

**IS POWDER RENEGADE LODGE PROPOSAL VIABLE ?**

**ARE SNOW DEPTHS SUFFICIENT ?**

**OUR OCT 2021 REVIEW SAYS NO**

The attached Review/Report has been sent to Minister of Forests, The Regional Executive Director KBR and others.

Government has claimed that “ investigations, research and development of management plans for a proposed business business on Crown Land are required prior to submission of a formal application”.

Had Government done its job, our work would not have been necessary and snow depths, revised and reduced season and substantially reduced revenues would all have indicated that this application should not have proceeded.

OUR REVIEW FOLLOWS and asks that the application be turned down now.

**IS PRL PROPOSAL VIABLE ?      ARE SNOW DEPTHS SUFFICIENT ?      Oct 2021**  
**BOUNDARY ENVIRONMENTAL ALLIANCE SAYS NO**

**Executive Summary**

1. **Our analysis of historical data reveals snow levels in the area to be significantly below applicant's stated claim of 1.5 m necessary for operations.** The data indicate that a depth of 1.5 m has not been achieved during November, December and January in the past 17 years and only occasionally reached in February, March and April over that time period (see page 5)
2. **Impact of climate change on snow levels and duration will shorten ski season.** Many competing ski resorts, including Big White, are expanding their operations to include more summer activities in response to changing winter conditions. Although the applicants state they have no intention of expanding to summer activities in the future, as the snow season shrinks, it will not be surprising if they want to expand to summer activities to justify the large financial investment in their "multi-million dollar off grid lodge" (<https://catskidreams.com/powder-dreams-tv-show/>)
3. **Snow density and quality of powder have not been addressed by applicants.** Optimal density for powder snow is considered to be 8%. Historical snow density measurements at Grano Station exceed this optimal level: for example, measurements taken on March 6, 2021 indicated snow density of 38% after trending up from approximately 20% in November.
4. **FOI request to obtain submissions from government referrals and First Nations experienced lengthy delays (February 24 to August 5, 2021) and the materials are still not publicly available on government website.** A process intended to assure the public of government transparency and accountability failed to provide timely and relevant public materials.

There are various compelling reasons why this application should never have been allowed to proceed, all detailed in submissions<sup>1</sup>. Obviously snow depths are critical and the lack will significantly curtail season and revenues.

Numerous people familiar with the area suggested to us that snow depths were doubtful. Others, with questions as to the adequacy, presumed that the proponents must have done due diligence. We will return to the subject of due diligence.

Puzzling that there is no mention of the adequacy, in the lengthy application or its later revised versions.

Perhaps the proponents, with their self-described enthusiasm, unbridled optimism, a couple of heli ski runs done and their "Powder Dreams" mantra, just assumed everything would be fine. Perhaps they misled themselves with their own mythmaking. As their latest puff piece in a Seattle news outlet says: **"everyone knows the Monashees have the deepest driest snow in North America"**. The proponents revised plan acknowledges that the area is in the Selkirk foothills eco-section. There is a difference, and it becomes apparent in various snowfall data.

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### WE LOOK AT THE SNOW DEPTH NUMBERS

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It is troubling that there seems to be a need for this section, and that it appears that the public has to provide it. Critical snow depth information is not discussed in the Proponents applications and from various discussions, FOI information and more, Government does not appear to have required it. More on this in our section on [Application Process Concerns](#).

The proponents indicate that “most areas intended for travel are passable simply by driving the snow cat over the snow when there is approx. 1.5 m.” We suggest that in many areas, particularly the many intended snow trails, over rough ground, over logging debris, also skiing over vegetation and regrowth, 1.5 m would be inadequate unless those trails and slopes are levelled, vegetation removed, disturbed and permanently lost. The Proponents revised application repeatedly states their intent to leave stumps at 1m in an attempt counter concerns as to public and motorized trail use.

While we maintain that more than 1.5 m would be needed to enable fill and coverage of trails and some other areas, data indicates that the 1.5 m number is not reached in this area during the supposed preparation month November, and occurs only occasionally in the season to early April. It will be argued by the Proponents that they found deeper snow depths. The multiple factors for this are detailed in the *Snow Characteristics section*.

Snow depth data is available for the past 16 years from the Grano Snow Station adjacent to the proposed tenure.

Contrary to the conventional wisdom of valley bottom dwellers, snow depth in interior mountains does not usually increase proportionately with elevation. Typical winter weather sees early to mid-season snow falls dropping similar depths at elevations sometimes below 1200 m to peak heights of 2300 m or more.

A following chart of snow depths highlights this point, with most interior ski operations having similar or same snow depths at top and bottom. Variation can occur in snow depths thanks to

aspect, avalanche, drift, and more, but the overall record at the PRL location indicates inadequate snow depth, and depths considerably lower than at multiple other operations.

#### OBSERVATIONS REGARDING FOLLOWING CHART on SNOW DEPTH COMPARISONS

- Several heli and cat ski operations were closed 2020/2021 due to Covid so depths not reported. PRL depths are substantially lower than those enjoyed by “the competition”. As of end of Feb 2021 amounting to only 40% depth vs competitors.<sup>ii</sup>
- Comparisons were also made with Big White where reporting is intermittent at their snow station elevation 1680 m vs Grano at 1859 m. Big White depths since 2015 compared to same day at Grano had most depths at 10-20cm of each other and variations averaged out.
- PRL’s lesser snow depths affect season and snow quality and therefore desirability, as a powder destination.
- PRL can expect to be affected sooner than the competition by warming trends and changing weather patterns. The concerns of nearby Big White should have concerned this proponent (that due diligence question again)
- The similar snow depths at various elevations normally continue through January then higher elevations begin to retain (and sometimes receive) more snow due to the multiple factors discussed in Snow Characteristics.

BIG WHITE CONCERNS. We quote from their Master Plan Application 2020.

- “Climate change has added increased uncertainty to the ski industry with regards to reliable snowline, snow quantity and quality”
- “These changes will create challenges for Big White’s existing winter and summer offerings”
- “Snowfall is expected to decrease” (in various climate change models).
- “It should be recognized that with the increasing temperatures.....the type and quality of snow will likely change. The ‘champagne’ powder Big White is known for will likely become less prominent and a heavier wetter snow will become commonplace”.

Big White is therefore looking to hugely expand various activities summer and winter in anticipation of less favorable conditions for ski operations.

While Big White recognizes the ongoing effects on their operation, there is a substantial difference in the snow conditions required for downhill skiing vs cat or heli skiing where the former can groom minimal depths or make snow.

The implications for PRL should be obvious to most, except perhaps the Proponents who appear to have allowed their optimism to override the realities.

Diminishing snowfall is already affecting ski operations in the Northern and Southern Hemispheres, shortening seasons, changing snow characteristics (less powder) and making rising snowlines.

TABLE 1 Mid to late January snow depth comparisons below.

**2021 mid to late january snow depth comparisons  
many facilities not open due to Covid**

date	location	heights	snow depth	
1/13	silverstar. village	1609 to 1915 m	top 1.5 m bottom. 1.4 m	
	weigle			closed
1/23	big white. village	1755 to 2319 m	up. 179 cm low. 179 cm	
1/23	sun peaks. village	1255 to 2152 m	up. 142 cm low. 141 cm	
1/23	kicking horse	1190 to 2505 m	up 174 cm low. 174 cm	
1/23	revelstoke mtn	512 to 2225	up. 198 cm low. 198 cm	
1/23	blanket glacier	1400 to 2500 m		chalet at 1850 m
1/20	chatter creek cat-heli near golden	1500 to 2900 m	lodge 203 cm	by mid season at 6500'. 3 m
1/17	great northern sno cat	4000 to 7400'	base 231 cm	
1/17	white grizzly cat ski meadow creek			mar 15 2020. base 274 cm closed this season
1/17	selkirk snowcat meadow creek		base 190 cm	at a frame lodge at 1900 m =6200'
1/23	k3 cat ski	1350 to 2249 m	base 230 cm	as per customer report on jan 5th
1/23	island lake lodge cat ski near fernie			no depths given at <a href="http://snow-forecast.com">snow-forecast.com</a> or website
1/23	panorama mtn resort purcells west of invermere	1150 to 2450 m	top. 112 cm bott. 69 cm	bottom not much higher than my house bottom snow base similar
1/23	rk heli at panorama			2021 closed
1/23	powder creek lodge heli			no depths at <a href="http://sf.com">sf.com</a> or website
1/23	cmh. valemont cmh. monashees			nil given
1/23	mt baldy	1663 to 2123 m	top. 1.4 m bott. 1.4 m	
1/23	pri proposal  check various min elevation in tenure	lodge 1938 m	at 6100' or 1859 m 91.9.cm or 36.2"	lodge 1938 m noren 2285 m cochrane 2322 m gable. 2195 m

TABLE Snow depths recorded at Grano Snow Station. It indicates scarcity of the 1.5 m snow depth Proponents think they need for trails. Our further comment follows the table.

GRANO SNOW STATION	SNOW DEPTHS				in cm																																												
	NOV	DEC	JAN	FEB	MAR	APR	MAY																																										
2020/2021	36.5	60.7	95.3	149.2																																													
2019/2020	48	66	119	148	158	159	127																																										
2018/2019	60	84	86	100	115	119	63																																										
2017/2018	85	85	110	150	193	213	124																																										
2016/2017	mostly missing																																																
2015/2016	46	90	115	143	172	148	60																																										
2014/2015	14	50	88	91	101	105	56																																										
2013/2014	47	77	99	112	126	137	115																																										
2912/2013	32	92	108	121	142	151	95																																										
2011/2012	24	50	74	104	147	158	117																																										
2010/2011	33	65	92	112	146	188	150																																										
2009/2010	37	66	91	96	118	123	105																																										
2008/2009	21	49	86	97	124	128	108																																										
2007/2008	33	63	99	119	140	153	116																																										
2006/2007	39	82	110	123	140	127	70																																										
2005/2006	40	58	110	136	163	166	105																																										
2004/2005	41	86	101	105	112	146	60																																										
20-03/2004	35	64	94	128	138	127	79																																										
Average	39.5	69.86471	98.66471	119.6588	139.6875	146.75	96.875																																										
# above 1.5 m	0 of 17	0 of 17	0 of 17	1 of 17	4 of 17	7 of 17	1 of 17																																										
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">GRANO SNOW STATION at 6100' or 1859 m grano random depths</th> <th style="width: 50%;">EQUIVALENTS</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">inches                  cm</td> <td></td> </tr> <tr> <td>nov 15 20    19.6"                  50</td> <td>40 cm = 15.7"</td> </tr> <tr> <td>nov 30        19.2"                  49</td> <td>50 cm = 19.6"</td> </tr> <tr> <td>dec 15        23.6"                  60</td> <td>60 cm = 23.6"</td> </tr> <tr> <td>jan 1          33.4"                  85</td> <td>70 cm = 27.5"</td> </tr> <tr> <td>jan 14 21    38"                    86.5</td> <td>80 cm = 31.4"</td> </tr> <tr> <td>jan 17        37.4"                  94.9</td> <td>90 cm = 35"</td> </tr> <tr> <td>jan 21        36.6"                  92.9</td> <td>100 cm = 39"</td> </tr> <tr> <td>jan 24        36.2"                  91.9</td> <td>110 cm = 43"</td> </tr> <tr> <td>feb 2          47.2"                  120</td> <td>120 cm = 47"</td> </tr> <tr> <td>feb 15        53.1"                  135</td> <td>130cm = 51"</td> </tr> <tr> <td>feb 24        58.6"                  149</td> <td>140 cm = 55"</td> </tr> <tr> <td>mar 4         57.8"                  147</td> <td>150 cm = 59"</td> </tr> <tr> <td>mar 15        55.5"                  141</td> <td>180 cm = 63"</td> </tr> <tr> <td>mar 31        57.8"                  147</td> <td>170 cm = 67"</td> </tr> <tr> <td></td> <td>180 cm = 71'</td> </tr> <tr> <td></td> <td>190 cm = 74.8"</td> </tr> <tr> <td></td> <td>200 cm = 78.7"</td> </tr> <tr> <td></td> <td>210 cm = 78.7"</td> </tr> <tr> <td></td> <td>220 cm = 86.6"</td> </tr> </tbody> </table>								GRANO SNOW STATION at 6100' or 1859 m grano random depths	EQUIVALENTS	inches                  cm		nov 15 20    19.6"                  50	40 cm = 15.7"	nov 30        19.2"                  49	50 cm = 19.6"	dec 15        23.6"                  60	60 cm = 23.6"	jan 1          33.4"                  85	70 cm = 27.5"	jan 14 21    38"                    86.5	80 cm = 31.4"	jan 17        37.4"                  94.9	90 cm = 35"	jan 21        36.6"                  92.9	100 cm = 39"	jan 24        36.2"                  91.9	110 cm = 43"	feb 2          47.2"                  120	120 cm = 47"	feb 15        53.1"                  135	130cm = 51"	feb 24        58.6"                  149	140 cm = 55"	mar 4         57.8"                  147	150 cm = 59"	mar 15        55.5"                  141	180 cm = 63"	mar 31        57.8"                  147	170 cm = 67"		180 cm = 71'		190 cm = 74.8"		200 cm = 78.7"		210 cm = 78.7"		220 cm = 86.6"
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In the above table, the incidence of snow exceeding 1.5 m is derived from monthly averages. The table shows that depth occurring by March in four out of seventeen years. Prior months were one in seventeen. Review of the daily data shows a higher incidence in some periods but not of significance. The Grano Data is all available online to anyone who cares to check our information.

It is notable that the earliest date in the period where 1.5 m occurred, was Jan 11<sup>th</sup> 2020. The Proponents reported their first visit to the proposed area was May 2020. Higher than usual snow depths occurred that season. That year January thru May depths were above average as follows: Jan 20.6%, Feb 23.7%, March 13.8%, April 8.38% and May 31.9% higher than the previous 17 year averages.

Comparisons with Baldy<sup>iii</sup>. A daily record kept, Jan 25<sup>th</sup> 2021 through March 30<sup>th</sup> (Baldy closed) indicated Grano depths lower than Baldy by 21% to 37% in the period.

The characteristics of snow for covering areas, and trails. And for suitable 'powder skiing' use, are discussed further under Snow Characteristics.

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### *SNOW CHARACTERISTICS*

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The Proponents have posited that once there is approx. 1.5 meters of snow '**settled**' (emphasis ours) on the ground, most areas for travel are passable simply by driving the snow cat over the snow. The tables supplied on snow depth which indicate the infrequency of reaching that depth, are not necessarily measuring 'settled' snow. The generally accepted measures that relate to "settlement" are usually reported as % Snow Density. (Snow Water Equivalent divided by depth of snow)

- New snow and uncompacted Powder range from 5% to 20%
- Settled Snow (self compacted after some days) to slightly compacted by machine, 20% to 30%.
- Highly Compacted by conditions or melting. This percentage normally climbs over the season due to variables including compaction and melting and from new snow. 30 % to 50%
- Other examples : 53-55% for snowboard and downhill runs and 58-62% for slalom
- The multitude of factors that influence changing characteristics of "landed" snow are too big and broad a subject to cover here.

March 16 2021 at Grano Station <sup>iv</sup>density at 38% after trending up from about 20% in November. Industry and commentators<sup>v</sup> suggest that 8% is optimum density for powder snow. At lower densities skis and boards can push down through the snow potentially impacting obstacles or vegetation.

Proponents made a new claim in PRL3 that snow pack is typically deep with annual snowfall of 550 cm to 750 cm. These numbers were extracted from a broad geographical area summary. The relevant information is actual snow depths.

#### Snow Depths. Weather and Variable Factors.

We will forego any detailed account of all the variables affecting snow depth and retention at the proposed site other than the following:

- Amount and frequency are variables highly influenced by weather direction and source/quantity of moisture content and temperatures.
- Deposition can be variable due to direction and snow shadow effects.
- Depositions arriving over foothills areas (generally warmer areas) are less likely to have desirable "powder" qualities and this effect increases during the season.
- During and after deposition, slope, aspect, elevation (later in season), increasing solar impact on slope and aspect, wind, during and after deposition, drifting (can occur with less than 15 km wind) slips and avalanche and capacity of areas to retain/hold snow, all contribute to variable snow depths.

The presence of snow deposits in 'recipient' areas is to be expected. PRL's discovery of same is to be expected and should not be used to extrapolate or assume depth adequacy. What can also be expected is that those recipient area deposits, represent snow loss nearby.

#### Qualities of Powder Snow

The density aspect was mentioned earlier. Typical early season deposition of sufficient depth to cover obstacles is critical and not always available at the PRL site. Powder snow resists mechanical compaction and is an elusive building material tending to flow/drift away. Grano historical Snow depths Nov thru January are almost entirely below 1 m making PRL's plan unachievable. Our earlier submission indicated that lack of snow depth was a prime factor in the failure of a previous heli ski tenure holder.

Afficionados and Industry often refer to 6" (15.24 cm) as a "Powder Day"<sup>vi</sup> How frequently does this happen? The closest data<sup>vii</sup> comes from nearby Big White which records less than 11% of days with 6" powder December through March. Big White is not dependent on regular powder, PRL would be. The frequency data source shows various other "further into the interior" sites with greater frequency.

#### Conclusion

Site is inadequate for intended purpose.

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## APPLICATION PROCESS CONCERNS

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A number of concerns in this area were included in our earlier submission and remain. [groupsubmissionsmerged.pdf \(boundaryalliance.org\)](#)

Three other major concerns remain.

The apparent failure to consider the disqualifying nature of inadequate snow depths, prior to the application being advanced.

Despite Government assurances<sup>viii</sup> “that Investigations, research and development of management plans are required prior to submission of a formal application” there is no indication that snow depths were considered at any time in the process.

While the issue was quietly raised in our initial submission, it was then mostly based on outside comment and data had not then been collected.

We raised the issue again in a phone conversation with Sharon Dailey on Jan 20<sup>th</sup> 2021. While that conversation was mostly about process, I asked the question: “**Who assesses the adequacy of the snow depths in the (PRL) area**” While Ms Dailey had been quick in earlier responses, my impression was that she was taken aback by the question, hesitated, and then said: **So, its going to be a combination of many kinds of habitat biologists, environmental, first nations, you’ve kind of got a whole pile of different specialists”**.

It sounded to me in that answer that Ms Dailey was winging it, nevertheless I assumed that this information would be obtained at that early stage, and we expected that it would show up in the FOI request lodged Feb 24 2021.

On belated receipt of the FOI enquiry July 12<sup>th</sup> and in conversation with various people who might be expected to be on the ‘whole pile’ list, it appears that no such enquiry was made. Absence of review in this area is either a profound fault in not requiring the information or perhaps a dereliction of duty. If anything at all was done in this area, we request the information. Any re-direction to FOI is unjustifiable given the claims of transparency in the process.

### Second Major Concern

In the early stages of the application, conversation with various Government staffers indicated that the “buzz” within Departments was that the PRL application was one expected to be approved, that Proponents had had misfortune on a previous (Powder Mountain) tenure application, that caribou had newly showed up at that previous tenure foiling the Proponent’s intent, and that they were good people. While Proponents made similar claims on social media they also indicated that Government was helping them find a new location, the ‘source’ of the internal buzz appears to have been Sharon Dailey as confirmed by one source. Such spread of information can be counted on to taint the approvals and review process for all the obvious reasons.

In my phone conversation with Ms Dailey Jan 20<sup>th</sup> 2021, she repeated part of the claim that caribou moved to the previous Powder Mountain tenure. This claim appears to be entirely based on the Proponents interpretation of a map showing some collared caribou on the Powder Mountain site that had not been there the previous year. The proponents made much of this situation on social media, indicated that they had voluntarily abandoned all rights (was there another option?) and indicated that Government was helping them locate a new site? If there is any truth to this, it seems borne out by the internal buzz.

The collared caribou were only part of the area herd, the collared presence did not represent proof of absence of other caribou and reports show much of that area as caribou range for many years.

The caribou “issue” was well known to the industry when the Proponents acquired that earlier tenure.

In other words, Proponents failed to do due diligence or hoped to “mitigate” their way to approval.

### Third Major Concern

The failure to include the Proponents well publicized (multimedia) intent to host or arrange a TV show featuring construction, and ongoing operations. This intent is well known to those handling the file however any discussion of the damaging consequence is being avoided “as it is not in the application”. We suggest that any proponents stated public intent need to be fully included in any approvals process and given more importance than the self-serving statements in an application.

Facing the expectation of reduced seasons, the TV show as revenue, plus pressure for summer activities can be expected despite denials on the latter.

The prospect of a TV crew comes with expectation of substantial additional heli and machine traffic, disturbance and the probability that crews will be chasing remnant, fugitive wildlife populations for “good footage.”

More on the issue in the *Economic Viability* and *Summary* Sections.

All of these concerns call for careful investigation.

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## *PRL's ECONOMIC VIABILITY AND MARKET RESEARCH*

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The PRL initial application indicated they had conducted market research and analysis.... and produced detailed financial and business projections which were available on request.

We requested them and the request was declined.

It is not apparent whether Government requested them.

Whatever these exercises produced, they were based on an anticipated season of early December through early April, 120 days in all.

We suggest that past snowfall averages might enable half of that season and the progressive expected warming trends noted by Big White can be expected to further reduce the quantity and quality of snowfall.

With the probable shorter season and substantially reduced revenue, the project is not financially viable.

We note that the current owners<sup>ix</sup> of BC's oldest cat ski venue describe cat-skiing as a “low margin industry with huge upfront costs”.

### Does Government have a duty to “prevent” unviable projects?

We suggest the answer is clearly yes when public assets are at stake, where environmental considerations should have already put this application down, and various damage has not yet

been done to ecosystems and wildlife. Add in the immense amount of Government and public effort and time that should not have been needed had this application been dismissed in the early stages.

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*FREEDOM of INFORMATION REQUEST: FARCE SPREAD on INSULT*

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A concerned colleague, Margaret Steele, filed an FOI Request Feb 24<sup>th</sup> 2021. Although a Deputy Minister and other Ministry officials would claim that the application process is transparent, it certainly is not and in this case was compounded by an inadequate and short public response period as noted in earlier submissions.

The FOI Request was for Government Agency and First Nations responses to the PRL application.

After this FOI response we have further confirmation that an initiative intended to protect the public has become a mechanism for protecting government from scrutiny. While government claims FOI and multiple other agencies are independent, Government's control of appointing leadership, providing direction and controlling budgets makes the independence claim ludicrous. The repeated interference and more by Government are a matter of public record. The result re FOI is a process apparently now designed (or deliberately used) to delay and obfuscate the public interest and the public right to know.

FOI REQUEST TIMELINE:

Feb 24 2021 initial request, response date advised by April 12 2021

April 12 2021 FOI notified that response date was extended to May 25 2021

May 20 2021 FOI requested consent to respond by July 7 2021, colleague declined consent.

May 27 2021 FOI advised OIPC had approved extension to July 7 2021 regardless.

June 11 2021 colleague asked OIPC to review the extension after which OIPC indicated the review process would take at least 2-3 months !!

July 12 2021 colleague received some documents but FOI indicated some documents had been found late and were "being processed".

Aug 5 2021 FOI advise the documents "being processed" were irrelevant, case closed and that the FOI response would be published on their website in 10 days, but might take longer.

Sept 22 2021 OIPC reply to June 11 th review request. Reply indicates basically that OIPIC is able to authorize extensions, did so and tough luck. Just a rubber stamp for unwarranted and unexplained delays. The farce spread on insult.

Oct 13 2021 they are still unpublished.

It is expected to show up eventually as FOI File: FNR-2021-10918

The time delay alone for a relatively simple file all assembled by one employee is ridiculous. The content as supplied builds on the ridiculous by providing a file too large for most to send or access and this issue is compounded by FOI failure to publish on their website so far.

## Why is the FOI response so large?

A 121 page FOI response was received. Too large a file for most interested parties to send or receive the file which was expected to be published on the FOI website, making it at least available to some, still unpublished.

Of the 121 pages, 63 or over 50% are not responsive to the request and therefore appear to be 'padding; intended perhaps to make file transmission difficult or to overwhelm with information. The unnecessary pages consist of 29 pages of our own backgrounder and submission on the PRL Application, much of those documents a repeat of information. While we have no real objection to the inclusion of these in the FOI Report, we question the motive for inclusion. Two website links would have sufficed. Another 34 pages were irrelevant maps with no content, repeated duplications and 13 redacted communications with Westbank First Nation The latter could have been a one-page summary. This brings up the further question as to why First Nations discussions with Government are not made public and accessible. All in all a waste of time that failed to answer critical questions.

Who is or intends to review the whole FOI mission?

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## SUMMARY

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- Inadequate Snow levels should have seen this proposal terminated before the full application stage.
- Proponents indicate that area has been subject to large human impact...and habitat has been degraded down.... Sadly true but no justification for the additional environmental impact and disturbance this project would add. See our recommendations.
- The reduction in the proposed tenure area, where areas have been dropped largely because they are not useful to the Proponents, does not reduce the various impacts of the Plan.
- The “enhanced mitigation” measures and other tinkering promised, would do nothing of significance to address the deficiencies and damaging nature of the plan.
- Economic benefits claimed fail to address the significant environmental and wildlife costs created by a highly mechanized operation, catering principally to overseas<sup>x</sup> clients. Activities well recognized as significant GHG producers, part of the worldwide contribution to warming and (ironically) changing snow patterns.
- Critical revenue recalculations needed in view of significant reduction in operating days scenarios.
- The failures to do adequate due diligence have followed the Proponents to the point that it is evident that they have been blinded by their own hype.

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## RECOMMENDATIONS

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- Turn the application down now
- Apply mitigation to deal with the existing degraded conditions that have occurred in the areas in and around the proposed tenure, despite the protections that were to have followed from establishment of the Motor Vehicle Closed Area and the Grizzly Wildlife habitat, GAR Order.
- Initiate an enquiry into the Application Process Concerns.
- FOI review, even more essential as Government has made transparency even more remote, by introducing new fees.
- Initiate a review of unsatisfactory advertising and timing of these applications and the process itself which sees applications handled (and adjudicated) by departments that are also engaged in promoting such developments.
- Provide an opportunity for public review of the “spreadsheet” process used to organize information on applications like this and how recommendations are then derived from that to the recommended disposition stage. We request that a couple of us be invited for such a review.
- Some broader concerns have been directed to the Minister.

al grant. Writer/researcher, Boundary Environmental Alliance

with contributions by Margaret Steele.

## ENDNOTES

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<sup>i</sup> [groupsubmissionsmerged.pdf \(boundaryalliance.org\)](#)

<sup>ii</sup> Snow depth comparisons were made with 9 interior operations, including 5 heli/cat operations. These comparisons informed our observation that early season snow depths are similar through a large elevation range and that Grano has lower depths than most, At the end of February 2021, 47-8% of the 9 average and only 40% compared to the 5 “competitors”. Several other heli/cat operations were closed in the period, limiting comparisons.

<sup>iii</sup> Comparison with Baldy was a daily record comparing Grano, Baldy and the writers location at 1130 m. Temperature records were also logged.

<sup>iv</sup> NOAA Grano Snow Station Data, tables and snow density info and more at: [Snow Station Information - GRANO CREEK \(noaa.gov\)](#)

<sup>v</sup> UBC snow met consequences/newly fallen snow density

<sup>vi</sup> [www.bestsnow.net](#) a source also quoted by Big White in their Master Plan.

<sup>vii</sup> [www.bestsnow.net](#)

<sup>viii</sup> Email from Assistant Deputy Minister Paul Rasmussen Dec 10 2020 to Elizabeth Steele.

<sup>ix</sup> Megan Ozak in BC Business Nov 2020. Ozak’s bought the oldest operation in BC , Selkirk Snowcat Skiing, 9 years ago.

<sup>x</sup> Ozaks suggested 65% are foreign visitors.