CMH File: CMH CA/VA Heli-ski

MFLNRO file: 7404014

# Proposal to amend tenure boundaries – CMH CA/VA

## August 6, 2015


**Summary**

This is a request to amend the existing area-based License of Occupation for CMH CA/VA by adding new ski terrain in the upper Raush drainage and in "No Name" Creek (a tributary to the North Thompson).


**Proposal**

We ask that the area-based tenure for CMH Cariboos/Valemount (L/O #705957) be amended to include new ski terrain to the north of the existing tenure boundary and along the south edge of the existing tenure boundary (as shown on the attached maps at 1:75,000 and 1:100,000).

Over time, there have been a number of changes in this area that are the basis for this request:

- Weather and snow-fall patterns continue to change, which is increasing the value of higher-elevation terrain;
- While the Valemount-Blue River SRMP did result in significantly fewer conflicts with snowmobiles and other users, we did lose some ski terrain in that process;
- The approval of a new ski-tour hut in the McAndrew area has created additional risk for us in the context of overlaps with unmanaged ski-touring and unmanaged sleds in that area (the experiential and safety issues were well-documented in our many submissions to government); and
- The proposal for a new alpine ski area out of Valemount creates a potential risk for loss of ski terrain on the north side of our tenure. The timing and likelihood of this project is uncertain.

As a result, we submit this request to begin to proactively deal with these challenges.

If approved, this proposal would increase the size of the tenure from its current 1402.08 sq. km to 1689.35 sq. km. This would mean an increase of 287.27 sq. km (or a 20.5% increase) and the addition of 33 new ski runs.

The run names shown on the attached maps are proposed and are offered for reference only.

We understand that we will have to amend our management plan and management plan maps if this proposal is approved. If that occurs, we would amend our Azure/Raush and North Thompson ski zones to include the new terrain.

**Implications of Proposal**

If approved, the addition of these two areas will add new ski terrain on the northern and southern edges of the tenure. This terrain will allow us to spend more time with groups in the northern and southern parts of the tenure, particularly with private groups from our Valemount lodge. It also gives us additional terrain to use to

ensure that we do not cause displacement of mountain caribou (or other key wildlife species such as mountain goat; see below) and/or that we do not interact with ski-tourers or sledders.

If added to the tenure, the terrain will not change our levels of use (skier-days or skier-runs) but may result in a slight shift in the distribution of that use our across the landscape. Until we have access to the terrain for a season or two and get a sense of how it fits with the existing terrain, it is difficult to know how it will be used. For now, we see no need to make changes to the targets for use by ski zone.

**Wildlife Management**

Most importantly, these areas have been chosen so as not to overlap with mapped caribou habitat (i.e. the Section 16 map reserve against alienation of caribou habitat). This is shown on the attached map for No Name Creek (there appears to be no mapped caribou habitat in the vicinity of the upper Raush). UWR u-3-004 lies to the east of (but does not overlap with) No Name Creek.

Beyond that, there are some small pockets of (winter) mountain goat habitat in these areas (also shown on attached maps). Our objective in operating in these areas will be to ensure continued occupancy of the mountain goat winter ranges and ensure no displacement caused by aircraft. In the case of No Name Creek, the mapped habitat overlaps with two of our proposed runs (No Name 11 and No Name 7) and is adjacent to No Name 3. In the Raush, one proposed run (Daydream) lies directly adjacent to mapped habitat. In all of these situations, we will follow the Tourism Wildlife Guidelines by:

- If this proposal is approved, flying the areas early in the first operating winter (with MOE staff, if they wish to join us) to identify/confirm areas of occupied mountain goat habitat
- No intentional flight-seeing of goats
- Staying at distances sufficient to prevent changes to the behaviour of the animals (more than 1500 m line-of-sight is the default)
- Avoiding occupied habitats where animals have been seen in the current season and/or animals consistently occupy the area and the area is mapped as occupied
- Minimizing use in areas of high probability or potential, or where potential is mapped with no verification of use (this may apply to areas adjacent to the mapped habitats)
- On an annual basis, continuing to submit detailed wildlife observation/decision records to the Ministry (as we have done for many years).

It is expected that wolverines will also use these areas from time to time, as will Grizzly and Black Bears (spring), American Marten and Fisher, wolves, moose (in the lower elevations in winter) and a variety of small mammals and birds at home in old-growth and high-elevation forests.

Regardless of the presence or absence of caribou, goat, grizzly or wolverine habitat, we will continue to use our existing protocols and procedures (in our management plan, and in full compliance with the province's tourism-wildlife guidelines and the HCC-Province of BC MOU on caribou recovery) to ensure that we do not cause any displacement of any key wildlife species.

**Public Recreation**

We are not aware of any winter use of these areas by the recreating public. They are remote and rugged valleys with poor/no road access.

**LRMP/SRMP "Zoning"**

The Raush area was discussed in the Robson Valley LRMP and is designated a "Special Management Zone." As a result of that LRMP process, a new protected area was created well downstream of the proposed expansion area. We suggest that nothing we are proposing here (particularly in light of our focus on wildlife management) will affect any of the values that were the basis for this designation.

The lower portions of No Name Creek are designated as "not actively managed for snowmobiling" in the Valemount-Blue River SRMP while the upper portions were unzoned. It's a rugged un-roaded valley that does not appear to be used for public sledding.

**Adventure Tourism**

We are not aware of any other AT tenures in this area that would be operating during the winter months.

The Raush area lies directly adjacent to our existing CA/VA and McBride tenures.

The No Name Creek area lies to the east and south of our existing CA/VA tenure, and to the north and west of the tenure held by Mike Wiegele Helicopter Skiing. We have specifically mapped the boundary of the proposed area so that there is (and should be) **no overlap** with the MWHS tenure.

We are not aware if the proposed expansion areas overlap with any trapping or guide-outfitter tenures, although we believe not.

**Forest Management or Mineral Exploration/Development**

The proposed areas are, for the most part, above the operability line so we do not anticipate any issues. We are not aware if the Raush is part of any forest tenures but it was not at the time of the LRMP.

In the North Thompson, Tolco has been the active forest company there for many years but there has been no development in No Name Creek. Regardless, we maintain strong relationships with local forest companies and resolve any overlap issues through referrals and direct communications.

We regularly receive referrals from the Ministry of Mines for mineral exploration and development, and hope that this will continue. There are no known operating mines in the subject areas.

**First Nations**

The proposed amendment areas lie within the traditional territories of the Secwepemc (Simpcw) and Dakelh (Lheidli T'enneh) First Nations.

While our skiing activities do not normally have any impact on archeological or cultural/spiritual sites or values, we would be pleased to learn more about specific sites in these areas that may be of concern.