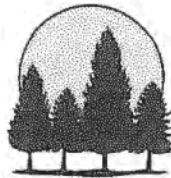
s.22

for,

Duhamel Watershed Society, www.duhamelwatershedsociety

⁴ http://www.cbt.org/Initiatives/Climate_Change/

⁵ Regional District of Central Kootenay, Electoral Area 'F' Official Community Plan bylaw No. 2214, 2011 Sec.19.0 Crown Land.



WEST KOOTENAY

EcoSociety

May 26, 2015

Front Counter BC
1902 Theatre Road
Cranbrook, BC
V1C 7G1

Dear Front Counter BC:

The West Kootenay EcoSociety is opposed to the recent application of Kootenay Heli-Ski Inc. for a heli-ski guiding operation, based out of Nelson, BC, file # 4405571. The Province must consider the effects of this proposed operation in directly bordering the northern, eastern and southern boundaries of Kokanee Glacier Provincial Park. In particular, we have concerns regarding the cumulative effects of additional adjacent/overlapping commercial tenures on recreational users, sensitive wildlife and plant species. The West Kootenay EcoSociety is of the view that an additional helicopter-based operation will negatively affect our community's values, therefore the operation should be denied for the various reasons outlined below.

Although some may perceive that there are economic benefits of this proposed development, there already exists a thriving tourism sector in the Nelson area, which is based primarily on non-mechanized backcountry use of pristine and undisturbed wilderness. The presence of another commercial and, in this case, heli-access tenure will act as a very real barrier to recreational access for the general public. Regardless of the written rules, regulations allowing recreational users access to Crown tenure lands does not stop commercial operators from citing safety reasons or client-harassment concerns to exclude the public from their operating areas. The increased motorized noise pollution and disturbance that Nelson residents would be subjected to, coupled with a further loss of non-mechanized recreational opportunities, highlights the increased need for consensus-based land-use planning now, prior to approving any further recreational developments adjacent to protected areas. Proposals such as the one currently under consideration benefit only a few, while impacting the tranquillity of the vast majority and threatening a well-established and core part of our local economy.

As outlined in the wildlife impact assessment completed by Doris Hausleitner, mountain goats, federally listed wolverine, grizzly bear, western toad, and various other listed species occupy habitats within the proposed tenure. In its application, Kootenay Heli-Ski Inc. has indicated its planned mitigation for mountain goats. Although The West Kootenay EcoSociety recognizes the willingness of Kootenay Heli-Ski Inc. to exclude an area to accommodate the concerns raised regarding impacts to this sensitive species, the mitigation proposed is based on only a one-day sample, and further long-term population habitat use and impact studies must be conducted to delineate the winter range of this population and the effectiveness of the mitigation measures being proposed. As stated, the increased human traffic, snow compaction and building of landing zones will impact riparian areas and removal of danger trees at landing zones will affect wildlife tree abundance and diversity, including potential impacts to federally listed whitebark pine, and possibly other listed plant communities and vegetation species that are rare, but were not surveyed for. No mitigations are provided for these many significant impacts.

The wolverine is a species of conservation priority within the province of BC, nationally and internationally. Populations have been declining, most remnant animals are found in parks and protected areas, and harvest quotas based on habitat models have apparently been set at unsustainable levels, relative to actual number of individuals remaining (as determined from DNA hair samples). Habitat fragmentation associated with multiple developments and disturbances is threatening to reduce animal movement and genetic diversity of the wolverine and other wide-ranging animals, yet these capacities and characteristics are vital for the long-term health and sustainability of these species. Compounding the habitat impacts are direct disturbance impacts to sensitive species, and the questionable mitigation that is being proposed to address the problem. The operator, helicopter pilots and guests are being asked to look for animals and then avoid them, before they impact them. What is the likelihood that untrained viewers will (a) detect sensitive mountain goat, wolverine and grizzly bear, and (b) avoid them before these animals are disrupted and displaced? There is no evidence to suggest that such mitigation is effective, and that operators can comply, even if willing. If faced with decisions regarding accommodating their clients during unfavourable weather (snow, wind, fog, etc.), poor visibility, under sometimes marginal ski conditions, with limited options of where to go, it is unreasonable to expect that they will have the flexibility to comply, despite the best intentions.

The proposal makes no mention of how and where backcountry fuel stores will be cached and how human waste will be dealt with, and how these issues may affect sensitive alpine ecosystems. The high decibel level of helicopter travel will add to Nelson resident discomfort, and add to the number of complaints already received by the City and the Regional District of Central Kootenay regarding the noisy waterfront due to the airport, traffic congestion, construction, city works, highways, marina, the mall and other developments.

Kokanee Glacier Provincial Park is a treasured wilderness in our region and no further incremental development should be encroaching to the park boundaries and compromising enjoyment of this serene place. Cumulative development impacts are growing due to increased development, traffic, and multiple users with overlapping land tenures. This park is already impacted by helicopter flights shuttling guests and supplies to Kokanee Glacier Cabin, Mountain Trek's recent recreation tenure along the eastern park boundary, ziplining, adjacent snowmobiling and ATV tours, and guided hiking and skiing in the areas immediately surrounding Kokanee Glacier Provincial Park. We challenge our government to act responsibly and pro-actively on behalf of our community, wilderness and biodiversity values, by saying no to this proposed development.

Sincerely,

A handwritten signature in cursive script that reads "David Reid".

David Reid,
Executive Director

Operator Input Form

Company Name of the Existing Adventure Tourism Operator
Rocky Tour Adventure Ltd., PO Box 169, Silverton, BC V0G 2B0

Crown Land Tenure No. 4404247

1. ***With respect to the areas of overlap will this applicant's proposed activities affect the way in which you currently operate on the ground?***

Yes.

From the mapping provided we cannot determine where the applicant proposes to place the ski runs nor can we determine where the drop off versus pick up points are. What is clear is that there are a lot of landing locations in within the areas which we think are overlapping.

This brings us to another comment about the mapping. There are no coordinates on the mapping at all so we are only guessing at where this proposal might overlap with our existing tenure.

Undoubtedly there will be overlap with areas where our clients are snowmobiling. The dangerous part about overlapping tenures between ski operators and snowmobile operators is that skiers are heading downhill at quite a quick pace while we are traversing in the valley bottom or going uphill.

We would have to proceed with extreme caution to ensure no collisions occur which would lessen the enjoyment of our guests. Even being cautious may be quite difficult as we snowmobile in the trees and they ski in the trees.

It has also been our experience in areas where we have overlapping tenure with ski operators, that there are conflicts because of lack of acceptance by the skiers towards the snowmobilers. Even with joint use agreements, the ski guides often approach us and ask us what we are doing there in a rather aggressive fashion. This is uncomfortable for our guests.

Are there ways in which both you and the applicant could operate within this area of overlap which would eliminate or minimize any changes to your current operation? For example operating at different times, using different area for activities that are not compatible, etc.

No.

According to the Ministry of FLNR's matrix for compatibility of overlapping tenures where an existing tenure is for snowmobiling activities and the new applicant is proposing heli-ski activities, the activities are deemed to be non-compatible.

We have always been strong believers that different sport groups can co-exist in the backcountry and that it is not necessary to zone areas for specific uses. However, it has also been our experience that the ski community is not at all tolerant of snowmobilers.

We are operating during the same months as the proponent intends to operate. We make a decision about where to go in the morning of the day of the ride, based on snow conditions, weather and importantly avalanche hazard. We cannot operate snowmobile tours in the summer.

The proponent does not appear to recognize that we are operating a winter activity. Quote from page 15 "Licensed Guide Outfitters operate primarily during the spring, summer and fall of each year therefore, conflicts with heli skiing are deemed to be minimal."

It appears the proponent has not done his homework.

2. *With respect to the areas of overlap, will this applicant's proposed activities affect the kind of experience that you currently offer to your guests?*

Yes

If this tenure is granted there will be substantial traffic in the areas where we are now operating. Our existing snowmobile tenure was well thought through to ensure that we did not "overutilize" any one area. We wanted our guests to have a different experience than can be attained at most of the mainstream snowmobile destinations. The experience here is of low volume traffic which equates to a more pristine riding opportunity. Quoting from our Management Plan – "The impact on the land base is kept to a minimum by infrequent utilization of the areas and restricting the size of the groups. To keep the experience unique, we need to have numerous areas to utilize in order that we can offer fresh untouched powder as often as possible."

With the volume of traffic that the applicant is proposing and the inevitable complaints from the skiers about the snowmobile tracks, our guests' experience will be negatively impacted.

Are there ways in which both you and the applicant could operate within this area of overlap which would eliminate or minimize any changes to the experience you currently offer your guests? Please list.

We would recommend that Kootenay Heli-Ski apply in an area close to Nelson where there might be overlap with another ski operator. This would make for a much more compatible arrangement. There would be no discussion about tracked up hillsides.

In fact, as a general comment, it is interesting to note that, at least to the best of my knowledge, are no overlapping ski tenures even when there are a multitude of operators. In fact, I read on one of CMH's applications to change existing tenure boundaries that the reason they were requesting the change jointly with another ski operator was because it is against the Heli-Ski Association's charter to apply for tenure where another ski tenure already exists.

However, they don't seem to have any problem applying where commercial recreation tenure of another sporting activity already exists!

3. *With respect to the areas of overlap will this applicant's proposed activities affect the level of risk and/or liability faced by your guests and/or business?*

Yes.

Put quite simply, our guests will be riding on roads at the bottom of the valley or climbing up the hillside often through the trees.

The applicant's guests will be skiing down the hill through the trees and out onto the road.

The potential for collisions is significant

Are there ways in which both you and the applicant could operate within this area of overlap which would eliminate or minimize any changes to the level of risk and/or liability faced by your guests and/or business?

No.

4. *With respect to the areas of overlap, will this applicant's proposed activities affect the scope and scale of public recreational use of the area?*

Yes.

There is significant use for recreational purposes in these areas by the public both in the summer and the winter. Both snowmobilers and back country skiers enjoy and recreate within the areas the applicant has proposed.

Again, because the mapping does not include any coordinates or roads, it is difficult to determine for certain where the applicant wishes to place the ski runs but where the boundaries are. In any event, there is substantial overlap with an area where the Nelson Snogoers are grooming roads and have an established cabin, both under agreement with the Dept of Forests.

Kootenay Heli-Ski has not done enough research if they are not aware of this overlap. It certainly is not mentioned in their management plan. In fact they state that there is minimal public use in these areas. They are either poorly informed or perhaps they have chosen to downplay the level of use by the public?

Are there ways in which both you and the applicant could operate within this area of overlap which would eliminate or minimize any changes to the scope and scale of public recreational use of the area?

We are already doing our part by practising minimal use in order to not disrupt public recreational use of the area. Again, with the 2000+ client days proposed it would be hard to argue that there will be no or even minimal impact in the scope and scale of public use.

5. *Are there any concerns related to activities which would occur outside your tenure boundaries? If so, please explain.*

Our concerns related to activities which would occur outside our tenure boundaries are the same as those relating to activities within our tenure boundaries.

We also do not believe that there is a need for more mechanized skiing in the area. Look on the tenure maps in the FLNR office and we are sure you will note that there is very little area that is not tenured in the West Kootenay. Without looking at such a map, we can list the following ski operators within the West Kootenay:

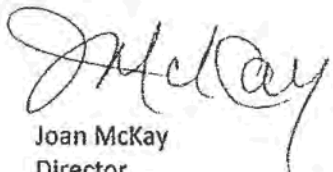
CMH – several tenures
Halcyon Hot Springs – tenure is perhaps under another name
Stellar Heli-skiing
Snowwater Heli-skiing
Valhalla Powdercats
Baldface
Retallack
Ice Creek
Selkirk Wilderness
Great Northern
White Grizzly

In addition, there are 3 or 4 operators on the northern cusp of the West Kootenays, in Revelstoke.

The management plan as presented is a very attractive document but does not contain anything of substance and the maps are lacking the level of detail required to make an informed judgement of where and what the applicant is proposing.

With the abundance of ski tenures as noted above, the areas which the applicant has applied for are virtually the only areas left in this region where snowmobilers are welcome. We need to keep these areas free of ski tenures.

We do not agree with this application.



Joan McKay
Director
Rocky Tour Adventures Ltd.

Lunan, Jessie FLNR:EX

From: FCBC Cranbrook FLNR:EX
Sent: Wednesday, June 3, 2015 9:06 AM
To: Lunan, Jessie FLNR:EX
Subject: FW: kootenay heliski application for tenure File: #4405571
Attachments: 0529KtnyHeli.docx

Good morning,

Please see attached comments for ATS project number: 167780

Thank you,

-Mel

From: FrontCounter BC FLNR:EX
Sent: Monday, June 1, 2015 9:30 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: kootenay heliski application for tenure File: #4405571

Comments for processing.

From: Craig Pettitt s.22
Sent: Friday, May 29, 2015 4:30 PM
To: FrontCounter BC FLNR:EX
Subject: kootenay heliski application for tenure File: #4405571

Dear Front Counter:

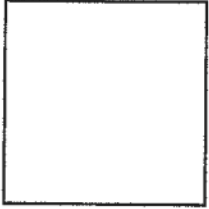
Please find attached our review and comment of **Mechanized Ski Guiding Management Plan** For Kootenay Heli-Ski Inc.
File: #4405571.

Sincerely,

Craig Pettitt, Director

Valhalla Wilderness Society

s.22



This email has been checked for viruses by Avast antivirus software.
www.avast.com



Valhalla Wilderness Society

Box 329, New Denver, British Columbia, Canada V0G 1S0

Phone: (250) 358-2333, Fax: (250) 358-2748, E-mail: vws@vws.org, Web: <http://www.vws.org>

May 29 2015

Comments on the Mechanized Ski Guiding Management Plan for Kootenay Heli-Ski Inc. (File: #4405571)

Front Counter BC
1902 Theatre Road
Cranbrook, BC
V1C 7G1
FrontCounterBC@gov.bc.ca

Dear Front Counter BC:

Please be advised that the Valhalla Wilderness Society is opposed to any further commercial recreation tenures in the West Kootenay Backcountry. It is not appropriate to keep issuing permits to a point of "what the market will bare". This blindly ignores the plight of our wildlife. The number of species that are blue listed in this region indicates that we've already gone too far. There has been no attempt to use Limits to Acceptable Growth (LAC) for human recreation activities and associated disturbance or to incorporate human disturbance thresholds to limit impacts to wildlife. Also the current government policy of allowing commercial operators to regulate themselves is unacceptable and is in contradiction of good environmental stewardship. This government continues to lay off Conservation Officer Staff, MFLNRO staff and MOE staff then pleads that it hasn't the staff or the funds to ensure that sound environmental stewardship is taking place. This is happening to such an extent that the Heliski industry in BC is basically unregulated. Virtually no significant government physical monitoring of the industry is taking place beyond review of the paperwork. Regardless of pledges to exceed best management practises there are many reports from employees within the industry that when there are paying customers available and the weather is poor management guidelines are disregarded in order to provide safe flights to the powder fields. Below we will identify our concerns with the various sections of this application.

2.0 Description of the Operation and Activities Offered

The proponent intends to operate out of Nelson and fly from the Nelson airport. This will increase the noise pollution that residents and visitors to Nelson will be subjected to. Based on optimum numbers and 12 person flight capacity of a medium helicopter this would increase helicopter flights to and from the Nelson airport by 216 flights a season. This will have a significant impact on residents across the lake from the airport and those along the flight paths to various ski areas. This noise impact will degrade the “amazing beauty and grandeur of the Kootenays that are a natural draw for tourists”.

3.0 Description of Operating Area and Zones

The proponents operating area surrounding the northern, eastern and southern boundaries of Kokanee Glacier Park (KGP) is also home to a growing population of backcountry recreation enthusiasts. The proponent is under the misconception that this is all remote backcountry. In fact the majority of the creek valleys surrounding KGP are accessible back country and significant winter back country recreation takes place in numerous of these valleys. It is a misconception to premise their heliski operation on the fact the majority of industry, recreation and wildlife are dormant in the winter.

Zone 1 Long Creek

Use of this area will have noise impacts on the commercial back country operator at Mt. Carlyle Basin at the head of Long and Carpenter Creeks as well as backcountry skiers using the headwaters of Silverton, Fennel, and Maurier Creeks.

Zone 2 Arlington Basin

This area experiences heavy snowmobile use particularly the south western section but also the Enterprise and Timber Creek drainages. Not only is there an active trapline in Timber Creek but also the area is extensively used by backcountry skiers. Helicopter landing pads are on KGP boundary and would probably require a park use permit. These landing pads will have noise impacts on backcountry skiers using the park as well as Slocan Chief cabin.

Zone 3 Cornfield

Use of this drainage will have significant noise impacts on residents living along the west arm of Kootenay Lake. There are several helicopter landing pads on or within KGP boundary and would probably require a park use permit.

Zone 4 Outlook

Use of this zone will have significant noise impacts on residents living along the west arm of Kootenay Lake. There are several helicopter landing pads on or within KGP boundary and would probably require a park use permit.

4.0 Improvements

All helicopter landing pads should be inspected by MoFLNRO personal to ensure minimal tree cutting is done and adequate slash disposal is carried out. Technicians should ensure that any spruce trees that are cut are adequately treated to prevent the start or spread of a spruce bark beetle infestation.

7.0 Impacts on Other Users &

KHS fails to adequately recognize and address the significance of the noise impacts created by helicopter flights in and about our communities so that a minority group can enjoy some high priced recreation. Pre determined flight paths do not mitigate the noise experienced by the public. The Whop – Whop – Whop noise of helicopters at high elevations carries substantial distances and the proposed

tenure of KHS is not very far removed from communities and residences. Especially when Zones 3 and 4 are being used the noise will carry downstream to residences on the Kootenay Lakeshore. But use of all zones will affect the enjoyment of other winter backcountry users within a thirty kilometer radius. Not only that but the Heli ski industry in BC is extremely fossil fuel dependent and as a result a very high emitter of greenhouse gases all done for the sake of recreation, a very indulgent and nonessential use. This industry should have to pay a substantial carbon tax to continue its flagrant use of fossil fuels.

8.0 Fish, Wildlife and Environmental Values

8.1 Wildlife

Despite the relatively small wilderness area bounded by Kootenay Lake, Kootenay River, Slocan River and Lake and Kaslo River a small grizzly bear population still inhabits the area despite the existing commercial resource activity and habitat destruction. How much commercialization can occur before a tipping point is reached and this population disappears?

Grizzly Bear

KHS offers no strategy in this proposal for identifying grizzly bear denning sites and subsequent avoidance. With the aid of a helicopter these denning sites are easy to find in early November when snow is on the ground and in many instances may be located on KHS's higher elevation southerly exposed ski runs. These denning areas should be located, mapped, and avoided during winter operations.

Wolverine

As with the grizzly bear KHS needs to be proactive and identify where wolverine denning sites are and then avoid them in their winter operations.

Mtn Goat

KHS says all the right things regarding a mitigation strategy for mountain goat but many of the valleys that KHS proposes to access for heliskiing are barely 2km wide at their summits hence flying down the middle of the valley places them less than 2 km from valley walls and potential mountain goat habitat. Also during flat light and in stormy weather pilots fly close to valley walls and tree tops for visual definition. Safety trumps wildlife mitigation all the time and hence our wildlife continues to suffer. An ongoing program needs to be developed to identify and map occupied winter goat habitat and determine whether a 2 km flight buffer can be established and if not these valleys need to be avoided. Also in valleys that have occupied goat habitat and adequate flight buffers an exit strategy needs to be in place so that the goats are not disturbed during the exit.

8.3 Possible Aquatic Impacts and Minimization Strategy

Burying human waste deep in the snow where it is held frozen until spring thaw and runoff does very little to minimize the effects of human excrement. The outdoor recreation industry has developed cheap light weight porta-potties that can easily be transported in the cargo bay of a helicopter. These should be required to be used by the Heliski industry as this industry is responsible for bringing large numbers of people into remoteback country areas which otherwise would rarely if ever see people in the headwater regions of our creeks and rivers with the subsequent threat of disease infestation.

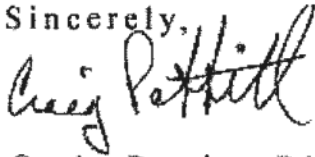
Conclusion

During the last twenty years we have seen mountain caribou become blue listed, red listed and federally listed as threatened; grizzly bear have been blue listed, wolverine have been blue listed, and mountain goat have been yellow listed. In every instance habitat destruction and disruption are the primary cause. The increased presence of humans is increasing the stress level in animals and robs them of critical energy that they need for survival in the harsh winter environment. The habitat that animals are using is what they find is most critical for their current needs and increased human occupation of these areas is

forcing these animals into areas of poorer habitat requirements. The number of species that are blue listed in this region indicates that we've already gone too far. There has been no attempt to use Limits to Acceptable Growth (LAC) for human recreation activities and associated disturbance or to incorporate human disturbance thresholds to limit impacts to wildlife.

The VWS opposes this application for tenure for the reasons that we have cited above and we urge Front Counter BC not to grant this tenure.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Pettitt". The signature is fluid and cursive, with the first name "Craig" written in a larger, more prominent script than the last name "Pettitt".

Craig Pettitt, Director
Valhalla Wilderness Society

10/18/2015
10/18/2015

Christensen, Cathy FLNR:EX

From: info@ecosociety.ca on behalf of s.22 via The West Kootenay EcoSociety
<info@ecosociety.ca>
Sent: Wednesday, May 27, 2015 9:03 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Wednesday, May 27, 2015 - 20:03

s.22

Comments:

I live in the Sitkum drainage and oppose the Kootenay Heli Ski Inc application. The letter below describes my concerns, but I also do not want helicopter traffic over my house and watershed during the winter as I feel my own comfort level will be impacted with this tenure.

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

The following points describe my major concerns:

A commercial recreation tenure will act as a barrier to general public access. Regulations aside, commercial operators may harass the general public or cite safety issues to exclude the public. Increased noise and the further loss of public recreational areas again demonstrate the need for a land use plan in the lands surrounding Kokanee Glacier Provincial Park.

The wildlife impact assessment by s.22 raised concerns about the effects of the proposed tenure on wildlife including: mountain goats; wolverines; and listed amphibians, reptiles and birds. Further study is needed to determine the full extent of mountain goat usage in the proposed areas. Wolverines are a species of conservation priority in BC, in Canada and internationally. The high decibel level of helicopter travel may negatively affect mountain goat, wolverine and grizzly bear behaviour. In addition, increased human-animal interactions may negatively affect a wide variety of wildlife species in the proposed areas.

s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

Kokanee Glacier Provincial Park is experiencing increased cumulative affects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of a cumulative impacts study of existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: info@ecosociety.ca on behalf of s.22 via The West Kootenay EcoSociety
<info@ecosociety.ca>
Sent: Wednesday, May 27, 2015 8:56 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Wednesday, May 27, 2015 - 19:56

s.22

Comments:

I am writing to advise you that I am adamantly against having a heli ski operation in Kootenay Glacier Park. My reasons are outlined below.

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

The following points describe my major concerns:

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s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

Kokanee Glacier Provincial Park is experiencing increased cumulative affects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of a cumulative impacts study of existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Friday, May 29, 2015 9:22 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Thursday, May 28, 2015 5:59 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 17:59

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

The following points describe my major concerns:

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s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

Kokanee Glacier Provincial Park is experiencing increased cumulative affects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of a cumulative impacts study of

existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Friday, May 29, 2015 9:21 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Thursday, May 28, 2015 7:36 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 19:36

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

The following points describe my major concerns:

A commercial recreation tenure will act as a barrier to general public access. Regulations aside, commercial operators may harass the general public or cite safety issues to exclude the public. Increased noise and the further loss of public recreational areas again demonstrate the need for a land use plan in the lands surrounding Kokanee Glacier Provincial Park.

The wildlife impact assessment by s.22 raised concerns about the effects of the proposed tenure on wildlife including: mountain goats; wolverines; and listed amphibians, reptiles and birds. Further study is needed to determine the full extent of mountain goat usage in the proposed areas. Wolverine is a species of conservation priority in BC, in Canada and internationally. The high decibel level of helicopter travel may negatively affect mountain goat, wolverine and grizzly bear behaviour. In addition, increased human-animal interactions may negatively affect a wide variety of wildlife species in the proposed areas.

s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

Kokanee Glacier Provincial Park is experiencing increased cumulative affects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of a cumulative impacts study of

existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Friday, May 29, 2015 9:20 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

-----Original Message-----

From: info@ecosociety.ca [<mailto:info@ecosociety.ca>]
Sent: Thursday, May 28, 2015 10:35 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 22:34

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

*There is an abundance of cat and heli ski operators in the area already- This part of the province shouldn't be carved up any further for commercial, mechanized operators.

The following points describe my major concerns:

A commercial recreation tenure will act as a barrier to general public access. Regulations aside, commercial operators may harass the general public or cite safety issues to exclude the public. Increased noise and the further loss of public recreational areas again demonstrate the need for a land use plan in the lands surrounding Kokanee Glacier Provincial Park.

The wildlife impact assessment by s.22 raised concerns about the effects of the proposed tenure on wildlife including: mountain goats; wolverines; and listed amphibians, reptiles and birds. Further study is needed to determine the full extent of mountain goat usage in the proposed areas. Wolverine is a species of conservation priority in BC, in Canada and internationally. The high decibel level of helicopter travel may negatively affect mountain goat, wolverine and grizzly bear behaviour. In addition, increased human-animal interactions may negatively affect a wide variety of wildlife species in the proposed areas.

s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

Kokanee Glacier Provincial Park is experiencing increased cumulative affects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of a cumulative impacts study of existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Friday, May 29, 2015 9:18 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

-----Original Message-----

From: info@ecosociety.ca [<mailto:info@ecosociety.ca>]
Sent: Friday, May 29, 2015 6:46 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Friday, May 29, 2015 - 06:46

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

The following points describe my major concerns:

A commercial recreation tenure will act as a barrier to general public access. Regulations aside, commercial operators may harass the general public or cite safety issues to exclude the public. Increased noise and the further loss of public recreational areas again demonstrate the need for a land use plan in the lands surrounding Kokanee Glacier Provincial Park.

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s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

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existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Friday, May 29, 2015 9:15 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Categories: Red Category

Comments for processing.

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Friday, May 29, 2015 7:35 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Friday, May 29, 2015 - 07:35

s.22

Comments:

We are taking up so much space in our province: it's the tough decision but we need to keep our wilderness areas wilderness areas. There aren't that many of them. I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

The following points describe my major concerns:

A commercial recreation tenure will act as a barrier to general public access. Regulations aside, commercial operators may harass the general public or cite safety issues to exclude the public. Increased noise and the further loss of public recreational areas again demonstrate the need for a land use plan in the lands surrounding Kokanee Glacier Provincial Park.

The wildlife impact assessment by s.22 raised concerns about the effects of the proposed tenure on wildlife including: mountain goats; wolverines; and listed amphibians, reptiles and birds. Further study is needed to determine the full extent of mountain goat usage in the proposed areas. Wolverine are a species of conservation priority in BC, in Canada and internationally. The high decibel level of helicopter travel may negatively affect mountain goat, wolverine and grizzly bear behaviour. In addition, increased human-animal interactions may negatively affect a wide variety of wildlife species in the proposed areas.

s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

Kokanee Glacier Provincial Park is experiencing increased cumulative affects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of a cumulative impacts study of existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Thursday, May 28, 2015 5:15 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Thursday, May 28, 2015 4:11 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 16:10

s.22

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

The following points describe my major concerns:

A commercial recreation tenure will act as a barrier to general public access. Regulations aside, commercial operators may harass the general public or cite safety issues to exclude the public. Increased noise and the further loss of public recreational areas again demonstrate the need for a land use plan in the lands surrounding Kokanee Glacier Provincial Park.

The wildlife impact assessment by s.22 raised concerns about the effects of the proposed tenure on wildlife including: mountain goats; wolverines; and listed amphibians, reptiles and birds. Further study is needed to determine the full extent of mountain goat usage in the proposed areas. Wolverine are a species of conservation priority in BC, in Canada and internationally. The high decibel level of helicopter travel may negatively affect mountain goat, wolverine and grizzly bear behaviour. In addition, increased human-animal interactions may negatively affect a wide variety of wildlife species in the proposed areas.

s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

Kokanee Glacier Provincial Park is experiencing increased cumulative affects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of a cumulative impacts study of existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Thursday, May 28, 2015 4:55 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

Jessica Outhwaite
Client Service Representative
FrontCounter BC

Toll-Free: 1-877-855-3222
www.frontcounterbc.ca

How Did We Do?

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-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Thursday, May 28, 2015 3:45 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 15:44

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

The following points describe my major concerns:

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s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

Kokanee Glacier Provincial Park is experiencing increased cumulative affects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of a cumulative impacts study of existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Thursday, May 28, 2015 2:49 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

Jessica Outhwaite
Client Service Representative
FrontCounter BC

Toll-Free: 1-877-855-3222
www.frontcounterbc.ca

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-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Thursday, May 28, 2015 1:16 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 13:15

s.22

Comments:

Stop the Heli Skiing plan on the boundary with Kokanee Glacier Provincial Park.

I strongly support the West Kootenay EcoSociety's intervention on this hell skiing proposal. Please turn this application down immediately.

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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The wildlife impact assessment by s.22 raised concerns about the effects of the proposed tenure on wildlife including: mountain goats; wolverines; and listed amphibians, reptiles and birds. Further study is needed to determine the full extent of mountain goat usage in the proposed areas. Wolverines are a species of conservation priority in BC, in Canada and internationally. The high decibel level of helicopter travel may negatively affect mountain goat, wolverine and grizzly bear behaviour. In addition, increased human-animal interactions may negatively affect a wide variety of wildlife species in the proposed areas.

s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

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Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Sincerely,

s.22

Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Thursday, May 28, 2015 1:52 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing

Jessica Outhwaite
Client Service Representative
FrontCounter BC

Toll-Free: 1-877-855-3222
www.frontcounterbc.ca

How Did We Do?

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-----Original Message-----

From: info@ecosociety.ca [<mailto:info@ecosociety.ca>]
Sent: Thursday, May 28, 2015 12:43 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 12:42

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Thursday, May 28, 2015 1:09 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

Jessica Outhwaite
Client Service Representative
FrontCounter BC

Toll-Free: 1-877-855-3222
www.frontcounterbc.ca

How Did We Do?

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-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Thursday, May 28, 2015 11:47 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 11:47

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Thursday, May 28, 2015 12:39 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

Jessica Outhwaite
Client Service Representative
FrontCounter BC

Toll-Free: 1-877-855-3222
www.frontcounterbc.ca

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-----Original Message-----

From: info@ecosociety.ca [<mailto:info@ecosociety.ca>]
Sent: Thursday, May 28, 2015 11:23 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 11:22

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Thursday, May 28, 2015 12:36 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

Jessica Outhwaite
Client Service Representative
FrontCounter BC

Toll-Free: 1-877-855-3222
www.frontcounterbc.ca

How Did We Do?

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-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Thursday, May 28, 2015 11:15 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 11:15

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Friday, May 29, 2015 2:33 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Friday, May 29, 2015 12:34 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Friday, May 29, 2015 - 12:33

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Friday, May 29, 2015 11:58 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

-----Original Message-----

From: info@ecosociety.ca [<mailto:info@ecosociety.ca>]
Sent: Friday, May 29, 2015 10:56 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Friday, May 29, 2015 - 10:56

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

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existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Friday, May 29, 2015 9:59 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Friday, May 29, 2015 8:58 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Friday, May 29, 2015 - 08:57

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Friday, May 29, 2015 9:25 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Thursday, May 28, 2015 4:42 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 16:42

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Friday, May 29, 2015 9:24 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

-----Original Message-----

From: info@ecosociety.ca [<mailto:info@ecosociety.ca>]
Sent: Thursday, May 28, 2015 5:10 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 17:10

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Friday, May 29, 2015 9:23 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Thursday, May 28, 2015 5:58 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Thursday, May 28, 2015 - 17:58

s.22

Comments:

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Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Friday, May 29, 2015 4:24 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Friday, May 29, 2015 3:22 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Friday, May 29, 2015 - 15:22

s.22

Comments:

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Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Friday, May 29, 2015 3:29 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

-----Original Message-----

From: info@ecosociety.ca [<mailto:info@ecosociety.ca>]
Sent: Friday, May 29, 2015 2:28 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Friday, May 29, 2015 - 14:27

s.22

Comments:

NO MORE HELI TENURES!!!! I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Christensen, Cathy FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Friday, May 29, 2015 3:40 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Friday, May 29, 2015 2:39 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Friday, May 29, 2015 - 14:38

s.22

Comments:

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Lunan, Jessie FLNR:EX

From: FCBC Cranbrook FLNR:EX
Sent: Thursday, May 28, 2015 8:32 AM
To: Lunan, Jessie FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

More comments for you

Cathy Christensen
Ministry of Forests, Lands and Natural Resource Operations FrontCounter BC Cranbrook
Phone: 250-426-1794

-----Original Message-----

From: FrontCounter BC FLNR:EX
Sent: Wednesday, May 27, 2015 3:59 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

Jessica Outhwaite
Client Service Representative
FrontCounter BC

Toll-Free: 1-877-855-3222
www.frontcounterbc.ca

How Did We Do?

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Freedom of Information Disclaimer

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-----Original Message-----

From: info@ecosociety.ca [<mailto:info@ecosociety.ca>]
Sent: Wednesday, May 27, 2015 2:57 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Wednesday, May 27, 2015 - 14:56

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

I fully agree with each of the points listed above. I would like to add that residents of the entire Kootenays, not just the residents of Nelson, need to be considered in the implications of this proposal. This is another situation similar to the Jumbo Resort fiasco. Only money matters, not wildlife, local residents, or our future generations. It is appalling.

Lunan, Jessie FLNR:EX

From: FCBC Cranbrook FLNR:EX
Sent: Thursday, May 28, 2015 8:31 AM
To: Lunan, Jessie FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

More comments for you

Cathy Christensen
Ministry of Forests, Lands and Natural Resource Operations FrontCounter BC Cranbrook
Phone: 250-426-1794

-----Original Message-----

From: FrontCounter BC FLNR:EX
Sent: Wednesday, May 27, 2015 2:59 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

Jessica Outhwaite
Client Service Representative
FrontCounter BC

Toll-Free: 1-877-855-3222
www.frontcounterbc.ca

How Did We Do?

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-----Original Message-----

From: info@ecosociety.ca [<mailto:info@ecosociety.ca>]
Sent: Wednesday, May 27, 2015 1:35 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Wednesday, May 27, 2015 - 13:35

Comments.

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Lunan, Jessie FLNR:EX

From: FCBC Cranbrook FLNR:EX
Sent: Thursday, May 28, 2015 8:31 AM
To: Lunan, Jessie FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

More comments for you

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Ministry of Forests, Lands and Natural Resource Operations FrontCounter BC Cranbrook
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From: FrontCounter BC FLNR:EX
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To: FCBC Cranbrook FLNR:EX
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-----Original Message-----

From: info@ecosociety.ca [<mailto:info@ecosociety.ca>]
Sent: Wednesday, May 27, 2015 1:18 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Wednesday, May 27, 2015 - 13:17

Comments:

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Lunan, Jessie FLNR:EX

From: FCBC Cranbrook FLNR:EX
Sent: Thursday, May 28, 2015 8:30 AM
To: Lunan, Jessie FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

More comments for you

Cathy Christensen
Ministry of Forests, Lands and Natural Resource Operations FrontCounter BC Cranbrook
Phone: 250-426-1794

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From: FrontCounter BC FLNR:EX
Sent: Wednesday, May 27, 2015 2:21 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

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-----Original Message-----

From: info@ecosociety.ca [<mailto:info@ecosociety.ca>]
Sent: Wednesday, May 27, 2015 1:16 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Wednesday, May 27, 2015 - 13:15

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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A commercial recreation tenure will act as a barrier to general public access. Regulations aside, commercial operators may harass the general public or cite safety issues to exclude the public. Increased noise and the further loss of public recreational areas again demonstrate the need for a land use plan in the lands surrounding Kokanee Glacier Provincial Park.

The wildlife impact assessment by s.22 raised concerns about the effects of the proposed tenure on wildlife including: mountain goats; wolverines; and listed amphibians, reptiles and birds. Further study is needed to determine the full extent of mountain goat usage in the proposed areas. Wolverines are a species of conservation priority in BC, in Canada and internationally. The high decibel level of helicopter travel may negatively affect mountain goat, wolverine and grizzly bear behaviour. In addition, increased human-animal interactions may negatively affect a wide variety of wildlife species in the proposed areas.

s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

Kokanee Glacier Provincial Park is experiencing increased cumulative affects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of 8a cumulative impacts study of existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Lunan, Jessie FLNR:EX

From: FCBC Cranbrook FLNR:EX
Sent: Thursday, May 28, 2015 8:30 AM
To: Lunan, Jessie FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

More comments for you

Cathy Christensen
Ministry of Forests, Lands and Natural Resource Operations FrontCounter BC Cranbrook
Phone: 250-426-1794

-----Original Message-----

From: FrontCounter BC FLNR:EX
Sent: Wednesday, May 27, 2015 2:20 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

Jessica Outhwaite
Client Service Representative
FrontCounter BC

Toll-Free: 1-877-855-3222
www.frontcounterbc.ca

How Did We Do?

Clients of FrontCounter BC are invited to take our customer satisfaction survey. We'd appreciate your input.

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-----Original Message-----

From: info@ecosociety.ca [<mailto:info@ecosociety.ca>]
Sent: Wednesday, May 27, 2015 1:13 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Wednesday, May 27, 2015 - 13:12

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

The following points describe my major concerns:

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Kokanee Glacier Provincial Park is experiencing increased cumulative affects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of a cumulative impacts study of existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Lunan, Jessie FLNR:EX

From: FCBC Cranbrook FLNR:EX
Sent: Wednesday, May 27, 2015 1:30 PM
To: Lunan, Jessie FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

This came in through the FCBC in box, I believe it is for you

Cathy Christensen
Client Services Assistant
FrontCounter BC
Ministry of Forests, Lands and Natural Resource Operations
1902 Theatre Road
Cranbrook, BC
Tel: 250-426-1794
Fax: 250-426-1767

-----Original Message-----

From: FrontCounter BC FLNR:EX
Sent: Wednesday, May 27, 2015 10:20 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Please see comments below.

Jessica Outhwaite
Client Service Representative
FrontCounter BC

Toll-Free: 1-877-855-3222
www.frontcounterbc.ca

How Did We Do?

Clients of FrontCounter BC are invited to take our customer satisfaction survey. We'd appreciate your input.

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-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Wednesday, May 27, 2015 9:15 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Wednesday, May 27, 2015 - 09:14

Comments:

Please consider my opposition to heli-ski operations adjacent to Nelson and the Kokanee Park. I am a longtime resident s.22 and backcountry user in the proposed areas.

I used to ski in the Bonnington range but since the establishment of the heli-ski tenure there it is impossible to enjoy being out in nature.

s.22 the helicopter traffic is already out of control and very disturbing.

I ski and hike in the areas currently proposed for tenure. I see goats, wolverine tracks, grizzly bears and a myriad of other animal signs. These animals are wild and if being buzzed by helicopters is disturbing to me I am sure that they will be gravely affected.

The Nelson area tourism commission is trying to promote the wild and peaceful adventure aspects of this beautiful region and Whitewater is heavily promoting the backcountry culture. Most skiers come to the area to appreciate the wild spaces. There are very few areas left to go for a peaceful ski tour and if this application is granted there will be virtually none.

Thank You for considering that a balance of backcountry users is the best approach for tourism, wildlife, and peace.

s.22

From: s.22
Sent: Sunday, May 3, 2015 10:27 PM
To: Lunan, Jessie FLNR:EX
Subject: Land Act Application by Kootenay Heli-Ski

Regarding: Land Act application by Kootenay Heli- Skiing for a commercial heli-ski tenure near Nelson, BC

I am concerned and opposed to the proposal by Kootenay Heli-skiing. This application will directly conflict with a backcountry ski area frequently used by myself and other members of the skiing public. Also, I am concerned that some of the sites conflict with wilderness values adjacent to Kokanee Glacier Provincial Park.

Some of my concerns are:

- The Arlington and Outlook areas (44, 50, 106, 107, 108, 109, 117, 119) are right on the boundary of the park, adjacent to or near areas which are used by backcountry skiers based out of the very popular Kokanee Glacier cabin. Frequent helicopter traffic would significantly detract from the wilderness values of ski touring in the adjacent park that citizens pay considerable money to experience. I ski in the park, along with other members of the public during annual ski weeks at Kokanee Glacier. The company will be tempted to use prime ski terrain in the Park if conditions within their tenure area are not suitable to ski. We do not want visitors to Kokanee Park to leave complaining about another heli-ski outfit poaching their lines! The Nelson area is a world-renowned destination for tourists who come here for backcountry skiing, and these visitors are an important part of our economy.

This heli-skiing application covers an area which is heavily used by visiting and local skiers because of its easy access from Nelson. All of the sites in the West Kokanee Creek drainage directly conflict with backcountry ski runs frequently used by Nelson-area residents, who use snowmobiles on the Forest Service road to access ski touring terrain. This will lead to completely unnecessary conflicts with heli-skiers and snowmobile assisted skiers. Please do not allow West Kokanee Creek to be tenured out to heli-skiers, this area should be left to snowmobile assisted skiers and those folks touring into the area from Kokanee Glacier Park. There are currently no problems in the area now, and I would like it to remain that way.

I completely appreciate the importance of heliskiing and other commercial recreation to the economy of Nelson and the West Kootenays, I just ask that the government recognize the importance of non-commercial, non-mechanized and mechanized ground access, backcountry recreation to the regional economy, as well as its importance to the lifestyle of residents of Nelson. Leave us space to be who we are. There are already enough heli- this and heli-that operations near Nelson, I see no point in allowing yet another heli-ski tenure to be issued, this will just degrade the experience already offered by other well established operations in the Nelson area.

Sincerely,

s.22

Lunan, Jessie FLNR:EX

From: Ackroyd, Hugh ENV:EX
Sent: Friday, April 24, 2015 12:36 PM
To: Lunan, Jessie FLNR:EX
Subject: FW: Province of BC Referral Request on an Adventure Tourism application

Hi Jessie,

I wanted to comment on Referral Number: 73599979 – 001 but I noticed that the comments had been closed in the system. Dianne Egan suggested that I send you an email with my comment.

I have had a number of park users contact me with the following concerns for this proposal:

- Backcountry Skiers who access the park in the Gibson Lake area to ski tour would be disturbed by the overflights adjacent to the Park Boundary
- Skiers who are staying in the Kokanee Glacier Cabin often tour up to Outlook Mt, Mt John Carter, Mt Giegerich and Sapphire Lakes along the South and West boundaries of the Park. There are concerns that the wilderness recreational experience of the park users will be impacted by the increased air traffic along the West and South boundaries of the Park
- The Alpine Club of Canada who operate the Kokanee Cabin under permit from BC Parks have indicated there could be potential impacts on their business model if winter use decreases due to a preserved reduction of wilderness experience by their clients.

I have recommended to all of the parties who have made these comments that they should send in their concerns through the public comments process.

I hope these comments are OK in this format.

Thanks Hugh

Hugh Ackroyd

Kootenay Lake Area Supervisor

Kootenay Okanagan Region

BC Parks

Nelson Office

250-354-6383

"Getting up the mountain isn't the problem it's making sure you can get down again" Don Whillans

From: Egan, Dianne J ENV:EX **On Behalf Of** ENV Nelson Referrals ENV:EX
Sent: Friday, March 27, 2015 3:46 PM
To: Ackroyd, Hugh ENV:EX
Subject: FW: Province of BC Referral Request on an Adventure Tourism application

FYI

Dianne Egan

Admin Section Head (Nelson and Cranbrook Offices)

Supporting the Ministries of Environment and

Forests, Lands and Natural Resource Operations

Kootenay - Boundary

#401 - 333 Victoria Street, Nelson, BC V1L 4K3

Phone: (250) 354-6147; Fax (250) 354-6332

Dianne.Egan@gov.bc.ca

From: FrontCounterBC@gov.bc.ca [<mailto:FrontCounterBC@gov.bc.ca>]
Sent: Thursday, March 26, 2015 9:06 AM
To: ENV Nelson Referrals ENV:EX
Subject: Province of BC Referral Request on an Adventure Tourism application

Ministry of Forests, Lands and Natural Resource Operations, Habitat Management - Nelson
Egan, Dianne J ENV:EX

Adventure Tourism/Commercial Recreation
Referral Number: 73599979 - 001
Reference Number: 157465
Request Sent: March 26, 2015
Response Due: April 25, 2015

You are invited to comment on the following Crown land application. A response is optional. If no response is received by the deadline, the application and adjudication process will move ahead.

This is an application for an Adventure Tourism for Guided tours for heli-skiing. The Ministry does not have the authority to grant access over private land. These areas will be removed from the final tenure area should a tenure be offered.

Proponent: Kootenay Heli-Ski Inc., Contact Name: Wendell Maki,
Contact Address: 89 Lakeside Drive, Nelson BC V1L 6K9,
Contact Phone: 250-505-2150, Contact Email: operations@kvheli.com

Tenure Type: Adventure Tourism, Licence of Occupation

Intended Land Use/background context:

BCGS Mapsheet: 82F.074

Legal Description: The area we are proposing is west of Kootenay Lake, North of Nelson BC and the West Arm of Kootenay Lake. It lies to the east of Slocan Lake and between Highway 31 and Highway 6. It also borders Kokanee Glacier Provincial Park, which is located to the east, please refer to map page 7.

As this area is all remote backcountry we do not anticipate any additional traffic other than periodic resource-based activities. We will only operate our tourist-based activities in the winter when the majority of industry, recreation and wildlife are dormant.

Size (Area) in ha. (approx.): 144.66sq km (14,666 ha)

Schedule/Term Of Proposal: Ten to thirty years

Please [Click Here](#) to respond to this referral. You must be logged in using your Government IDIR account to view associated information. Note that forwarding or otherwise distributing this email will provide access to the associated information only if the receiver has a corresponding account.

For "how-to" instructions on how to respond to this request, please visit
http://gwww.nro.gov.bc.ca/business_areas/fcbc/training/

For technical assistance with e-Referrals, please contact FrontCounter BC at 1-877-855-3222.

For more information regarding this referral, please contact the "Email Coordinator" given within the referral.

Note that it can take an extended period of time to connect to the e-Referrals website, this is normal. Avoid re-clicking the "Next" button or you could extend this connection time.

Please do not reply to this email.

Jessie Lunan

FrontCounterBC
Land Officer

(250) 426-1779
Jessie.Lunan@gov.bc.ca

May 1, 2015

Attention: Jesse Lunan, Land Officer
Land Authorizations – Kootenay
BC Ministry of Forests, Lands and Natural Resource Operations

Dear Ms. Lunan,

Re: **Land Tenure Application: Kootenay Heli-Skiing Inc.**

The Kootenay Mountaineering Club would like to make a submission on the application by Kootenay Heli-Ski Inc. for a commercial heli-ski operation near Nelson.

While we are not opposed to heli-skiing in general, or to the idea of a new heli-skiing operation near Nelson, we are concerned that some of the proposed landing sites in this application conflict with backcountry ski area frequently used by our members and others of the skiing public. Also, we are concerned that some of the sites conflict with wilderness values in Kokanee Glacier Provincial Park.

Some of our specific concerns are:

- Some sites in the Arlington and Outlook areas (44, 50, 106, 107, 108, 109, 117, 119) are right on the boundary of the park, adjacent to or near areas which are used by backcountry skiers based at the very popular Kokanee Glacier cabin. Frequent helicopter traffic would significantly detract from the wilderness values of ski touring in the park. Our club has an annual ski week at Kokanee Glacier, and many of our members participate in other ski weeks in the park throughout the winter.
- All of the sites in the West Kokanee Creek drainage conflict with ski runs in an area which is frequently used by Nelson-area residents, who use snowmobiles on the Forest Service road to access ski touring terrain.

We are therefore opposed to this application if it included sites in the areas mentioned above.

Although we appreciate the importance of heli-skiing and other commercial recreation to the economy of the West Kootenays, we ask that the government recognize the importance of non-commercial, non-mechanized, backcountry recreation in the regional economy, as well as its importance to the lifestyle of residents of the area. The West Kootenays are a world-renowned destination for tourists who come here for backcountry skiing, and these visitors are an important part of our economy. This heli-skiing application covers an area which is heavily used by visiting and local skiers because of its easy access from Nelson. We feel that such heli-skiing operations would be better located in more remote areas.

.....2/

We request the opportunity to meet with the proponent and Ministry staff, preferably in a public meeting format. Furthermore, we request that this application be dealt with by Ministry staff in the Nelson or Castlegar offices, as staff in the West Kootenays are more likely to be familiar with land use and recreation issues in the area, and are more accessible to local residents who may wish to offer input.

I will be unavailable from mid-May to mid-July. Should KMC representation or input be needed in my absence, please contact Mr. Ross Bates, Treasurer, KMC at ^{s.22}

A handwritten signature in dark ink, appearing to read 'D. Clark', written over a horizontal line.

Doug Clark,
President,
Kootenay Mountaineering Club

Phone ^{s.22}

cc- KMC Executive

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Sunday, April 19, 2015 11:03 PM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

To Whom it may concern,

As it stands now in the Kootenay's, there is an unspoken respect and understanding between Heli ops, Catski ops, Backcountry Lodges, sledders, and ski tourers, various cabin's (BC Rec & Sites approved, or not) to stick to their own zones and we all get along.

When overlapping of areas start to infringe upon others, conflict will arise. If in the end, we as the community who live here, are not allowed to enter the places we have been going to for years (and our kids hopefully), then conflicts will arise. And not for the betterment of anybody or business or tourism.

I see the need for jobs and tourism. But there is a limit. There is enough.

If the lease of crown land to the point that every square foot is for the tourist, what is left for the people who live here? Do we not deserve peace and quiet? A place to bring our kids without a heli or cat buzzing around constantly?

The tenure application speaks of wildlife impact. Heli, Cat's, sleds all have an impact on wildlife. Can anybody seriously convince me it does not? Does this applicant Wendall Maki of KHS, after reading the wildlife impact part of the application, really believe that heli's do not disturb the animals in that area? The whump, whump of the blades all day long?

The guest's that win the winter lottery for the Trudeau Cabin in Kokanee Park will now have to ski tour over lines and listen to the constant pounding of a Heli overhead. Sounds like a great way to spend your hard-earned holiday's outdoors.

On a personal note, for years gone and present, I ski all over the proposed Heli tenure and IT IS a medium used zone by locals (despite what the application says). It is almost all we have left.
I can attest to what goes on 'out there' during the winter as I am there!

Over the past decade, a granting of tenures from Glacier National Park south to the US border seems to have begun to be a race to the finish. Off the top of my head, what we have now in 2015:

Jumbo Glacier Resort
SnowWater Heli
Vahalla Powder Cats
Redfish sled/ski zone
RK Heli

s.22 new recent approval up Milton Crk Gravity Sports application (and denied) for a catski operation near this applicant's zone BC Rec & Sites approved cabins Meadow Crk cat skiing Stellar Heli (partially in a park I might add) LadyBird sled zone Mountain Trek catski White Water Ski hill Red Mountain Ski hill Big Red catski ACC Trudeau lottery cabin in Kokanee park Grizzly Crk sled zone Crusader sled zone Mountain Trek recent Cat ski approval Retallack Cat ski Valkyr Adventures Carlyle Lodge BaldFace Cat Ski Ice Crk Lodge Vahalla Mountain Touring Lodge

And there is more out there...

In case you haven't got the point, if this tenure is granted, local sledders and ski tourer's will most likely continue to use this applicants tenured area with no regard to his wishes and rights.

This is unfortunately the position we are in due to the decisions that have been made over of the past 15 years.

I have hope that a sound, informed decision will be made regarding this application.

Best regards,

s.22

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 15, 2015 7:16 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

Duhamel Watershed Society
s.22

info@duhamelwatershedsociety.com

Ministry of Forests, Lands and Natural Resource Operations

Re: Commercial Recreation/Heli Ski Application. File # 4405571

The Duhamel Watershed Society opposes this application. We write this letter to urge the MFLNRO to apply serious consideration regarding the introduction of a commercial tourism operation in an area that is already being actively logged and is heavily accessed for recreational use. The 5,800 ha of Duhamel Creek Watershed was designated a Community Watershed in June 1995 and is home to approximately 1100 residents living in and around its alluvial fan. It is estimated that there are close to 600 people who draw their drinking water from Duhamel Creek.

We have many concerns regarding this application. One, that there is already heavy usage in the Duhamel Watershed; both recreational activities and industrial logging. Two, that there has been little attempt to consult or inform local residents who live in this moderately dense populated area; noise considerations in a pastoral residential area must be assessed. Three, what are the wilderness conservation considerations? And finally, we worry that there is no monitoring program in place that oversees our watershed in a holistic way.

Our watershed is a heavily used recreational area that is also being actively logged. The addition of a heli-ski operation in the area adds just one more activity to the long list of stakeholders and users that frequent the watershed. High recreational usage of this watershed already exists:

- Snowmobiling
- ATV'ing
- Hiking
- X-country skiing
- Back-country touring
- Fishing
- Camping
- Huckleberry picking
- Hunting
- Trapping
- Prospecting

Of concern to us, are the many types of users and an apparent absence of collective stewardship.

Access to the watershed by all the recreational users has been made easy by the logging activities, which have been present in one way or another in the watershed for the past century. Recently, logging has ramped up and is currently using large industrial machinery to clear cut large sections in a way that is broadly considered unsustainable by industry and environmentalists alike. Once again, our emphasis is caution and we want to bring awareness to the lack of

oversight that would consider the watershed as a holistic ecosystem and that its natural balance is at risk of serious compromise; potentially leading to watershed exhaustion. We are looking for assurance that this is not the case.

In the heli-ski application we notice a reference to avalanche control assessment, but documentation is conspicuously absent in the application. The backcountry of Duhamel creek, especially near the four lakes at its source, is already an area of high risk of frequent, naturally occurring avalanches. Logging in the area increasingly compromises slope stability. We wonder whether there has been an assessment regarding heli-noise and its affect on steep, snowladen valley banks? Climate change predictions in the West Kootenay point to increased precipitation during the non-summer months. What would happen if a major avalanche were to reach the lakes and displace all that water? Where would that water go?

These are big questions and, wildlife corridors have not yet entered into the discussion. We are aware that our Regional District Representative, Tom Newell has submitted written objection to the lack of public process that has taken place regarding this application. We echo his concerns. A concerted effort to discuss impacts of this business venture upon local residents is crucial. Open discussion often illuminates concerns, or benefits, that may be missed if the discussion doesn't take place.

Once again, we have serious concerns about an application to operate yet another activity in our watershed in the absence of collective stewardship and public consultation.

Duhamel Watershed Society
info@duhamelwatershedsociety.com

Donald, Jo-Ann FLNR:EX

From: do-not-reply@arfd.bc.ca
Sent: Friday, May 8, 2015 12:14 AM
To: FLNR Cranbrook ARFD FLNR:EX
Subject: Land Application Comments [File #4405571].

I read the posted environmental review and found it to be laughable. This isn't a review, it is a wish document. It says sure, we're going to destroy the environment, but we'll keep an eye on it while we do so. There is no mention of how disturbing this near constant noise from the low flying helicopters will be to hibernating bears, how the low flying helicopters will keep the goats, deer and antelope in a near constant movement, in deep snow, using body energy to move instead of keeping warm in the winter. Nor does it mention the effects of the exhaust pollution will have as it accumulates on the snow. From there it will flow into the waters of the surrounding lakes, polluting them even more. To minimize water pollution the Impact statement recommends for dealing with human waste: ensure that all human waste is packed out or buried deep in snow at least 100m from water sources." So, when the snow melts in the spring how much human waste with used toilet paper is going to be!

coming down the mountains into the water ways and into the surrounding lakes. Are people going to be expected to clear this waste off beaches or out of the lakes? Nor, does it mention the fuel spills that will happen as the helicopters are refueling. There is no mention of the fuel trucks creating more pollution from their exhaust, there is no mention of any plan to clean up if one of these trucks crashes and spills its fuel into the surrounding creeks or lakes. The impact statement makes no mention of the environmental damage from the inevitable crash that will occur as helicopters are prone to crashing. Finally the report does not make any mention of what action will be taken when the pilots fly over Kokanee glacier park. This will take place, as clients will demand to be shown the glacier from the air, and the pilots will comply, it will happen

Further, the impact statement nothing was done regarding the people who live in the area. How much of an assessment was done regarding peoples health? According to a study published in the Atmospheric Pollution Research journal, air pollution could be spreading up to three times farther than previously thought. With 1300 client days, who knows exactly how many extra helicopter flights this is, there will be a much larger amount of air pollution, increasing respiratory problems, cognitive problems as well for young and older people. According to Health Canada, "poor air quality from traffic pollution is associated with a number of health issues, such as asthma in children and other respiratory diseases, heart disease, cancer and increased rates of premature death in adults." The noise from these extra helicopter flights will lead to more stress in peoples lives, with related health problems such as higher blood pressure, leading to early deaths. I have resided in regions with

h a number of airports, for large and small aircraft, and private helicopters flying reporting news and road conditions. From very early in the morning until past midnight, an aircraft could be heard as closely spaced as every two minutes. There was no escape from the noise inside a building nor outside, no peace, nor letup even on such holidays as Christmas day, it was continuous.

Must every square inch of this planet be developed in order to have value. Doesn't the land left as is have value? Is there really going to be such an economic gain for Nelson. Hotels are mostly full in the winter, people already eat out a lot.

s.22

If this application goes through, I feel that I will have no recourse but to sell my house and move elsewhere as I do not desire to wake up to aircraft noise and go to sleep with aircraft noise. The skies overhead do not belong to businesses, they belong to all, reject this proposal and all future such proposals.

There is a lot of skiing already in the area. This proposal isn't needed, nor should it be granted.

Lunan, Jessie FLNR:EX

From: s.22
Sent: Friday, May 29, 2015 4:06 PM
To: Lunan, Jessie FLNR:EX
Cc: s.22
Attachments: CSEKIRKSGULOFINAL (1).txt; Wolverine-Winter Recreation Project 2014 Progress Report Final.pdf

Dear sirs

In regard to File # 4405571 Heli skiing application.

I have attached two studies on wolverines on local inventory of wolverines ion the central Selkirks completed last year. This is the area of the application. The other is an ongoing study in the US on recreation and wolverine disturbances. The Kokanee range is the southernmost stronghold of the wolverine in Canada. The area has the highest occupancy rate for the species in southern BC. The critical time for the wolverine is the denning period for the female from Feb to April. The dens are typically in high alpine teraine and are vulnerable to disturbance as shown in the study from Utah. In the wildlife impact assessment that accompanies the application "

Given that wolverine and good wolverine denning exists within the study area, and that the species is active in the winter, the potential risks of this project to the species behavior are moderate" As the wolverine is considered a species of special concern in Canada and only an estimated 300 remain in the US lower 48. This important wolverine population should not be subject to the stress of multiple helicopter flights with 119 landing zones with all the dropoff zones in potential denning areas. It is very hard to identify dens and the females are going to look elsewhere for dens if there is frequent flight activity all winter before choosing a den. With a healthy population with a 70% occupancy these solitary animals are going to be stressed to find a new habitat. This healthy population is necessary for the oportunity for the trapper to harvest some animals and for helping neighboring areas populations to recover.

s.22

Sincerely s.22

WOLVERINE – WINTER RECREATION RESEARCH PROJECT:
INVESTIGATING THE INTERACTIONS BETWEEN WOLVERINES
AND WINTER RECREATION

2014 PROGRESS REPORT



OCTOBER 27, 2014

KIMBERLY HEINEMEYER
ROUND RIVER CONSERVATION STUDIES
284 W 400 N, SUITE 105
SALT LAKE CITY, UTAH 84103

AND

JOHN R. SQUIRES
ROCKY MOUNTAIN RESEARCH STATION
ROOM 263, FEDERAL BUILDING
200 E. BROADWAY
MISSOULA, MT 59802

WOLVERINE – WINTER RECREATION RESEARCH PROJECT:
Investigating the Interactions between Wolverines and Winter Recreation

2014 PROGRESS REPORT

OCTOBER 27, 2014

KIMBERLY HEINEMEYER
ROUND RIVER CONSERVATION STUDIES
284 WEST 400 NORTH, SUITE 105
SALT LAKE CITY, UT 84103

AND

JOHN R. SQUIRES
ROCKY MOUNTAIN RESEARCH STATION
ROOM 263, FEDERAL BUILDING
200 E. BROADWAY
MISSOULA, MT 59802

WITH THE SUPPORT OF PROJECT PARTNERS AND COLLABORATORS INCLUDING:

BOISE, BRIDGER-TETON, CARIBOU-TARGHEE, PAYETTE AND SAWTOOTH NATIONAL FORESTS
IDAHO DEPARTMENT OF FISH AND GAME
LIZ CLAIBORNE ART ORTENBERG FOUNDATION
THE WOLVERINE FOUNDATION
UNIVERSITY OF MONTANA
GRAND TETON NATIONAL PARK
WYOMING DEPARTMENT OF GAME AND FISH
US FISH AND WILDLIFE SERVICE
IDAHO STATE SNOWMOBILE ASSOCIATION
BRUNDAGE MOUNTAIN RESORT
GRAND TARGHEE RESORT
JACKSON HOLE MOUNTAIN RESORT
CENTRAL IDAHO RECREATION COALITION
DEFENDERS OF WILDLIFE
THE SAWTOOTH SOCIETY
THE WINTER RECREATION COMMUNITIES OF CENTRAL IDAHO AND WESTERN YELLOWSTONE.

To obtain additional project information, see www.forestcarnivores.org

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Appendix I 16



WOLVERINE – WINTER RECREATION RESEARCH PROJECT

2014 Progress Report

EXECUTIVE SUMMARY

We have completed 5 winters of research detailing the interactions between wolverines and winter recreation, including the GPS tracking of both wolverines and winter recreationists in 3 study areas in central Idaho and 2 in the western Yellowstone. We have successfully gathered movement and habitat use information on 17 wolverines and collected over 4,500 tracks of winter recreationists. Heinemeyer and Squires 2013 details past efforts and this report updates that information with data and analyses completed in 2014. We seek continued support from The Wolverine Foundation as we enter into the final year of field data collection followed by a year of data analyses, reporting and outreach with agencies and stakeholders.

In 2014, we undertook an ambitious wolverine and recreation monitoring effort across 3 study areas and captured and GPS collared 8 wolverines. We collected nearly 2,000 GPS tracks including both backcountry skiers in the Teton Mountains and snowmobilers in the Centennial and Henry Mountain ranges in areas that overlap GPS-collared wolverines and potential wolverine habitats. We compiled these new data with our prior data as we continue data exploration. As we have suggested previously, wolverines appear to tolerate winter recreation in their home ranges, including denning females. Based on our preliminary findings, potential wolverine habitats that have even high levels of winter recreation may support resident wolverines despite the potential human disturbance. However, wolverines exposed to higher levels of winter recreation within their home range may show avoidance of these recreated areas, suggesting potential threshold effects. While these 'high recreation' wolverines may avoid recreated areas, they are still found within locally intense recreation areas 22% of the time but with elevated movement rates. Wolverines that reside in lower recreated landscapes are only found within high-recreated areas 6% of the time but show much higher movement rates than their 'high recreation' cousins. Additionally, we find that denning females show much higher movement rate increases in response to high recreation areas than non-denning females. There appears the potential for some level of habituation but energetic implications are clearly an area of additional research and analyses as we seek to understand these complex interactions.

We require an additional year (winter 2014-15) of field research in the western Yellowstone area and hope to also continue monitoring resident wolverines in our central Idaho study areas. This will be followed by a year (2016) of data analysis, reporting and outreach to agencies and stakeholders.

INTRODUCTION

The growing popularity of winter backcountry recreation has resulted in winter recreation expanding into previously undisturbed and unreachable public lands that represent the high quality wolverine habitats. The potential effects of winter recreation on wolverine reproduction, behavior, habitat use and populations are unknown but there is concern regarding the effects of winter recreation on the species, particularly in areas favored by females for reproductive denning (Greater Yellowstone Coordinating Committee 1999, Carroll et al. 2001, May et al. 2006, Copeland et al. 2007, Krebs et al. 2007). Even in Canada, which could be considered the North American stronghold for the species, wolverine status was changed to 'Special Concern' in May 2014 with increased winter recreation use combined with sensitivity of denning females listed among the primary reasons for this change (www.cosewic.gc.ca).

The goal of the Wolverine – Winter Recreation Study is to identify and evaluate wolverine responses to winter recreation. The project was initiated in 2009 with winter aerial surveys in central Idaho to identify and map the presence of wolverine as well as motorized and non-motorized winter recreation (Copeland 2009). These surveys identified areas of extensive recreation use within potential wolverine denning habitat, and wolverine presence in some of these areas of overlap. In the winter of 2010, the field-based research effort began with GPS monitoring of both wolverines and winter recreationists in areas where overlap between wolverines and winter recreation occurs.

The USFS Rocky Mountain Research Station and Round River Conservation Studies lead the study in partnership with the National Forests and the Idaho Department of Fish and Game. We also work with Wyoming Game and Fish and the Grand Teton National Park in areas where the study falls within these jurisdictions. We have developed a research effort that is uniquely collaborative across federal and state agencies, non-government organizations, winter recreationists and local businesses. This collaborative research approach is critical not only to the success of data collection efforts but also to build opportunities for collaborative and creative problem solving when research-based management actions are considered.

Over the 5 years of field data collection, we have monitored the movements and habitat use of 9 females and 8 male wolverines with an additional 1 female and 4 males collared but data not successfully gathered. This report focuses on data collection and analysis completed in 2014; a summary of prior efforts is available in Heinemeyer and Squires 2013.

2014 FIELD EFFORTS

STUDY AREAS

The 2014 field effort was multi-faceted and included continuing the monitoring of wolverines and winter recreations at various levels of intensity across our study areas in central Idaho (Boise, Payette and Sawtooth National Forests) while focusing the core of our effort to complete a first full year of data collection in 2 study areas in the western Yellowstone region of Idaho and Wyoming.

The new study areas in the western Yellowstone fell across 3 federal jurisdictions and 3 states. The 'Island Park' study area includes the Centennial and Henry Mountains south of the Idaho-Montana state line and on the Caribou-Targhee National Forest (NF). The GPS-equipped wolverines and recreationists frequently travelled north into Montana and onto the Gallatin NF in the Henry Mountains. The Teton study area encompasses the Teton Mountains which fall within the Caribou-Targhee and Bridger-Teton NFs and Grand Teton National Park, in both Idaho and Wyoming (Figure 1).

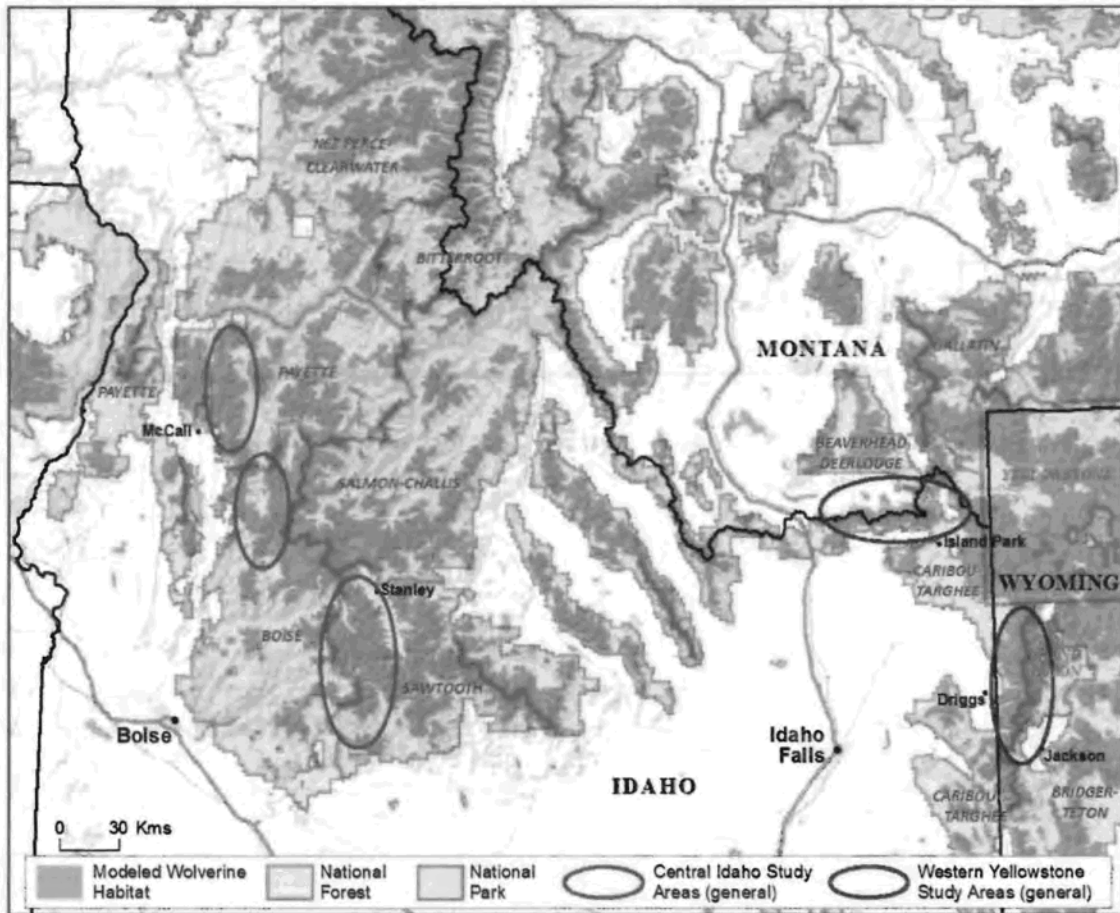


Figure 1. Idaho Wolverine-Winter Recreation Study Region and Study Areas: Central Idaho study areas on the Payette, Boise and Sawtooth National Forests indicated by blue circles, western Yellowstone study areas indicated by red circles.

WOLVERINE GPS COLLARING

Salmon Mountains Study Area. In central Idaho, we focused trapping efforts in the Salmon Mountains near McCall. The winter represented our 4th year collaring animals for intensive data collection in this popular winter recreation area over the course of 5 winter field seasons (we did not trap here in 2013). We were rewarded for our commitment to this important study area, capturing and collaring 3 adult female and 2 adult male wolverines (Figure 2). Traps were open between January 8 and February 20 prior to closing for denning season; during this time we recaptured some animals multiple times for a total of 8 wolverine captures in 184 trap-nights (Table 1). Of these, 2 females and one male were animals we have previously monitored including M1, our first male collared on the project in 2010 and F3 a female also initially collared in 2010. One of these females, F10, was an animal born in the White Cloud Mountains north of Sun Valley and collared there by our team as a subadult in 2012. We documented her ~100-mile dispersal from there to the Salmon Mountains where she established a home range that was nearly identical in spatial extent as the original F1 female who had been monitored in the area for 3 years (2010-2012) but has not been seen in 2 years. The new female F10 had her first kits this winter, likely fathered by M1 based on her home range within his territory. She chose a den within a drainage that was not visited by recreationists but is close to high levels of snowmobile recreation (Figure 2). In early September, we visited her now-abandoned den located in a large boulder field of a cirque basin (Figure 3) and collected and have submitted scat and hair samples for DNA analyses in hopes of identifying kits and their parentage.

Also in the Salmon Mountains, we collared a new male, M12 who appears to have replaced both M2 and M3 who have not been identified in recent winters. Male M12 occupies a home range covering a vast 2316 km² (913 mi²) which is the largest home range we have documented (Figure 2). We ran live traps and camera traps in the territory originally occupied by F2, but it appears to still be vacant after F2 disappeared more than 2 years ago. We were pleased to fit another GPS collar on F3 who was originally captured in 2010 when she successfully denned in a remote, non-recreated portion of the study area. Since then, we have continued to monitor her but have not seen evidence of additional reproductive effort.

Overall, we have witnessed a significant turnover of animals in these mountains, with 4 of our original 6 resident animals gone, replaced to date by only 2 new animals leaving a couple territories potentially vacant. These animals are exposed to high snowmobile recreation (Figure 2) and represent very important individuals to the research effort – including documenting residency, reproductive efforts and behavioral responses (e.g., movements, activity, habitat use).

Western Yellowstone Study Areas. In our new western Yellowstone study areas, we built new or repaired existing wolverine box traps in the Centennial, Henry and Teton Mountains on the Caribou-Targhee NF. We captured and collared 3 animals: 1 adult male in the Teton Mountains and a male and a female both in the Henry Mountains (Figure 4). The Teton male carries an implant transmitter from a prior research project, and we are waiting upon genetic analyses to identify this individual.

It is interesting that we did not capture more wolverines in these areas of known historic occupancy. In the Tetons, our trapping was limited to the west side of the mountain range and it is possible that there could be female wolverines that reside primarily in the eastern portions of the range. For the winter of 2015, we have applied for research permits to expand our trapping effort into Grand Teton National Park, providing access to the east side of the mountain range. We found no verified evidence of wolverines in the Centennial Mountains despite significant live-trapping effort in January and February (Table 1) followed camera-trapping through late March. The only potential evidence of wolverine presence was a possible track seen from fixed wing aircraft and thus identified with limited confidence. This mountain range is key habitat for wolverines as connectivity between the Yellowstone Ecosystem and the central Idaho complex of habitats (e.g., McKelvey et al. 2009, Idaho Department of Fish and Game 2014) and has been assumed by managers to support wolverines.

Table 1. Summary of trapping effort during January-February 2014 within each of the primary mountain ranges or study areas: for each species, the total number captured (including recaptures of the same animal) is listed first and the capture success rate is indicated as (captures/100 trap nights).

	Total Trap Nights	Wolverines	Marten	Fox
McCall (10 traps)	184	8 (4.3)	4 (2.2)	1 (0.5)
Tetons (6 traps)	255	2 (0.8)	4 (1.6)	9 (3.5)
Henrys (1 trap)	39	5 (12.8)	3 (7.7)	0 (0)
Centennials (5 traps)	174	0 (0)	2 (1.1)	0 (0)

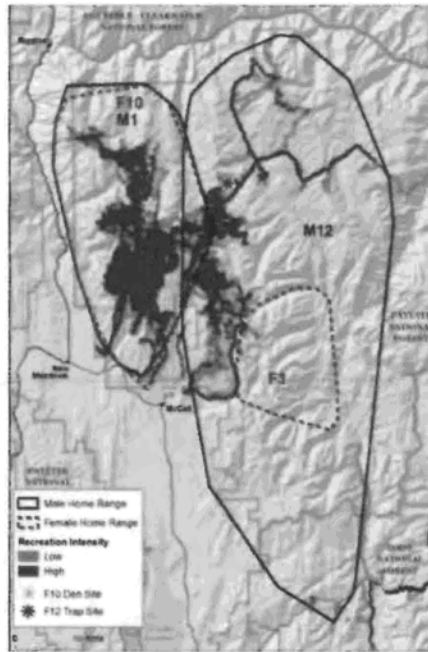


Figure 2. Home ranges of wolverines monitored in the winter of 2014 in the Salmon Mountains near McCall, Idaho with the estimated winter recreation footprint based on GPS recreation tracks: blue indicates median or higher density of recreation tracks while green indicates recreation track density of less than median. One female F12 was collared (location shown), but has not been relocated; another female, F10, denned in late February and her approximate den site is shown.

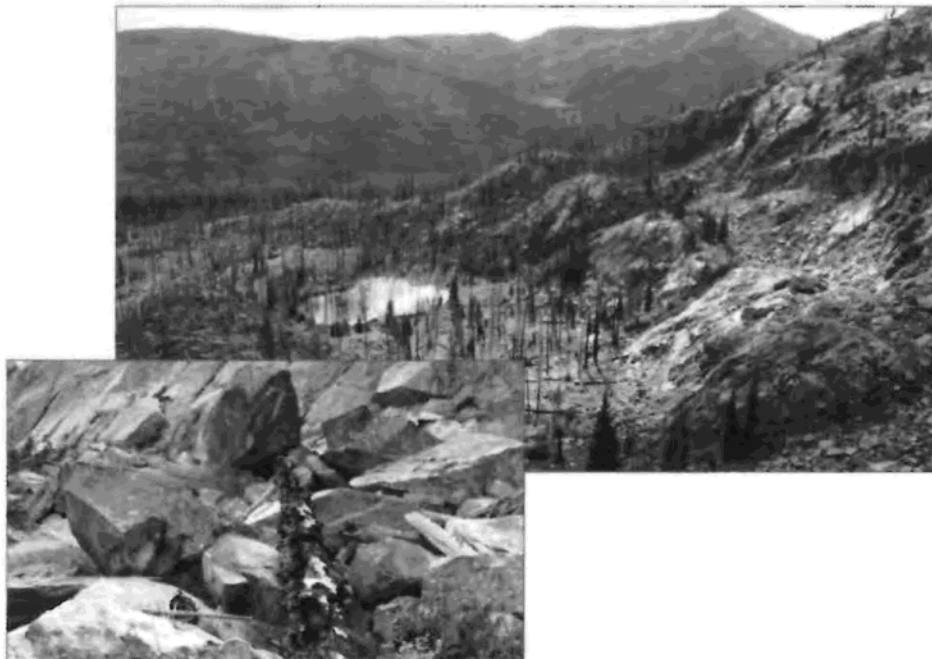


Figure 3. Female wolverine F10 denned in a large boulder talus slope in the upper reaches of a small drainage.

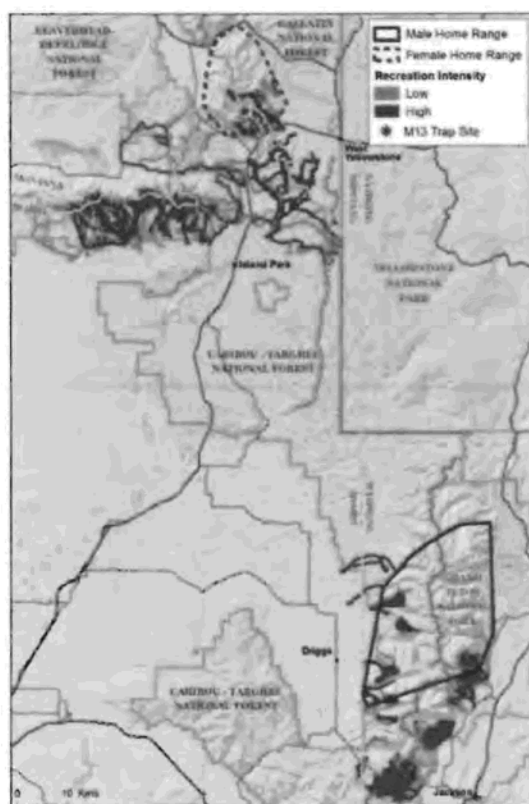


Figure 4. Home ranges of one male wolverine in the Tetons and one female wolverine in the Henry Mountains monitored in the winter of 2014 with the estimated winter recreation footprint based on GPS recreation tracks: blue indicates median or higher density of recreation tracks while green indicates recreation track density of less than median. One male M13 was collared in the Henry Mountains (location shown), but slipped the collar and no location data were collected.

CAMERA AND HAIR COLLECTION SAMPLING

We used camera and hair collection sets to monitor wolverines in portions of our study areas on the Sawtooth, Boise and Payette NFs in central Idaho and also used camera traps to supplement live-trapping efforts in our new study areas in western Yellowstone. From the effort in central Idaho, we have identified known animals we have previously GPS monitored and potentially new animals; we are waiting upon genetic results to confirm the identity of these animals.

Camera trapping and hair-snare sites were used in western Yellowstone to extend our ability to identify new animals beyond our live-trapping efforts. Cameras were placed at trap sites in mid-February when live-traps were disabled for the denning season and cameras were maintained at traps not re-opened in mid-March. In addition, we added a new camera-trap site to the far western portion of the Centennial Mountains to ensure we had adequately covered potential habitats through the mountain range. All trapping in our western Yellowstone study areas, including camera-trapping, ended in early April prior to grizzly bear emergence to avoid any conflict with the bears. We photographed our known 3 wolverines on our cameras in the western Yellowstone study areas but did not identify new animals from the effort.

RECREATION MONITORING

We undertook intensive recreation monitoring in our new western Yellowstone study areas, collecting 1,502 GPS tracks of backcountry skiers and the occasional snowmobiler in the Teton Mountains and 443 GPS tracks of snowmobilers in the Centennial-Henry Mountain study area (Figure 4). The GPS tracks provide high quality track information that can be used

at multiple spatial and temporal scales to evaluate wolverine responses (Figure 5) Based on our array of remote trail use counters, these GPS tracks represents a sample from an estimated more than 28,000 backcountry skiers and snowmobilers in the Teton Mountain study area and more than 23,000 snowmobilers in the Centennial-Henry Mountain study area. These levels of winter recreation exceed our highest levels recorded in the Salmon Mountains near McCall (which averages approximately 10,000 recreationists passing by our counters each winter). The high recreation in the western Yellowstone study areas confirms the importance of continuing our efforts in these new areas where wolverines have been present in the past and we assume are currently present in higher numbers than we were able to document this last winter.

We also completed an aerial-based winter recreation survey using methods described in Heinemeyer et al. 2011 for the Centennial, Henry, Teton and Snake River Ranges of the western Yellowstone and the Salmon Mountains near McCall (Appendix I). These aerial surveys use a standardized sampling approach to provide an independent estimate of the extent and relative intensity of winter recreation. These data will be used when working with the GPS track data to identify any information gaps or inconsistencies. For the Salmon Mountains, this data will be used to assess the prior GPS track data collected relative to the 2015 recreation patterns captured by the aerial surveys.

BASE DATA ACQUISITION AND PROCESSING

The eventual habitat modeling requires spatial data sets that span multiple jurisdictions and data owners. We invested significant effort over the summer to find, assess and compile most or all the primarily environmental and human infrastructure base layers into consistent data sets spanning multiple jurisdiction including 3 states, multiple National Forests and Grand Teton National Park. These base layers include land cover (vegetation cover, type, seral stage, etc), vegetation characteristics (e.g., NDVI, brightness and greenness indexes), terrain (elevation, slope, aspect, ruggedness), hydrology, roads, trails and snow-groomed routes.

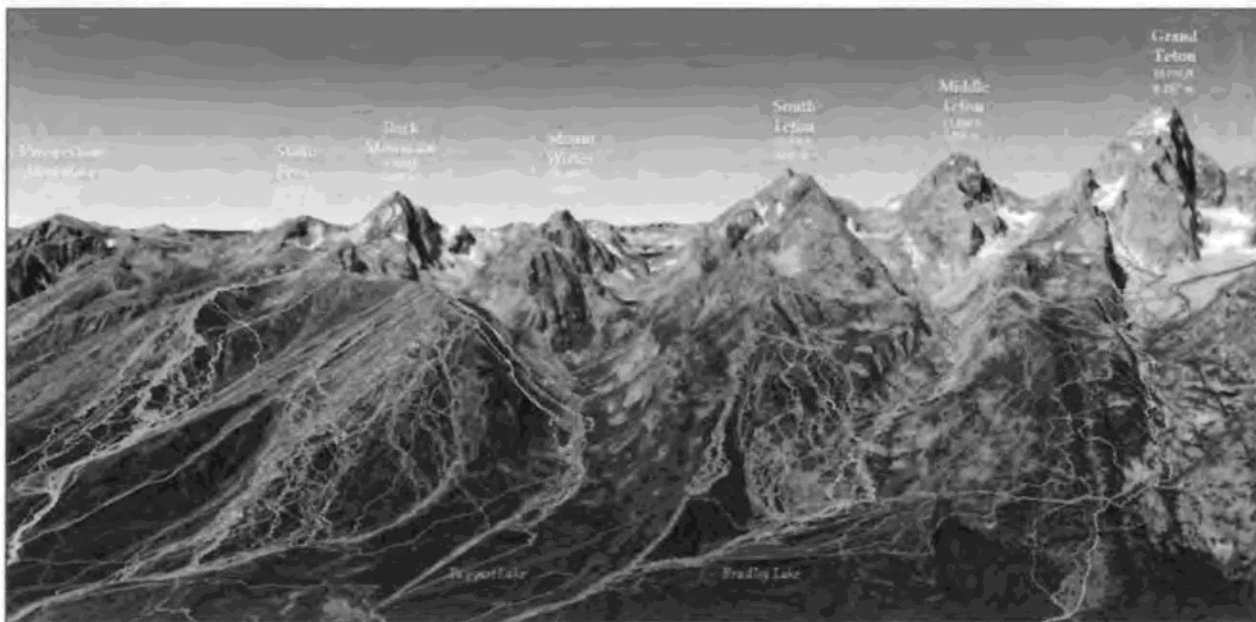


Figure 5. An example of the GPS recreation tracks collected by backcountry skiers in Grand Teton National Park during the winter of 2014; the male wolverine monitored in the Tetons travelled through this area.

PRELIMINARY ANALYSES

We have explored spatial and temporal patterns in the movements of wolverines relative to varying levels of snowmobile recreation intensity (we do not have sufficient sample size of animals exposed to backcountry ski activity to undertake analyses yet). Emerging patterns will help us refine our hypotheses and analyses.

Home range scale. For each study area, we estimated the winter recreation footprint based on our recreation GPS tracks, and from this we calculated the proportion of each wolverine home range that was within this footprint (e.g., Figure 2, 4). We found that across our animals, there was wide variability in their individual exposure to winter recreation from wolverines having less than 5% of their home range in recreation footprint to some wolverines having greater than 50% of their home range with snowmobile recreation. As we have suggested previously, wolverines appear to tolerate winter recreation in their home ranges, including denning females. Based on our preliminary findings, potential wolverine habitats that have even high levels of winter recreation may support resident wolverines despite the potential human disturbance.

We created an index of relative wolverine use of the recreation footprint by defining the *expected use* as equal to the proportion of each individual home range that was within the recreation footprint (assuming random use of the home range). We then classified each wolverine GPS location as in or out of the recreation footprint and calculated the proportion of locations that fell within the recreation footprint (i.e., estimated *realized use* of the recreation footprint). We calculated the difference between the realized and expected use of the recreation footprint for each wolverine ($n=18$). Summarizing this difference graphically by the amount of recreation within home range along the x-axis suggests there may be increasing avoidance of winter recreation areas as the amount of the home range affected by winter recreation increases (e.g., Type 3 selection, Johnson 1980; Figure 6). This is not a statistical approach, and additional analyses will control for potentially important variation. For example, we have not accounted for potential habitat differences between where people choose to recreate and habitats selected by wolverines, or if recreationist preferences change in areas with high competition for fresh snow leading to less overlap with potential wolverine habitats. Pursuing these lines of analyses may provide insights into variability in wolverine responses to winter recreation across different landscapes.

Individual movements. In prior reports, we presented preliminary analyses that suggests wolverines ($n=12$) exhibit higher movement rates and higher activity levels when they are in high recreation areas, with this effect most pronounced on weekends when the highest levels of recreation tend to occur (Figure 7). With our increasing sample size, we undertook some additional exploration of these patterns. We found that the reproductive status of the females may affect their potential response winter recreation with females who are denning ($n=6$) having a stronger response (i.e., higher movement rates) when in a high recreation zone than do females who are not denning ($n=9$) (Figure 8). These data are pooled across females based on the individual's denning status in each winter season and females that have been monitored for multiple years may have data in both categories if we monitored them in both denning and a non-denning years (total individual females included is 10 of which 5 have data for both denning and non-denning years).

We also found that the response to recreation may depend upon how much recreation an animal is exposed to within its home range. Animals that have more limited exposure ($n=13$) may respond more strongly when they are in a high recreation area compared to animals who are exposed to these higher levels of recreation across a large portion of their home range ($n=5$; Figure 9). This suggests some level of habituation by animals living in a highly recreated home range. Again, these analyses are preliminary but suggest the importance of understanding the potential for habituation, for of incorporating energetic costs into our analyses and the need to assess the ecological significance of identified responses not simply the statistical significance.

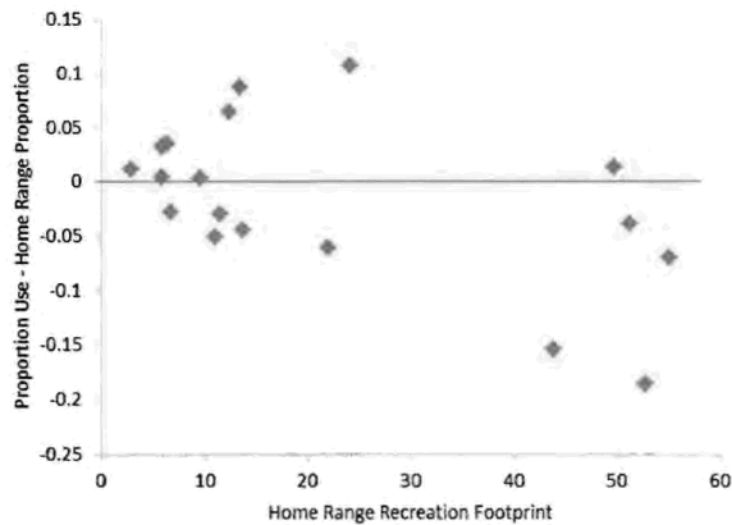


Figure 6. Difference between wolverine use of the recreation footprint and expected use based on amount of recreation within individual home ranges plotted based on percent of recreation within home range for wolverines monitored between 2010-2014; line at zero on the Y-axis represents expected difference if use of recreation footprint were random, values above zero represent higher use than expected and values below line represent lower use than expected.

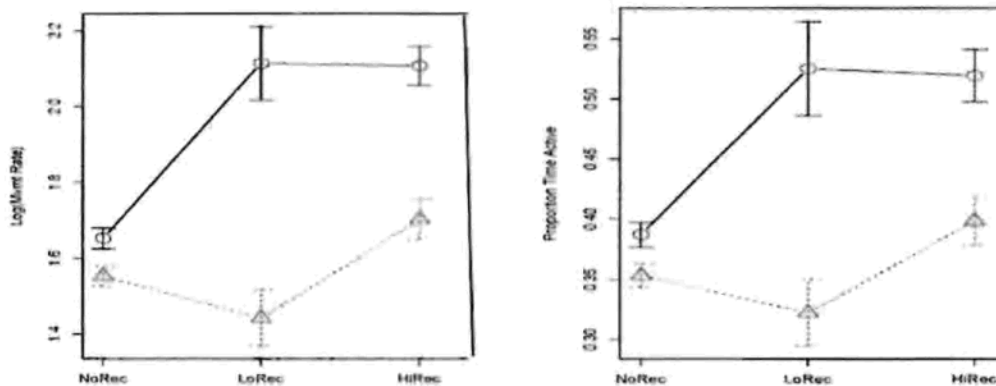


Figure 7. Preliminary results from an on-going study examining patterns in movement rates and activity level with 95% confidence intervals of wolverines on low (triangles) and high (circles) recreation days and within 3 classes of recreation zones representing relative levels of recreation activity. Data are from central Idaho, representing 12 wolverines monitored over 1 to 3 years from 2010-2012. *From Figure 5 in the 2013 Progress Report.*

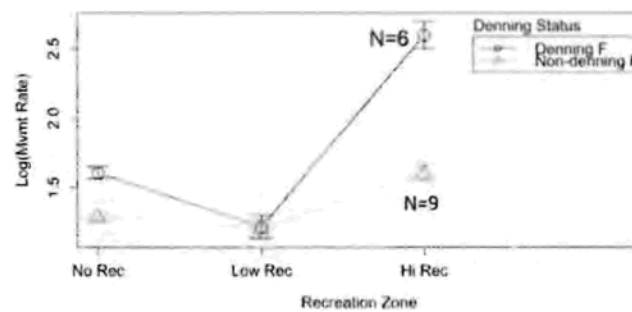


Figure 8. Movement rates of 6 denning and 9 non-denning female wolverines in areas classified as having no, low or high levels of winter recreation.

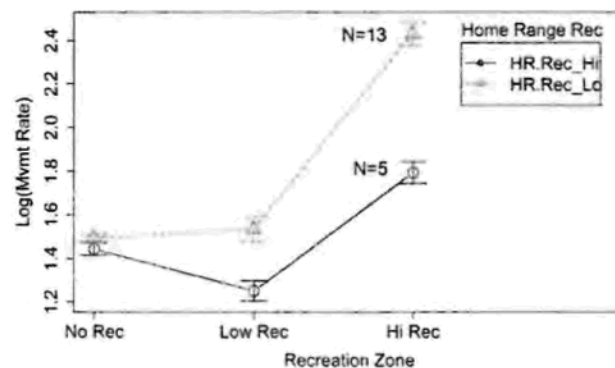


Figure 9. Wolverine movement rates classified by the amount of winter recreation within its home range (high recreation home range has >30% recreation) and by the local level of recreation at the GPS locations used to calculate movement rate data.

NEXT STEPS

We propose to complete one additional winter of research in the 2 new western Yellowstone study areas. Each study area supports high levels of recreation and known past occupancy by resident wolverines. While we had limited success capturing wolverines in these areas in 2014, we believe there remains high potential for animals to reside in these areas. Following the field collections in 2015, we will assess the need for an additional season in 2016 and only pursue additional collection if a focused and critical need is identified (e.g., female(s) residing in high recreation areas that are likely to den in 2016). Recreation monitoring will be implemented in 2015 to provide a second year of data including GPS handouts, remote trail use counts and aerial recreation surveys in our 2 western Yellowstone study areas. In addition, we will continue monitoring wolverines in our central Idaho study areas through remote camera and DNA collection combined with aerial den searches to document reproductive effort as resources allow. We may also continue limited recreation monitoring in some of our central Idaho study areas primarily through remote trail use counters. Analyses, report preparation and outreach to agencies and stakeholders are expected to take a year following the completion of the data collection and are anticipated to occur in 2016.

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APPENDIX I

Aerial recreation surveys were completed in each study area where trapping of wolverines was undertaken during the 2014 field season. An aerial recreation survey was completed for the western Yellowstone area including the Centennial, Henry, Teton and Snake River Ranges on January 24, 2014 (Figure I-1, Figure I-2). The methodology is described in detail in Heinemeyer et al. 2011, and is based on repeated point presence surveys that provide a relative intensity score within 2.5 km² grid cells. We were unable to complete the survey along the eastern portion of the Teton Mountains because of unsafe wind conditions. We attempted to fly a second survey on multiple occasions but weather conditions or snow conditions were repeatedly unsuitable. We completed 2 aerial recreation surveys in the Salmon Mountains study area near McCall as our primary data collection on the spatial extent and relative intensity of recreation in 2014. These surveys occurred on January 27 and April 3, 2014 (Figure I-3). These data will be used to assess and validate the use of prior GPS track-derived recreation patterns when assessing wolverine responses.

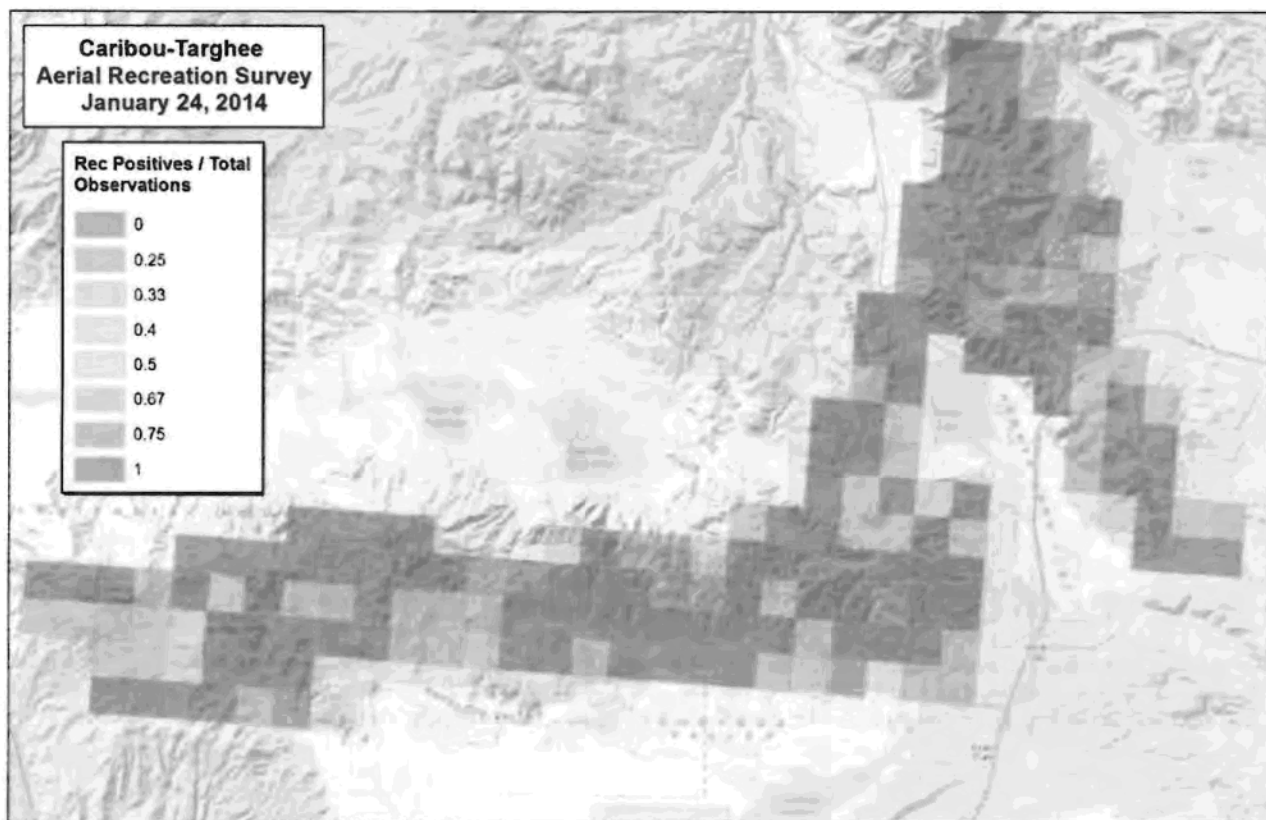


Figure I-1. Aerial winter recreation survey in the Centennial and Henry Mountains of the western Yellowstone using standardized survey protocols (Heinemeyer et al. 2011); the score is the percent of repeated presence observations that scored positive for recreation tracks within each 2.5 km² grid cell.

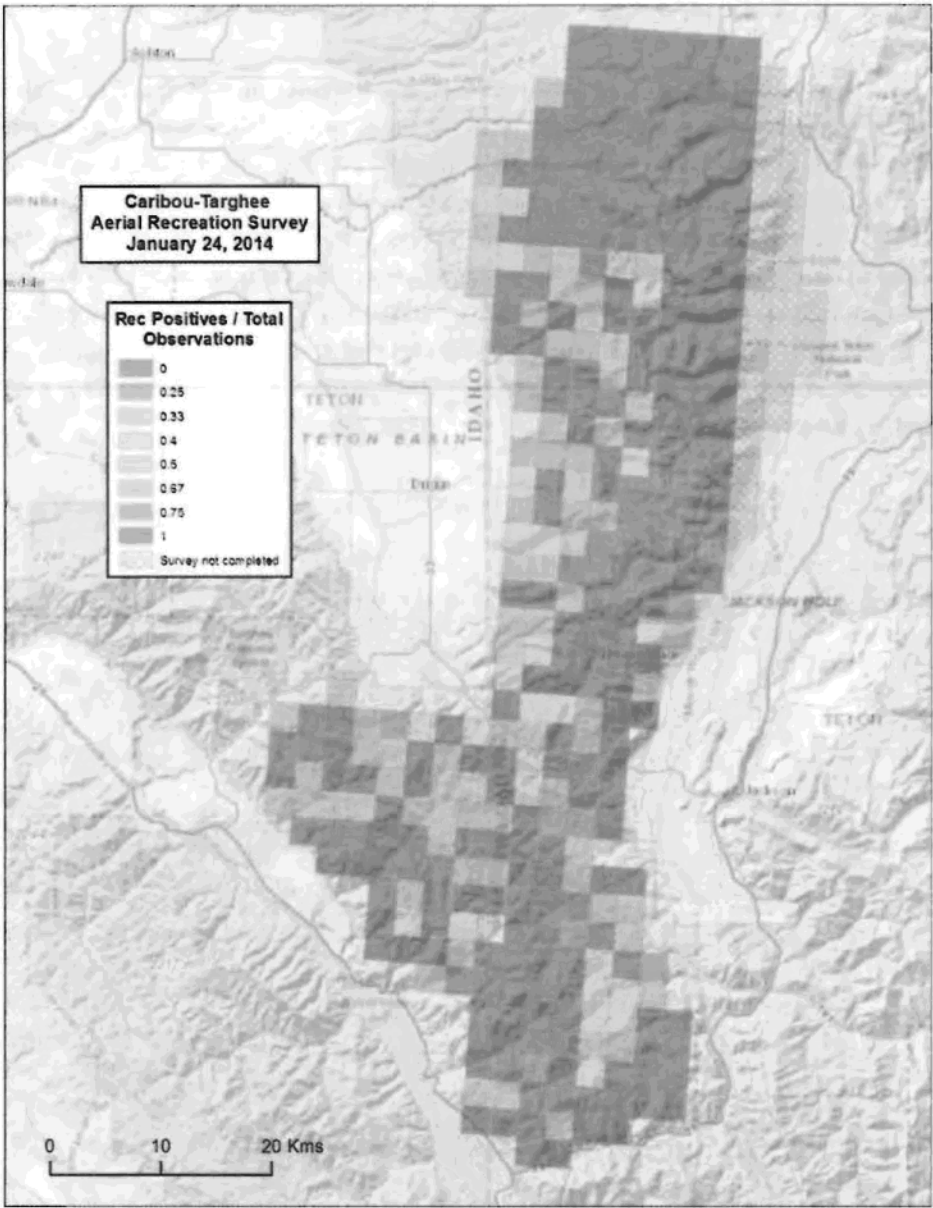


Figure I-2. Aerial winter recreation survey completed for the Teton and Snake River Range using standardized survey protocols (Heinemeyer et al. 2011); the score is the percent of repeated presence observations that scored positive for recreation tracks within each 2.5 km² grid cell and grey shaded cells represent areas along the eastern portion of the Tetons where weather caused the survey to be cancelled.

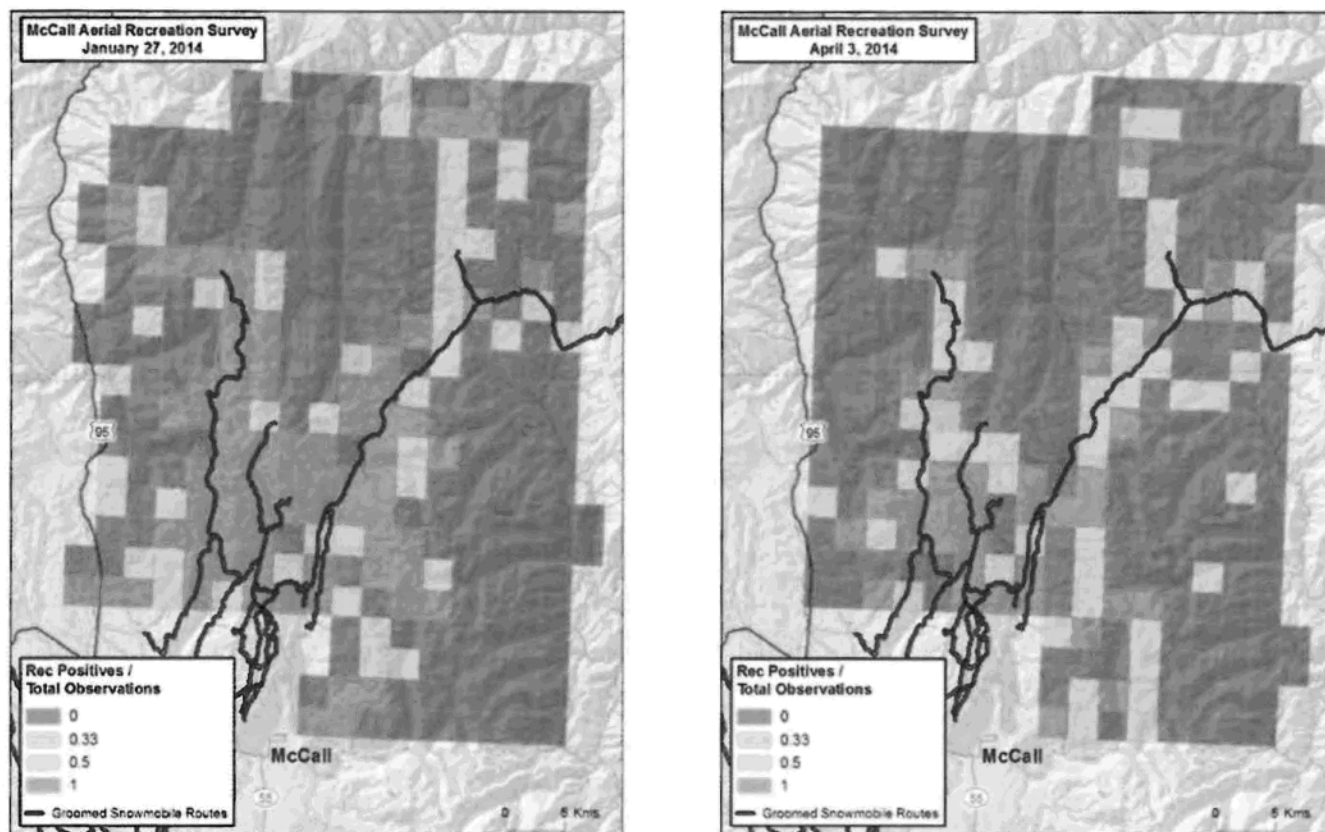


Figure I-3. Aerial winter recreation surveys completed in the Salmon Mountains near McCall, Idaho using standardized survey protocols (Heinemeyer et al. 2011); the score is the percent of repeated presence observations that scored positive for recreation tracks within each 2.5 km² grid cell.

CSEKIRKSGULOFINAL (1)
Abundance and Distribution of Wolverine in the
Kootenay Region

2014 Field Season Report: Central Selkirk
Mountains

Prepared For:

Ministry of Forests Lands and Natural Resource Operations, Columbia Basin Trust
and Fish and Wildlife Compensation Program- Columbia

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Seepanee Ecological Consulting

December 2014

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Executive Summary

wolverine (*Gulo gulo*) is a species of conservation priority provincially and nationally and is harvested regionally, yet no inventory has been conducted to estimate population abundance and connectivity in the southern portion of the Kootenays. Thus, a non-invasive genetic study and collection of trapper carcasses was initiated in the

southern Columbia Mountains in 2012 with the objectives of estimating abundance and assessing meta-population connectivity to inform harvest management and contribute to international conservation efforts. Inventory was conducted in the south Selkirk (2012), south Purcell (2013) and central Selkirk Mountains (2014). This report summarizes results in the central Selkirk Mountains from 2014. Estimates of occupancy (71%) were higher than in the south Selkirk (54%) and south Purcell mountains (38%). Our estimates of population size in the central Selkirk Mountains (19; CI 16-24) were lower than previously published habitat-based values. We also found evidence of poor genetic connectivity between sub-ranges within our study. Annual harvest appears to constitute a high proportion of our estimated population. Given this, the low abundance levels, and the evidence of genetic isolation, the sustainability of the population may be in question.

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Figure 2. Wolverine non-invasive hair trapping results showing site locations and wolverines detected using DNA (orange) and snow tracking (yellow), or both (burgandy) in the south Selkirk (2012), south Purcell (2013) and central selkirk (2014) mountains. An individual may be present at more than one site and some sites may have more than one individual.

Figure 3. Principal Components Analysis (PCA) of 31 wolverine genetic samples from the 3 intensively sampled populations in southeastern British Columbia; central selkirks (CS), south Purcells (SP), and south Selkirks (SS).

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Table 1. Ranking for models of occupancy (.) and detectability (p) for track and genetic data of wolverine in the central selkirk Mountains in 2014. Models were developed in Program PRESENCE and compared using AICC weights of evidence (Burnham and Anderson 1998). . AICC is the difference between a given model and the model with the lowest AICca score, AICC weight (wi) reflects the relative support for each model, K is the number of parameters estimated by the model.

Table 2. Comparison of genetic-based and habitat-modeled population estimates (N) and annual harvest for wolverine populations in the south Selkirk, south Purcell and central Selkirk mountains.

♀
I
ntroduction

Wolverine (*Gulo gulo*) is a species of conservation priority provincially and nationally (BC CDC 2013, COSEWIC 2003) and is classified as Identified wildlife under the Forest and Range Practices Act (MWLAP 2004). Population estimates for British Columbia have been derived from habitat modeling based on mark-recapture in the Omineca and Northern Columbia Mountains (Lofroth and Krebs 2007) but lack verification for much of the province, including the southern portion of the Kootenays. Considering that adjacent U.S. populations are known to be at critically low levels (USFWS 2013), with wolverine absent from much potentially viable habitat, reliable abundance estimates are crucial for species conservation in the region.

In the Kootenays, wolverine populations are characterized by small and declining fur yields (~8 pelts/year) and harvest rates in parts of the region may be unsustainable (Lofroth and Ott 2007). Populations with high connectivity are resilient to local overharvest or high mortality from other sources because of source/sink dynamics (Pulliam 1988). Although genetic evidence indicates increasing population fragmentation in a north to south gradient in B.C. (Cegelski et al. 2006), the extent of gene flow between neighboring ranges in the southern Kootenay region is unknown. Hence, assessing connectivity is important to local population resilience and evaluating harvest sustainability.

Barriers to dispersal include transportation routes, hydroelectric and residential development and land use changes (Gardner et al. 2010, Krebs et al. 2007, Slough 2007, Austin 1998). Similarly, wolverine habitat use and density are associated negatively with winter recreation, forest harvest, and positively with roadless areas (Fisher et al. 2013, Krebs et al. 2007). Mapping occupied habitat in the Kootenays and identifying factors contributing to the persistence of wolverine in these areas is an essential step to identifying where conservation efforts to improve habitat and connectivity should be focused. Additionally, the Kootenay region is one of only a few areas identified as a potential corridor for trans-boundary movement of wolverine into the US (McKelvey et al. 2011, Schwartz et al. 2009, Singleton et al. 2002). Such movement is critical for the persistence of US populations, and this project will provide vital information for wolverine conservation in the trans-boundary region.

Project objectives were to: (1) assess occupancy/abundance of wolverine in the central Selkirk Mountains; (2) assess genetic connectivity between the Selkirk and Purcell

populations; (3) evaluate current harvest levels; (4) evaluate broad-scale habitat factors that are associated with wolverine presence and; (5) cooperate inter-jurisdictionally for wolverine research.

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Methods

Study Area

The study area was within the central Selkirk mountain range within the Central Columbia Mountains Ecozone in the southern Interior Mountains Ecoprovince. It was bounded to the east by Kootenay lake and Highway 31, to the north by the Lardeau Valley and Trout lake, to the west by Upper Arrow Lake and Slocan Valley and the west arm of Kootenay lake and Highway 3A to the south (Figure 1). Major land use in this area was historically mining and forestry and currently there is an expanding recreation element. Several winter use tenures for ski-based operations exist within the study area. Two provincial parks Goat Range Provincial Park (78,947 ha) and Kokanee Glacier Provincial Park (32,035 ha) are within this area. Starting in the valley bottom and progressing to the mountain peaks, biogeoclimatic ecosystem classification (BEC) units present are: Interior Cedar-Hemlock dry warm variant (ICHdw1), Interior Cedar Hemlock moist warm variant (ICHmw2), Engelmann Spruce Subalpine Fir wet, cold variant (ESSFwc1, ESSFwc4), Engelmann Spruce Subalpine Fir wet cold woodland (ESSFwcw), and Engelmann Spruce Subalpine Fir wet cold parkland (ESSFwcp).

At lower elevations the forest is composed of western redcedar (*Thuja plicata*) and western hemlock (*Tsuga heterophylla*) interspersed with Douglas fir (*Pseudotsuga menziesii*), lodgepole pine (*Pinus contorta*), trembling aspen (*Populus tremuloides*) and western larch (*Larix occidentalis*). The shrub layer consists of Douglas maple (*Acer glabrum*), false box (*Paxistima myrsinites*), thimbleberry (*Rubus parviflorus*) and beaked hazelnut (*Crotylus cornuta*). False solomon seal (*Maianthemum racemosum*), horsetail (*Equisetum* spp.) and sedges (*Carex* spp.) made up the herbaceous layer in the mid-elevation forests. At higher elevations Englemann spruce (*Picea engelmannii*) and subalpine fir (*Abies lasiocarpa*) are the main tree species. Main shrubs include black huckleberry (*Vaccinium membranaceum*) false azalea (*Menziesia ferruginea*), white rhododendrum (*Rhododendrum albiflorum*) and heather (*Cassiope* spp.).

Survey methods

The central Selkirk Mountains study area was partitioned into 10 by 10 km cells that approximate the minimum size of a female home range. These 56 quadrats were sampled twice in approximately 21 day sampling intervals, from 10 February to 7 April, 2014 (Figure 1). Within 7 of these quadrats, we sampled two sites. Additionally, two sites from the south Monashee region were sampled in 2014 (24 November-31 January). Because of the rugged nature of the terrain, sites within cells were selected for ease of access by

♀ helicopter, snow machine or skis, using local knowledge of wildlife movements when available. Hair trap sites were created by affixing a bait item (beaver or deer quarter or deer head) to a tree approximately two meters from the ground or snow surface to entice the animal to climb (Fisher 2004). The bait item was nailed to the tree and the tree wrapped several times in barb wire to capture hair. During each check, the barb wire was examined for hairs or hair tufts, and the bait replenished if necessary. Hair was collected with forceps and stored in paper envelopes in a dry environment. We utilized three Reconyx Rapidfire trail cameras (Reconyx Inc., Holmen, WI) and two Bushnell Trophy cameras (XLT Model No. 110456) during the sampling period. The Bushnell Trophy cameras were set to take 30-60s video.

Additionally, we collected genetic samples from wolverine carcasses obtained by trappers. From each carcass a tissue sample was taken and carcasses were necropsied by Ministry of Forests Lands and Natural Resource Operations.

Genetic Analysis

Six hundred and sixty two hair, tissue and scat samples were submitted to wildlife Genetics International (WGI) in Nelson B.C. for genetic identification analysis. Of the hair samples submitted, 69% were sub-selected for analysis. Samples that did not contain guard hairs or >5 underfur were screened out because of insufficient genetic material. From the remaining samples, DNA was extracted using QIAGEN DNeasy Tissue kits, following the manufacturer's instructions (Qiagen Inc., Toronto, ON).

Species identification was based on a sequence-based analysis of a segment of the mitochondrial 16S rRNA gene (Johnson and O'Brien 1997). For samples that yielded wolverine DNA, WGI utilized multilocus genotyping, consisting of a ZFX/ZFY sex marker, and 8 additional microsatellite markers for individual identification.

Locations of sampling sites and genetic samples were mapped in ARCVIEW 3.1 (ESRI Inc. 1998, Jenness 2005).

♀
dna 2012_14_2

Figure 1. Wolverine non-invasive hair trapping results showing site locations where wolverines were detected (red squares, yellow circles) in the south selkirk (2012), south Purcell (2013) and central selkirk mountains (2014). An individual may be represented by more than one sample. Females are in red, males in yellow. Trapper carcass collection is represented by triangles. Two carcasses in 2013 lacked location information and were assigned to a management unit but not plotted on this map. All coloured quadrats were sampled with at least one site.

♀
Occupancy and abundance

We used the single-season model in program PRESENCE (Mackenzie et al. 2002) to estimate the proportion of sample stations occupied by wolverine. A non-detection at a surveyed site could have meant wolverine were not present at the site or that we failed to detect an individual when it was present. PRESENCE uses a joint likelihood model to estimate the probability of missing a species when it is present at the site (p = detectability) and the probability that a site is occupied (ψ = occupancy). To estimate these parameters repeat observations need to be conducted over a period of time during which site occupancy is assumed to be constant. In this way, a non-detection from a site with at least one detection can be treated as a false negative and the detection probability can be estimated.

we used both track detections (set up, and two checks) and genetic data (check 1, check 2) to estimate occupancy. For the 7 quadrats with more than one hair trap site, we randomly selected one site for occupancy analysis. We constructed models with group effects on occupancy and time dependence on detectability.

Estimates of occupancy can act as a surrogate for abundance for territorial species such as wolverine when the sites sampled approximate territory sizes (Mackenzie et al. 2006). We selected a grid resolution (10 x 10 km) that corresponded to a minimum home

range
size for female wolverine.

We used the genotyped individuals from two encounter occasions (check 1, check 2) to estimate abundance using a simple Lincoln-Peterson mark-recapture method ($N = Mn/R$, where N is the estimated population size, M is the number of animals identified in the first sampling session, R is the number of animals identified in the first session which are recaptured in the second session and n is the total number of animals identified in the second sampling session; Seber 1982).

Population genetics

To visualize genetic relationships amongst study areas we performed a multivariate ordination using principal component analysis (PCA) in GenALEX 6.5 (Peakall and Smouse 2006, Peakall and Smouse 2012). This process finds and plots the major axis of variation within a multidimensional data set (i.e. multiple samples and multiple loci) to identify patterns within the data.

♀
R
results

During the course of the field season we monitored 56 sites in the central Selkirks and two in the southern Monashee ranges (Figure 1). Thirteen field days were required for setup and an additional 28 days for site monitoring. Detections of wolverine occurred at 59% of sites by snow tracking and/or genetic analysis (Figure 2). Wolverine tracks were detected in 39% ($n = 22$) of quadrats and were the exclusive detection method in 5 quadrats (Figure 2). Wolverine DNA was collected at 51% ($n = 29$) quadrats and were the exclusive detection method at 12 of those sites (Figure 2). At 30% percent of quadrats (17 of 56), both wolverine DNA and tracks were detected. Other carnivores detected, using snow tracking, included wolf (*Canis lupis*), cougar (*Puma concolor*), lynx (*Lynx canadensis*), and coyote (*Canis latrans*; Appendix 1).

We collected images using trail cameras at five sites (Figure 2) with a total monitoring period of 5,952 hours. Species detected included American marten (*Martes americana*), stellars jay (*Cyanocitta stelleri*), wolverine, dog (*Canis familiaris*), raven (*Corvus corax*), and golden eagle (*Aquila chrysaetos*). We detected wolverine at 1 site, in the upper Lemon creek drainage (Figure 2). This site also provided hair samples for DNA analysis. A second camera, apparently working, in the Silverton creek drainage failed to detect wolverine, although wolverine DNA was obtained and evidence from the bait tree (deep scratches) suggested considerable activity.

Genetic analysis

We obtained genetic results from 304 hair, tissue and scat samples. One hundred and eighty-nine samples were identified by mitochondrial DNA analysis as species other than wolverine. These species included American marten ($n = 176$), bobcat ($n = 6$), cougar ($n = 2$), northern flying squirrel ($n = 2$), short-tailed weasel ($n = 2$) and coyote ($n = 1$). Wolverine DNA was detected at 29 of 56 sites in the central Selkirks and at one of two sites in the southern Monashees. Eighty-four wolverine hair samples were assigned individual identification. From the 29 sites in the central Selkirks, we were able to identify 16 individual wolverines, 10 females and 6 males (Figure 2). At the site in the southern Monashees, we were able to identify a male and female wolverine.

Seven wolverine carcasses (six males, one female) were submitted by the trapping community in 2014 (Figure 1). This is in addition to four (two males, two females) and ten (six males and four females) carcasses submitted in 2012 and 2013, respectively (Figure 1).

♀
occupancy camera 2014_2

Figure 2. Wolverine non-invasive hair trapping results showing site locations and wolverines detected using DNA (orange) and snow tracking (yellow), or both (burgandy) in the south Selkirk (2012), south Purcell (2013) and central Selkirk (2014) mountains. An individual may be present at more than one site and some sites may have more than one individual.

‡

Occupancy and abundance

Two models were considered as competing models in the analysis of occupancy using both tracks and genetics data (. AICc < 2; Table 1). The best model predicted constant occupancy with a change in detection probabilities with sampling sessions. The second competing model predicted two groups of sites with different detection probabilities in the sampling sessions. The model-averaged occupancy estimate was 71% (SE = 10.0). The probability of detection based on the weighted average of these two models was 17.8% (SE = 5.9) in repetition one, 38.1% (SE = 8.2) in repetition two and 70.0% (SE = 6.4) in repetition three. Using tracks exclusively, the model-averaged occupancy estimate was 71.6 %, (SE = 27.0).

Table 1. Ranking for models of occupancy (.) and detectability (p) for track and genetic data of wolverine in the central Selkirk Mountains in 2014. Models were developed in Program PRESENCE and compared using AICc weights of evidence (Burnham and Anderson 1998). . AICc is the difference between a given model and the model with the lowest AICc score, AICc weight (wi) reflects the relative support for each model, K is the number of parameters estimated by the model.

Model

. AICc
a

AICc weight (wi)

K

. (.) p(survey specific)b

0.0

0.5948

4

. (2 groups) p(survey specific)c

0.77

0.4048

8

. (.) p(.)d

14.83

0.0004

2

. (2 groups) p(.)e

18.83

0.0000

4

a The lowest AICc score was 188.5

bconstant ., survey specific p; the species has constant occupancy but different detection rates

c2 groups, survey specific p = there are two groups of sites and different detection rates

d constant ., constant p= The species has constant occupancy and detection rates

e 2 groups, constant p= there are two groups of sites where the species has the same detection probabilities

♀
Using mark-recapture, the population was estimated at 19 (SE = 2.34, 95% CI = 16-24 individuals). We compared our population estimates and published habitat-based population estimates (Lofroth and Ott 2007) for the sampled population units (Table 2). Mean annual number of wolverine trapped in the central Selkirks was 4.9 for 2005-2014, 2 for 1995-2004 and 2.8 for 1985-1994. The same time intervals for the south Purcells yielded 1.7, 1.6 and 1.5 animals respectively, while the south Selkirks had no trapper harvest during these periods (data missing for 2010, 2011 in all regions).

Table 2. Comparison of genetic-based and habitat-modeled population estimates (N) and annual harvest for wolverine populations in the south Selkirk, south Purcell and central Selkirk mountains.

Population

Mark-recapturea N
(95% CI)

Habitat-basedb N

(95% CI)

Mean annual harvest

2005-2014

(1995-2004) (1985-1994)^c

South Selkirks

4 (na)

10 (7-14)

0 (0) (0)

South Purcells

18 (9-27)

27 (20-39)

1.7 (1.6) (1.5)

Central Selkirks

19 (16-24)

32 (22-49)

4.9 (2)(2.8)

a This study

b Lofroth and Ott, 2007

c data from 1985-2009 based on trapper survey, data missing for 2010, 2011 and 2012-2014 based on carcass collection

♀
Population genetics

Principal Component Analysis suggests genetic structure amongst populations with samples in the south Purcells (n =11), south Selkirks (n =4) and central Selkirks (n =19) clustering according to geographic region (Figure 3).

Figure 3. Principal Components Analysis (PCA) of 31 wolverine genetic samples from the 3 intensively sampled populations in southeastern British Columbia; central Selkirks (CS), south Purcells (SP), and south Selkirks (SS).

D Discussion

This research represents the first on-the-ground attempt to inventory wolverine populations in the southern Kootenay region. The data is beginning to fill a critical knowledge gap for a species that is a conservation priority in the U.S. and Canada. In this third year of our project, we were able to almost double our number of genotyped individuals from 26 in 2013 to 51.

The central Selkirk mountains had higher occupancy estimates (71%) than both the south Selkirks (54%) and the south Purcells (35%). The central Selkirks were rated as high habitat quality for wolverine by Lofoth and Krebs (2007). The south Purcells, despite having the lowest occupancy rates were also rated as high but interspersed with moderate quality habitat. The south Selkirks were rated as moderate habitat quality.

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In all sampling years, detection probability increased as the season progressed (Kortello and Hausleitner 2012, Kortello and Hausleitner 2014). While our initial detection probability (17.8%) is quite low, being track-based only, subsequent detection probabilities (38.1%, 70.0%) are comparable with other studies using similar methods for hair trapping wolverine (e.g. Fisher et al. 2013). Increases in detectability in later periods might be attributable to increased mobility due to snow conditions, increased mobility of denning females, and trap-happy individuals (Fisher et al. 2013).

We detected 2 wolverines using cameras in 2 years (2013 cameras located at 11 %, 7/65 sites in south Purcells and 2014 cameras at 9%, 5/56 of sites in central Selkirks). Although this information has been useful, cameras have not been an effective tool for calculating occupancy as we have so few on the landscape. Cameras have been shown to improve detectability for wolverine occupancy studies in the Rocky Mountains (Fisher et

al. 2014).

Our population estimate based on mark-recapture of 19 (CI 16-24) individuals, is below the published habitat-based estimate of population size for the central Selkirks: 32 (CI 22-49), although confidence intervals overlap (Lofroth and Ott 2007). Over the past three seasons, our population estimates (Kortello and Hausleitner 2012, Kortello and Hausleitner 2014) have consistently been lower than the habitat-based estimates calculated by Lofroth and Ott (2007). However, we recognize that our non-invasive sampling may be underestimating occurrence (Fisher et al. 2014), and our mark-recapture estimates may be biased low because of a positive trap effect. Future analysis will model the spatial component of capture probability (Efford and Fewster 2013) for improved estimates.

Harvest rates in the central Selkirks are higher than both south Purcell and south Selkirks. The average annual harvest over the last 10 years, 4.9, represents a high proportion (26%) of our estimated population of 19 animals in the central Selkirks. Sustainable harvest of wolverine is thought to be 10% or less (Hatler and Beal 2003) of the fall population. Consequently, although the actual number of individuals harvested annually is quite variable (range 0-17), and our estimate of population is preliminary, these harvest levels may be risk-prone.

Fisher et al. (2013) found wolverine more abundant in rugged areas protected from anthropogenic development, similarly, although most of the terrain in our study area is quite rugged, the majority of wolverine detections (72%) have been within or immediately adjacent (within 10 km; conservatively one female home range width) to large protected areas; West Arm Provincial Park, Darkwoods Nature Conservancy, Purcell Wilderness Conservancy, St. Mary's Alpine Provincial Park, Kootenai Glacier Provincial Park and Goat Range Provincial Park. These areas (including the 10 km

buffer) encompass approximately 56% of our study area. This suggests that protected areas may be important for wolverine populations and this relationship warrants further investigation in future analyses.

None of the individuals detected in the central Selkirks in 2014 have been detected previously. To date we have been unable to document connectivity between south Selkirk, central Selkirk and south Purcell populations on the basis of individual movements. Additionally, our genetic analysis is limited by quite small sample sizes and the number of markers used. In spite of this, visual representations of genetic relatedness demonstrates evidence of genetic structure amongst the three subranges (south Selkirks, central Selkirks, and south Purcells; Figure 3). This data supports other research suggesting population fragmentation for wolverine in southeastern British Columbia

(Cegelski et al. 2006). Genetically distinct populations imply a low probability of successful dispersal amongst ranges and consequently, if populations are in decline, reduced potential for demographic rescue from adjacent ranges.

Recommendations

Our data, suggests lower populations than expected and, surprisingly, low connectivity between this and other southern British Columbia populations, hence harvest should be carefully considered and managed with trapper input. The recent provincial effort to create a genetic database of a sample of harvested wolverine will augment the information gathered here, by using landscape genetics to identify functional population units, barriers and harvest sustainability at a larger scale (R. Weir 2014, pers. comm.).

Genetically structured populations point to a need for future efforts to restore connectivity and distinctly clustered wolverine detections also allude to the possible impact of land management practices and/or recreational access on wolverine distribution. This needs to be investigated further.

Data for wolverine harvest in 2012-2014 has come from carcass payments and is at the discretion of individual trappers. Ongoing, accurate harvest data is necessary to monitor population sustainability.

Considering tracks only, we would have detected almost 60% of the total occurrences in our occupancy modeling. Similarly, a concurrent caribou census (MLFNRO data) in the northern part of our study area under good tracking conditions obtained almost as many detections as our genetics work. Accordingly, when we based our occupancy estimates on

tracks only, rather than tracks and genetics, we produced an almost identical occupancy rate but with higher variability, suggesting more repetitions would be necessary to increase precision. Track surveys present a potential time and cost saving avenue for future monitoring based on occupancy, if genetic information is not a priority and particularly if census is already underway for other species.

This research is being expanded into the Valhalla and southern Monashee region in 2015. With continued carcasses collected from trappers, and in collaboration with wolverine researchers in adjacent regions, we will increase the sample size of genotyped individuals, and continue to increase the strength of genetic analysis and spatial

mark-
recapture.

This information is crucial for identifying viable movement linkages and protecting habitat. These results will directly inform species harvest management. Further work should contribute to the management of crown land, acquisition of conservation properties, linkages and highway mitigation in the region. This study compliments similar research on grizzly bears to provide a multi-species perspective for regional conservation planning. Healthy, connected wolverine populations are an important ecosystem component of the Columbia River watershed, will sustain trapping opportunities for B.C. residents, and are critical for species persistence in the conterminous USA (Cegelski et al. 2006).

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♀

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iterature
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Appendix 1. Carnivores detected by snow tracking during wolverine surveys in the central Selkirk and south Monashees November 2013-April 2014.

Location

UTM
easting

UTM
northing

Date (s)

Species

Beaver Lake

465242

5559810

March 26,
April 20

coyote (1), lynx (1),
wolf (3)

Beton Junction

450480

5616668

March 22

coyote

Gerrard

480379

5595102

April 18

coyote (1)

Kuskanux Creek

445068

5569617

March 23

coyote (1)

Ledrum Creek

503722

5514909

March 14,
April 10

coyote (1)

Poplar Creek

491037

5584408

March 22

wolf (1)

Six mile Lakes

477195

477195

Feb 11

coyote (1)

Sproule Creek

467228

5489123

March 11

cougar (1)

Wilson Creek

473487

5552438

Feb 20,
March 26

lynx (1)

Wilson Lake

451081

5565753

April 16

coyote (1)

Veres, Melanie FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Monday, June 1, 2015 9:31 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Application #440571 (Kootenay Heli-ski)
Attachments: WKES-4405571 submitted.pdf

PROVINCE OF
BRITISH COLUMBIA

JUN 03 2015

RECEIVED
CRANBROOK, BC

Comments for processing.

From: s.22
Sent: Friday, May 29, 2015 9:20 PM
To: FrontCounter BC FLNR:EX; FLNR LandTenuresBranch FLNR:EX
Cc: EcoSociety
Subject: Application #440571 (Kootenay Heli-ski)

Hello,

I would like to submit this letter for consideration in relation to the above-named application number.

I tried to find this on the Front Counter applications website but was unsuccessful so I am emailing it to you instead. My understanding is that comments are due in today.

Would you please acknowledge this email and letter sent?

Thank you,
s.22
for the West Kootenay Ecosociety

West Kootenay EcoSociety
s.22

info@ecosociety.ca

Front Counter BC
1902 Theatre Road
Cranbrook, BC V1C 7G1

May 28, 2015

Dear Front Counter BC:

The West Kootenay EcoSociety is opposed to the recent application of Kootenay Heli-Ski Inc. for a heli-ski guiding operation, based out of Nelson, BC, file # 4405571. The Province must consider the effects of this proposed operation in directly bordering the northern, eastern and southern boundaries of Kokanee Glacier Provincial Park. In particular, we have concerns regarding the cumulative effects of additional adjacent/overlapping commercial tenures on recreational users, sensitive wildlife and plant species. The West Kootenay EcoSociety is of the view that an additional helicopter-based operation will negatively affect our community's values, therefore the operation should be denied for the various reasons outlined below.

Although some may perceive that there are economic benefits of this proposed development, there already exists a thriving tourism sector in the Nelson area, which is based primarily on non-mechanized backcountry use of pristine and undisturbed wilderness. The presence of another commercial and, in this case, heli-access tenure will act as a very real barrier to recreational access for the general public. Regardless of the written rules, regulations allowing recreational users access to Crown tenure lands does not stop commercial operators from citing safety reasons or client-harassment concerns to exclude the public from their operating areas. The increased motorized noise pollution and disturbance that Nelson residents would be subjected to, coupled with a further loss of non-mechanized recreational opportunities, highlights the increased need for consensus-based land-use planning now, prior to approving any further recreational developments adjacent to protected areas. Proposals such as the one currently under consideration benefit only a few, while impacting the tranquility of the vast majority and threatening a well-established and core part of our local economy.

As outlined in the wildlife impact assessment completed by s.22 mountain goats, federally listed wolverine, grizzly bear, western toad, and various other listed species occupy habitats within the proposed tenure. In its application, Kootenay Heli-Ski Inc. has indicated its planned mitigation for mountain goats. Although The West Kootenay Ecosociety recognizes the willingness of Kootenay Heli-Ski Inc. to exclude an area to accommodate the concerns raised regarding impacts to this sensitive species, the mitigation proposed is based on only a one-day sample, and further long-term population habitat use and impact studies must be conducted to delineate the winter range of this population and the effectiveness of the mitigation measures being proposed. As stated, the increased human traffic, snow compaction and building of landing zones will impact riparian areas and removal of danger trees at landing zones will affect wildlife tree abundance and diversity, including potential impacts to federally listed whitebark pine, and possibly

other listed plant communities and vegetation species that are rare, but were not surveyed for. No mitigations are provided for these many significant impacts.

The wolverine is a species of conservation priority within the province of BC, nationally and internationally. Populations have been declining, most remnant animals are found in parks and protected areas, and harvest quotas based on habitat models have apparently been set at unsustainable levels, relative to actual number of individuals remaining (as determined from DNA hair samples). Habitat fragmentation associated with multiple developments and disturbances is threatening to reduce animal movement and genetic diversity of the wolverine and other wide-ranging animals, yet these capacities and characteristics are vital for the long-term health and sustainability of these species. Compounding the habitat impacts are direct disturbance impacts to sensitive species, and the questionable mitigation that is being proposed to address the problem. The operator, helicopter pilots and guests are being asked to look for animals and then avoid them, before they impact them. What is the likelihood that untrained viewers will (a) detect sensitive mountain goat, wolverine and grizzly bear, and (b) avoid them before these animals are disrupted and displaced? There is no evidence to suggest that such mitigation is effective, and that operators can comply, even if willing. If faced with decisions regarding accommodating their clients during unfavourable weather (snow, wind, fog, etc.), poor visibility, under sometimes marginal ski conditions, with limited options of where to go, it is unreasonable to expect that they will have the flexibility to comply, despite the best intentions.

The proposal makes no mention of how and where backcountry fuel stores will be cached and how human waste will be dealt with, and how these issues may affect sensitive alpine ecosystems. The high decibel level of helicopter travel will add to Nelson resident discomfort, and add to the number of complaints already received by the City and the Regional District of Central Kootenay regarding the noisy waterfront due to the airport, traffic congestion, construction, city works, highways, marina, the mall and other developments.

Kokanee Glacier Provincial Park is a treasured wilderness in our region and no further incremental development should be encroaching to the park boundaries and compromising enjoyment of this serene place. Cumulative development impacts are growing due to increased development, traffic, and multiple users with overlapping land tenures. This park is already impacted by helicopter flights shuttling guests and supplies to Kokanee Glacier Cabin, Mountain Trek's recent recreation tenure along the eastern park boundary, ziplining, adjacent snowmobiling and ATV tours, and guided hiking and skiing in the areas immediately surrounding Kokanee Glacier Provincial Park. We challenge our government to act responsibly and pro-actively on behalf of our community, wilderness and biodiversity values, by saying no to this proposed development.

Sincerely,

s.22

s.22

on behalf of the West Kootenay Ecosociety

Veres, Melanie FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Tuesday, June 2, 2015 5:19 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Tuesday, June 2, 2015 4:13 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Tuesday, June 2, 2015 - 16:12

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

The following points describe my major concerns:

A commercial recreation tenure will act as a barrier to general public access. Regulations aside, commercial operators may harass the general public or cite safety issues to exclude the public. Increased noise and the further loss of public recreational areas again demonstrate the need for a land use plan in the lands surrounding Kokanee Glacier Provincial Park.

The wildlife impact assessment by s.22 raised concerns about the effects of the proposed tenure on wildlife including: mountain goats; wolverines; and listed amphibians, reptiles and birds. Further study is needed to determine the full extent of mountain goat usage in the proposed areas. Wolverines are a species of conservation priority in BC, in Canada and internationally. The high decibel level of helicopter travel may negatively affect mountain goat, wolverine and grizzly bear behaviour. In addition, increased human-animal interactions may negatively affect a wide variety of wildlife species in the proposed areas.

s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

Kokanee Glacier Provincial Park is experiencing increased cumulative affects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of a cumulative impacts study of

existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Veres, Melanie FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Tuesday, June 2, 2015 2:20 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Tuesday, June 2, 2015 1:15 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Tuesday, June 2, 2015 - 13:14

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Veres, Melanie FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Tuesday, June 2, 2015 2:20 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Tuesday, June 2, 2015 1:17 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Tuesday, June 2, 2015 - 13:17

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Veres, Melanie FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Monday, June 1, 2015 1:19 PM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Monday, June 1, 2015 12:18 PM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Monday, June 1, 2015 - 12:18

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Veres, Melanie FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Monday, June 1, 2015 9:34 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Saturday, May 30, 2015 11:01 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Saturday, May 30, 2015 - 11:00

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Kokanee Glacier Provincial Park is experiencing increased cumulative affects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of a cumulative impacts study of existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Veres, Melanie FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Monday, June 1, 2015 9:34 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Sunday, May 31, 2015 7:28 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Sunday, May 31, 2015 - 07:28

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Kokanee Glacier Provincial Park is experiencing increased cumulative affects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of a cumulative impacts study of existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Veres, Melanie FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Monday, June 1, 2015 9:33 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Sunday, May 31, 2015 8:11 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Sunday, May 31, 2015 - 08:10

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

The following points describe my major concerns:

A commercial recreation tenure will act as a barrier to general public access. Regulations aside, commercial operators may harass the general public or cite safety issues to exclude the public. Increased noise and the further loss of public recreational areas again demonstrate the need for a land use plan in the lands surrounding Kokanee Glacier Provincial Park.

The wildlife impact assessment by s.22 raised concerns about the effects of the proposed tenure on wildlife including: mountain goats; wolverines; and listed amphibians, reptiles and birds. Further study is needed to determine the full extent of mountain goat usage in the proposed areas. Wolverine is a species of conservation priority in BC, in Canada and internationally. The high decibel level of helicopter travel may negatively affect mountain goat, wolverine and grizzly bear behaviour. In addition, increased human-animal interactions may negatively affect a wide variety of wildlife species in the proposed areas.

s.22 raised concerns that Kokanee Glacier Provincial Park may not be able to maintain the genetic diversity required for long-term health and sustainability in the face of the habitat fragmentation associated with multiple land user groups.

Kokanee Glacier Provincial Park is experiencing increased cumulative affects due to increased traffic, an increased number of users and multiple overlapping land tenure agreements. Park values may become compromised by so much usage close to park boundaries. An appropriate next step would be the completion of a cumulative impacts study of existing and proposed commercial, recreational and development demands on the area surrounding Kokanee Glacier Provincial Park.

Without further consideration of the residents of Nelson and further studies of the effects of increased human-wildlife interactions in the area surrounding Kokanee Glacier Provincial Park, the West Kootenay EcoSociety cannot support the approval of this Recreation Tenure.

Veres, Melanie FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Monday, June 1, 2015 9:33 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

Comments for processing.

-----Original Message-----

From: info@ecosociety.ca [mailto:info@ecosociety.ca]
Sent: Saturday, May 30, 2015 3:11 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Saturday, May 30, 2015 - 03:10

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. Our concerns include the detrimental effects of such a development on recreational users, wildlife and the cumulative effects of existing and proposed adjacent and overlapping commercial tenures on Kokanee Glacier Provincial Park.

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Veres, Melanie FLNR:EX

From: FrontCounter BC FLNR:EX
Sent: Monday, June 1, 2015 9:32 AM
To: FCBC Cranbrook FLNR:EX
Subject: FW: Comments on Kokanee Heli-ski file #4405571

-----Original Message-----

From: info@ecosociety.ca [<mailto:info@ecosociety.ca>]
Sent: Monday, June 1, 2015 8:30 AM
To: FrontCounter BC FLNR:EX
Subject: Comments on Kokanee Heli-ski file #4405571

Monday, June 1, 2015 - 08:30

s.22

Comments:

I urge Front Counter BC to deny the recreation tenure application by Kootenay Heli-Ski Inc. (BC, file # 4405571) adjacent to the north, east and southern boundary of Kootenay Glacier Provincial Park. This area already sees such high use with existing recreation that adding another operation would push the limits of an already stressed and sensitive ecosystem. Thanks for your consideration.

Response Roll-up Report

FrontCounter BC

Referral Type:	Adventure Tourism/Commercial Recreation	Referral Number:	73599979
Reference Number:	157465	Referral Status:	Waiting For Response
Legislated Only:	No		

Recommendations

Request	Other	
0	0	Interests unaffected.
1	0	No objection to approval of project.
2	0	No objection to approval of project subject to conditions outline below.
1	0	Recommend refusal of project due to reasons outline below.
0	0	N/A

Requests

Organization:	Ministry of Forests, Lands and Natural Resource Operations, Habitat Management - Nelson	Request Number:	001
Respondent:	Kristen Murphy	Legislated:	No
Closed By:	Kristen Murphy	Referral Level:	Optional
Recommendation:	No objection to approval of project subject to conditions outline below.		

Yes	No	N/A	Question
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Does this application impact your agency's legislated responsibilities? If yes, how will the proposal impact your legislated responsibility and please identify the relevant legislation (section) and what mitigative measures will be required to address these impacts in the response text box at the bottom of the page.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	If the proposal proceeds, will the proponent require approval or a permit from your agency? If yes, please explain in response text box at the bottom of the page.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Will on-going compliance monitoring be required by your agency as a result of your legislated responsibilities? If yes, please explain what will be required in the response text box at the bottom of the page.
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Will this application affect public use of this area? If yes, please explain in the response text box at the bottom of the page.

Explanation of Response

- Mountain goats populations are currently experiencing dramatic declines in areas throughout the Kootenay Boundary. Helicopter pilots should avoid using thermal updrafts within 500 horizontal metres of steep, rocky slopes to avoid disturbing goats that may, or may not, be visible.
- In order to minimize disturbance to listed wildlife species, the proponent, Kootenay Heli-Ski Inc, should incorporate all the recommendations identified in Seepanee Ecological's "Kootenay Heli-Ski Inc Wildlife Assessment 2015" with the following exceptions:
 - Page 23, Bullet 4 of the Wolverine operational recommendations should be changed from, "Cease flight activity of landing within 500m of wolverine or known denning site", to "cease flight activity of landing within 1000m of wolverine or known denning site"
 - Page 23, Bullet 5, sentence 2 of the wolverine operational recommendations should be changed from, "Cease all non-motorized activity within 100m of wolverine or known den sites to "cease all non-motorized activity within 1000m of wolverine or known den sites.
 - Page 27, Bullet 9, of the Mountain goat operational recommendations should be changed from "(minimum 100m horizontal set back BC MOE 2006)" to "During non-motorized activities, stay at distances sufficient to prevent changes in mountain goat behaviour (minimum 1000m horizontal setback)".
- In respect of the use of the Land by you or by anyone you permit to use the Land, keep the Land and the Improvements in a safe, clean and sanitary condition satisfactory to us, and at our written request, rectify any failure to comply with such a covenant by making the Land and the Improvements safe, clean and sanitary.
- Not commit any wilful or voluntary, or unintentional waste, spoil, infestation or destruction on the Land or do anything on the Land that may be or become a nuisance or annoyance to an owner or occupier of the Land or land in the vicinity.
- Pay all accounts and expenses as they become due for work performed on or materials supplied to the Land at your request, on your behalf, or with your permission, except for money that you are required to hold back under the Builders Lien Act.

Organization: Regional District of Central Kootenay - Nelson
Request Number: 004
Respondent: Mark Crowe, Planner
Legislated: No
Closed By:
Referral Level: Mandatory
Recommendation: No objection to approval of project subject to conditions outline below.

Yes	No	N/A	Question
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Does this application impact your agency's legislated responsibilities? If yes, how will the proposal impact your legislated responsibility and please identify



the relevant legislation (section) and what mitigative measures will be required to address these impacts in the response text box at the bottom of the page.

- | | | | |
|-------------------------------------|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | If the proposal proceeds, will the proponent require approval or a permit from your agency? If yes, please explain in response text box at the bottom of the page. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Will on-going compliance monitoring be required by your agency as a result of your legislated responsibilities? If yes, please explain what will be required in the response text box at the bottom of the page. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Will this application affect public use of this area? If yes, please explain in the response text box at the bottom of the page. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | For Municipal/Regional Government Use Only: Is the application area zoned for the proposed purpose? If no, please provide the current zoning. In the event the applicant wishes to apply for re-zoning, please also provide the estimated time required for this decision. Your comments can be entered in the response text box at the bottom of the page. |

Explanation of Response

Attachments Exist

Planning Staff Comments:

The proposed use is located in the remote backcountry of Electoral Areas E, F, H, & D adjacent to Kokanee Glacier Provincial Park, as shown on the attached RDCK Location Map. These Electoral Areas are represented by Official Community Plan Bylaws which designated the land appropriately for the intended use under the land designations Resource Area and Open Space (See Attached). While the OCP is a policy document and not designed to be regulatory, the OCP land designations shall ensure that permitted land uses and activities include: forestry, mining, exploration, range land, trapping, hunting, farming, tourism and commercial and non-commercial backcountry recreational activities.

Crown land policies in the OCP strongly encourage the Province to seek full community support before any change in land use on Crown land, including issuing licences or permits for any development or activity, land sales, and land use designation amendments that may affect the community. The RDCK notes that while the applicant has provided an opportunity for members of the community to comment on the proposal by means of notices posted, there has been no opportunity for the community to attend a public hearing on the proposal.

The management plan identifies that all four operating area zones are adjacent to Kokanee Glacier Provincial Park. However, the plan is silent on how the management of the operation will occur successfully within such close proximity to the park. For example, the proximity of the flight path to Kokanee Glacier Park and the fragmented nature of the application area and flight path routing may need more thorough consideration so as not to interfere with the Park. It may be appropriate to acknowledge the Kokanee Glacier Provincial Park Management Plan (January 2010) as this document provides some certainty as to how the adjacent park lands are managed (<http://www.env.gov.bc.ca/bcparks/planning/mgmtplns/kokanee/KokaneeGlacierPPMPJanuary2010.pdf>)

The RDCK Board may discuss this application at the June 18th, 2015 Board Meeting. In anticipation of a formal Board Resolution, staff would encourage the Province to hold a public meeting in the effected communities. This would help to ensure that the management or disposition of Crown land is done in a manner that is consistent with the broader policies of the Official Community Plan areas, existing settlement patterns, conservation of environmentally sensitive areas, and with recognition of the values associate with Kokanee Glacier Provincial Park.

Furthermore, the Land Officer may want to contact the City of Nelson to ensure that any applicable licensing and development approvals, if applicable, have been considered for the operation base and access. Please find attached policies from the RDCK Official Community Plan Areas."

Walter Popoff, RDCK Director Area H/Slocan Valley Comments:

The management plan is silent on re-fueling the concern I have is if re-fueling is to take place in the proposed tenure area, what precautions will be taken to ensure compliance with the BC field guide to fuel handling transportation and storage in remote areas. I would also request the applicant hold a public information meeting in al 4 of the affected areas , D,E, F, and H to provide the Province and RDCK Directors information if this application has Community support.

Aimee Watson, RDCK Director Area D Comments:

- needs public consultation
- cumulative affects on wildlife need better assessment
- daily flights increase GHG and is in conflict with our OCP recommendations for lower GHG
- I see no refueling plans included; how would they do this?
- and my biggest concern/question is: who monitors the plans to ensure compliance?

Tom Newell, RDCK Director Area F and Ramona Faust, RDCK Director Area E Comments:

- see attached document

Organization:	Ministry of Energy Mines, Kootenay/Boundary - Regional Geologist	Request Number:	006
Respondent:	Fiona Katay	Legislated:	No
Closed By:	Fiona Katay	Referral Level:	Optional
Recommendation:	No objection to approval of project.		

Yes	No	N/A	Question
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Does this application impact your agency's legislated responsibilities? If yes, how will the proposal impact your legislated responsibility and please identify the relevant legislation (section) and what mitigative measures will be required to address these impacts in the response text box at the bottom of the page.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	If the proposal proceeds, will the proponent require approval or a permit from your agency? If yes, please explain in response text box at the bottom of the page.
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<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will this application affect public use of this area? If yes, please explain in the

response text box at the bottom of the page.

Explanation of Response

This project is located in an area with High mineral potential, with active mineral claims, mineral showings, and mineral exploration.
The proponent should be aware that over the short term, there may be resource-based exploration activities in the area. Over the longer term, further mining-related activities may also occur, and be further expanded.

Organization:	Ministry of Forests Lands and Natural Resource Operations - Recreation Sites & Trails - Castlegar	Request Number:	007
Respondent:	Justin Dexter	Legislated:	No
Closed By:	Justin Dexter	Referral Level:	Optional
Recommendation:	Recommend refusal of project due to reasons outline below.		

Yes	No	N/A	Question
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Does this application impact your agency's legislated responsibilities? If yes, how will the proposal impact your legislated responsibility and please identify the relevant legislation (section) and what mitigative measures will be required to address these impacts in the response text box at the bottom of the page.
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<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Will this application affect public use of this area? If yes, please explain in the response text box at the bottom of the page.

Explanation of Response

The amount of public concern and complaint regarding this application has been significant. Winter use by the recreating public is significant in all the areas proposed. Increasing conflict and displacement of public recreationists is inevitable if this application is approved. The applicant put very little effort into the public use section of the application which is concerning as there are direct conflicts with established and identified Recreation features (Rec Reserve Outlook) in the areas proposed. Based on this alone I do not support this application.

On a broader note:

The public in the Kootenays are getting very frustrated by the increasing amount of winter mechanized commercial operations that exist and are being applied for. Based on the reality of how things are in the field they have every right to be frustrated. As a land manager I am frustrated and can't help but feel that there is a bit of a "land grab" scenario playing out which could have unintended consequences and impacts to the public in the future. In the winter I spend approximately 30-40% of my time addressing, mediating, and educating all users on issues arising from conflict between winter commercial recreation operators and the public or other user groups. This is unacceptable.

Defaulting to the legalities of a Licence of Occupation which is a nonexclusive licence that does not inhibit public use simply doesn't work and there is endless examples of this out there. In fact finding examples where it does work effectively in the Kootenays is the rarity.

I firmly believe that no winter mechanized commercial applications should be considered in the Kootenays pending the outcome of some sort of planning process which involves public engagement and consultation relating to the big picture of winter mechanized commercial land use.

I would be happy to discuss this further with the Land Officer to explore ways to mitigate some of the concerns addressed above.

Contact

FrontCounter BC

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Contact: Jessie Lunan
E-mail: Jessie.Lunan@gov.bc.ca