Adventure Tourism Management Plan

License of Occupation Application

She Shreds Mountain Adventures



September 14, 2021

Tracking # 100355546

Juli An Chapty

Company authorized signatory

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Executive Summary

She Shreds Mountain Adventures (SSMA) is a professional snowmobile clinician, avalanche course and occupational training operator based out of British Columbia. SSMA has been working with several tenure operators throughout British Columbia for the past 10 years, with full bases in the Nelson/Castlegar (Krestova) and Pemberton areas. Primary operations are staged out of Pemberton in conjunction with existing operators under sub-tenure and sub-contractor agreements and include women-focused single day snowmobile clinics, avalanche courses, and guided adventures. This programming is delivered in the Nelson & Castlegar area under a section 16 permit as authorized from Recreation Sites and Trails BC (RSTBC), and the company is now seeking to secure their own tenure to ride in the following West Kootenay areas: Ladybird, Norns, Six Mile, Meteor Mines, Redfish, Giveout, Krao, and Meadow. Securing a tenure with several areas (small Ha) is critical to be able to provide a safe and enjoyable experience for clients of varying abilities, and to accommodate changes in weather, hazards, avalanche danger and snow conditions.

SSMA is requesting a License of Occupation, pursuant to the Adventure Tourism (AT) Policy, to operate snowmobile clinics, avalanche courses and occupational training within Crown Land in the above stated eight (8) zones within the West Kootenays. The proposed tenure area covers 1890 Ha over eight main operating zones, using 160 km of forestry roads to gain access. The following Management Plan provides an overview of the areas of use and activities, environmental and cultural values, details on overlap with existing uses, and identifies key areas of concern.

Key highlights

- SSMA has been in operation for 10 years across British Columbia and Quebec, specializing in teaching women and men safe snowmobile operation and technique. SSMA offers educational clinics for participants to develop skills in a safe environment including snowmobile riding technique, outdoor survival, safe backcountry travel, backcountry etiquette and avalanche education (Avalanche Skills Training 1 (AST1) and basic companion rescue). SSMA currently operates in the Nelson/Castlegar, Pemberton, Golden, Revelstoke, and Valemount areas and is looking to secure tenure in the West Kootenays. SSMA brings tourism, employs local guides, and helps to impart backcountry etiquette on clients while providing a safe and enjoyable educational experience.
- SSMA has been operating in the Pemberton area for 8 years under a sub-tenure agreement to Totally Awesome Adventures & Broken Boundary Adventures and has become a subcontractor of Ride Whistler in the past 2 years. SSMA has been operating under a section 16 permit as authorized from RSTBC in the West Kootenay area. In all other locations, SSMA owner Julie-Ann Chapman subcontracts to an already existing tenure holder to operate under their umbrella. During this time, SSMA has never experienced any issues resulting in an existing tenure holder requiring any modification to their operations. SSMA has demonstrated continued flexibility to alter training and riding experience as required to accommodate existing tenure holders and follow provincial guidelines and to meet the needs of its niche clientele within the varied landscape of the tenure.

- SSMA has eight (8) primary riding zones identified in this application: Ladybird, Norns, Six Mile,
 Meteor Mines, Redfish, Giveout, Krao, and Meadow. These areas are established snowmobile
 areas and will provide appropriate safe riding terrain for SSMA clients. Use of each area will vary
 based in part on terrain, snow conditions, weather, accessibility, and client requirements.
 Seasonal expectation of use is from December to April.
- For the purposes of this application, a high-level assessment of mapped ungulate winter range, Wildlife Habitat Areas, and known occurrences available from the conservation data centre through iMap, and the Habitat Wizard were conducted. These layers were compared to the tenure application and areas of overlap, and no major conflicts with wildlife values were identified. Tenure boundaries were chosen to avoid any potential wildlife conflicts.

Table of Commitments

Table 1: Table of Commitments

Commitment detail	Applicable Zone	Justification
Comply with the Wildlife Act and Federal	All	Standard procedure / regulations
Fisheries Act at all times during operation.		
Continue to do pre-trip snowmobile	All	Standard procedure
inspections.		
Continue to offer environmental / wildlife	All	Standard procedure
briefing to clients.		
If wildlife are encountered along access roads,	All	Standard procedure / regulations
guides and clients will stop the machines and		
allow the animals to move off the access road.		
Machines will be paused until the animals have		
moved far enough away that they will not be		
disturbed by the passage of snowmobiles.		
If wildlife are encountered in tenure	All	Standard procedure / regulations
polygons (likely to be grizzly bear, wolverine, or		
southern mountain caribou), guides and clients		
will immediately leave the area and record /		
report the coordinates of any sightings.		
Minimize disturbance by not harassing, feeding,	All	Standard procedure / regulations
or handling any wildlife if encountered. If		
wildlife are encountered anywhere within the		
tenure area, guides and clients will shut off the		
engines and yield to the wildlife.		
Add First Nations cultural / stewardship	All	If requested / as required
knowledge into programming.		

General Overview of Business

SSMA has been in operation for 10 years across British Columbia and Quebec, specializing in teaching women and men safe snowmobile operation and technique. SSMA offers educational clinics for participants to develop skills in a safe environment including snowmobile technique, outdoor survival, safe backcountry travel, and avalanche education (Avalanche Skills Training 1 (AST1)), basic companion rescue and occupational training. SSMA currently operates in the Nelson/Castlegar, Pemberton, Golden, Revelstoke and Valemount areas and is looking to secure tenure in the West Kootenays. SSMA brings tourism, employs local guides, and helps to impart backcountry etiquette on clients while providing a safe and enjoyable educational experience.

The snowmobile clinics are designed to:

- Practice and test riders' safety awareness in the backcountry (read avalanche terrain, practice rescue scenarios and techniques, and safe route planning).
- Teach avalanche safety and backcountry survival tactics.
- Evaluate rider abilities.
- Refine current skills.
- Advance the rider to their own "next level".
- Create a comfortable and fun environment for riders to progress in the sport.
- Allow riders to boost their confidence level on a snowmobile.
- Provide a fun adventure while documenting the experience with photos and video.

Key Areas of Concern

1. AUTHORIZATIONS, PERMITS OR APPROVALS

SSMA seeks approval of this tenure application to operate safely and respectfully within the requested areas. Overlap with Selkirk Snowcats occurs in the Meadow area and SSMA has secured a signed Joint Use Agreement (JUA) (*Appendix A*). Overlaps occur in the Giveout area with existing summer tenure holders. SSMA has discussed the intent of this application with each company and no conflicts have been noted. A full list of overlapping tenures can be reviewed in section 3.7, and detailed correspondence is included in *Appendix B*.

2. FIRST NATIONS

Communications with the Ktunaxa First Nation & Sinixt First Nation occurred on April 5 2021 via email & telephone. SSMA owner Julie-Ann Chapman spoke with Marilyn James from the Sinixt Nation who referred her to the appropriate person to email (k.Linda). Julie-Ann has emailed both First Nations with an informational video and intent of contact. Conversations have begun with the Sinixt (included in *Appendix C*), however no response was received from the Ktunaxa.

3. ENVIRONMENTAL

No major wildlife concerns were identified within the requested areas. SSMA is committed to environmental responsibility and will conduct operations in a way that minimizes effects on wildlife

values and habitat. SSMA will adhere to the Wildlife Act, Federal Fisheries Act, and any other applicable government regulations and guidelines at all times during operations.

Tenure areas fall within 3 broad coverage Grizzly Bear Population units – Valhalla (High conservation concern [Ladybird, Norns]), Selkirks South (High conservation concern [Giveout Creek]), and Central Selkirks (Moderate conservation concern [Six Mile, Meteor Mines, Redfish, Krao Cutblocks]). Grizzly Bear Management Priorities are mapped as polygons, and all tenure polygons except Meadow, Norns and Ladybird are contained within these polygons.

The tenure polygons overlap with known, or historic ranges of 2 sub-populations of southern mountain caribou (*Rangifer tarandus*). Giveout Creek falls within the South Selkirks sub-population, which is currently listed as 'extirpated', with the last animals of this sub-population being moved to the Columbia North herd in 2018. The Meadow Creek tenure polygon overlaps with the Central Selkirks sub-population, which is estimated to be 26 animals (2020 estimate). There is potential for interaction with southern mountain caribou in this polygon, and seasonal, and temporal closures to protect this species must be followed to mitigate effects on this imperiled species. In addition to these caribou ranges, there is mapped critical habitat identified near the boundaries of Giveout Creek. No overlap of tenure polygons with this critical habitat is predicted.

All areas overlap with whitebark pine (WBP) critical habitat. No alterations to the landscape which would disturb WBP are anticipated for SSMA activities. Clients will be made aware of Leave no Trace principles and the presence of WBP.

Section 1: Areas of Use and Activities

1.1 Location Description and Mapping

1.1.1 Geographic Location

SSMA has eight (8) primary riding zones identified in this application (Figures 1-5). These areas are established snowmobile areas and will provide appropriate riding terrain for SSMA clients. Use of each area will vary based in part on terrain, snow conditions, weather, accessibility, and client requirements. Anticipated frequency of use for each riding area has been outlined in Section 1.2.2, Table 5.

Table 2: Tenure area size and access road length.

Tenure Area	Size (Ha)	Access Road	Length of Access Road (km)
Giveout	543	Giveout Creek FSR	19
Krao	92	Cody Cedar FSR	21
Meadow	247	Meadow Mountain FSR	22
Red Fish	173	Redfish Creek FSR	14
Ladybird	499	Ladybird Creek FSR	31
Norns	213	Goose Creek FSR	18
Six Mile	49	Duhamel Creek	28
Meteor Mines	31	Lemon Creek Rd	6

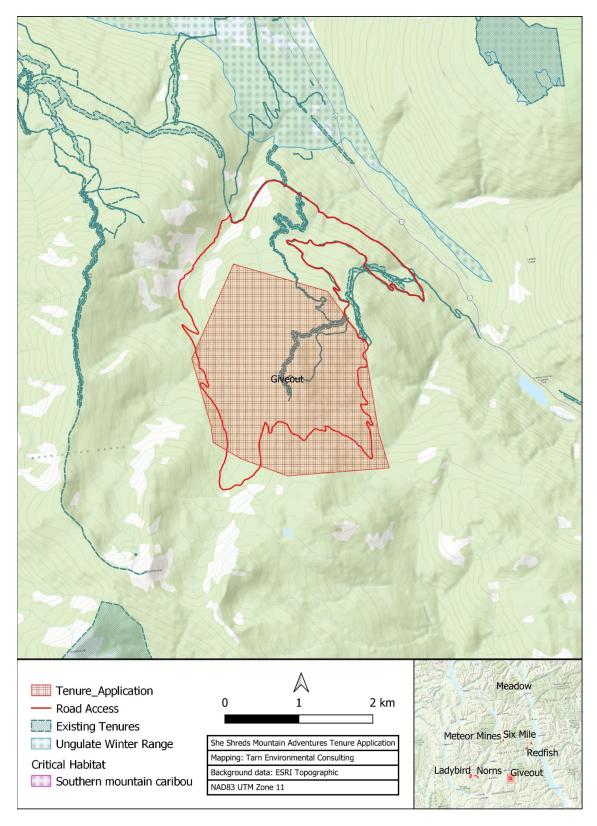


Figure 1: She Shreds Mountain Adventures tenure application area, Giveout, with ungulate winter ranges identified. Overlap with Nelson Sno-Goers Snowmobile Club and summer recreation tenure holders occurs in this area.

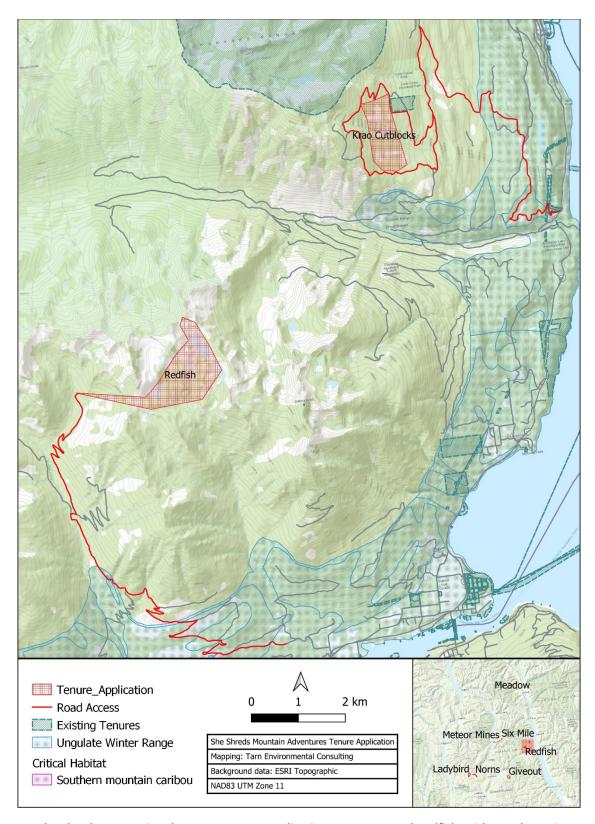


Figure 2: She Shreds Mountain Adventures tenure application areas Krao and Redfish, with ungulate winter ranges identified. Road access to Krao avoids overlap with the identified Section 16 reserve (under the Land Act) area by following the perimeter.

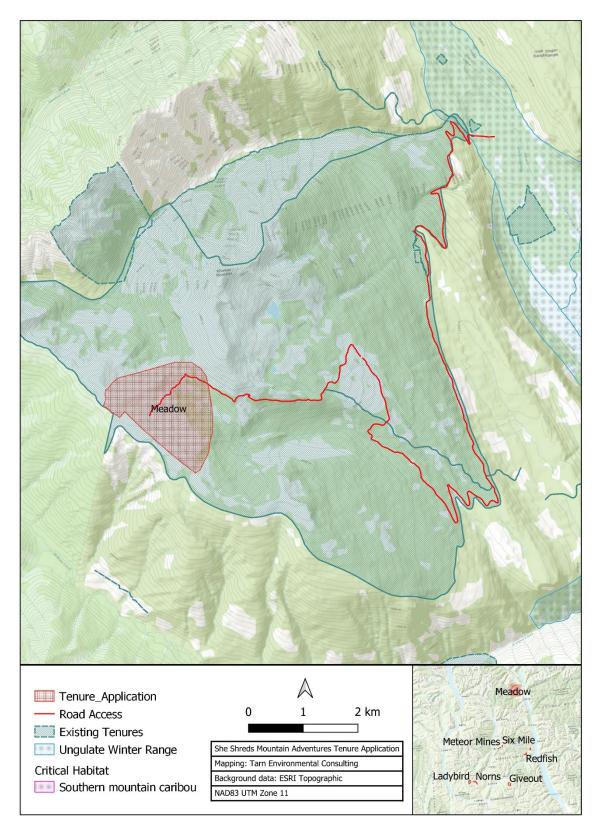


Figure 3: She Shreds Mountain Adventures tenure application area, Meadow, and ungulate winter ranges identified. Overlap with Nelson Sno-Goers Snowmobile Club and Selkirk Snowcats tenure occurs in this area.

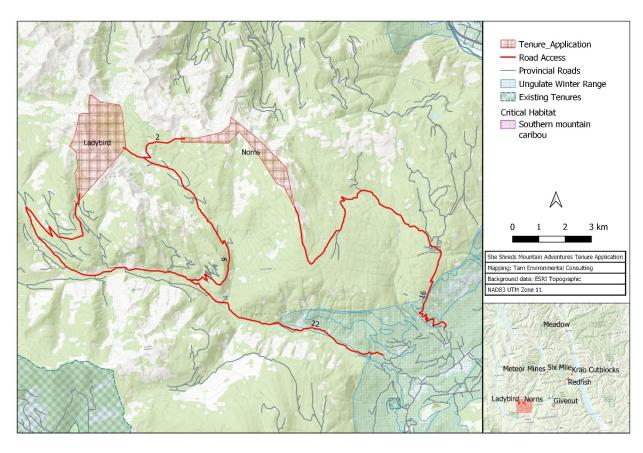


Figure 4: She Shreds Mountain Adventures tenure application areas, Ladybird and Norns, with ungulate winter ranges identified. Overlap occurs with the Castlegar Snowmobile Club in these two areas.

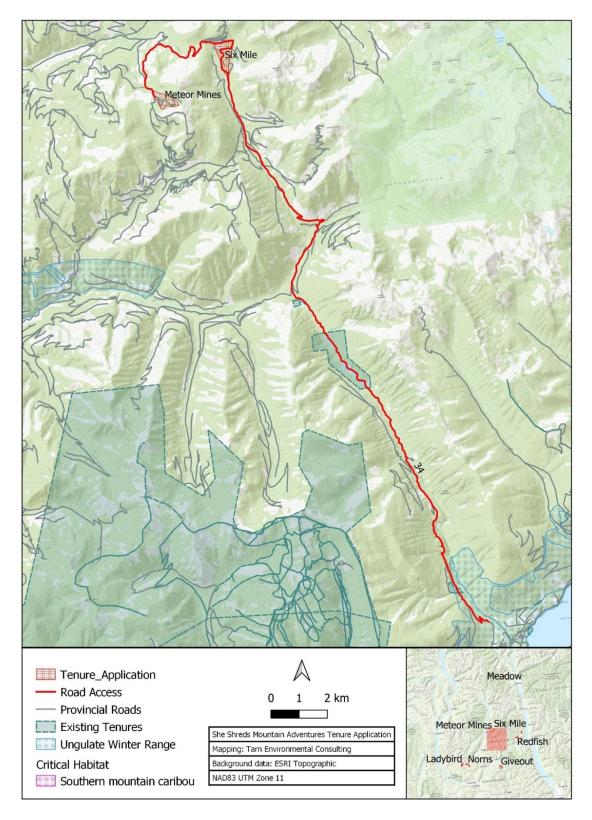


Figure 5: She Shreds Mountain Adventures tenure application areas, Six Mile and Meteor Mines, with ungulate winter ranges identified. Overlap with the Nelson Sno-Goers Snowmobile Club occurs in the Six Mile tenure area.

1.1.2 Base Operation

The SSMA base is located in Krestova BC. The base is a private residence where clients can meet each other and review pertinent information prior to heading into the backcountry. Due to the COVID-19 pandemic, meetings are all conducted on Zoom until further notice.

1.1.3 Access

Each of the eight main operating zones are accessed using the safest route to alpine snowmobile areas. The following list includes each area and its applicable access road:

- Krao Cutblocks is accessed via Branch Roads off Hwy 31
- Redfish is accessed via Redfish Creek FSR
- Giveout Creek is accessed via Giveout Creek FSR
- Norns is accessed via Goose Creek FSR, Norns Main FSR, and Norns West FSR
- Ladybird is accessed via Ladybird Creek FSR
- Meteor Mines is accessed via Six Mile Road
- Six Mile is accessed via Six Mile Road
- Meadow Creek is accessed via Meadow Mountain FSR

All forest service roads are accessible by vehicle, and snowmobiles will be transported by truck until snowline or a safe parking area is reached.

SSMA does not use helicopters for their regular operations therefore this has been omitted from the access plan.

Table 3: Existing and Proposed roads/trails used for access

Roadway/Propose	Existing or	Existing Road	Road Permittee	mittee Traffic Volume		Mitigation of
d Connection	Proposed	Classification	Information and Road Use Agreements	Constructio n Phase	Operations Phase	Traffic Effects
Branch Roads off Hwy 31	Existing	FSR	N/A		Low	Small groups
Redfish Creek	Existing	FSR	N/A		Low	Small groups
Giveout Creek	Existing	FSR	N/A		Low	Small groups
Goose Creek FSR	Existing	FSR	N/A		Low	Small groups
Norns Main	Existing	FSR	N/A		Low	Small groups
Norns West	Existing	FSR	N/A		Low	Small groups
Ladybird East	Existing	FSR	N/A		Low	Small groups
Ladybird West	Existing	FSR	N/A		Low	Small groups
Six Mile Road	Existing	FSR	N/A		Low	Small groups
Meadow Mountain	Existing	FSR	N/A		Low	Small groups

1.1.4 Staff

Julie-Ann Chapman is the owner and lead coach for all operations and has 12 years experience snowmobiling in the Nelson & Castlegar area. She has worked with many tenure operators in BC to provide clinics in different locations for the past 10 years. She has the following current certifications:

- Wilderness First Aid w/ CPR (80 hour)
- Instructor Snowmobile Safe Operators Course
- Avalanche Operations level 1 (completing level 2 March 2022)
- Advanced Search & Rescue

When group size exceeds 5 clients, additional tail guides are hired and all must have a minimum of AST1, 15hr first aid certification, and several years of experience in snowmobiling/coaching.

Table 4: Staff information

Staff Category	# of Employees	Experience and/or Certification
Lead Guide	2 Lead Guides	 Wilderness First Aid w/
Julie-Ann Chapman (owner)		CPR (80 hour)
		 Instructor Snowmobile
		Safe Operators Course
		 Avalanche Operations
		level 1 (working towards
		level 2)
		Advanced Search &
		Rescue
Lead Guide		Wilderness First Aid w/
Janice Mcwilliam		CPR (80 hour)
		 Avalanche Operations
		level 1 (working towards
		level 2)
		Advanced Search &
		Rescue
Tail Guide	4 Tail Guides	 Avalanche Operations
Stephanie Sweezey		level 1
		 Standard First Aid & CPR
Tail Guide		 Avalanche Skills Training 2
Aliz Kovac		(AST2)
		 Standard First Aid & CPR
Tail Guide		 Avalanche Skills Training 2
Tina Currie		(AST2)
		 Standard First Aid & CPR
Tail Guide		 Avalanche Skills Training 1
Hayley Auld		(AST1)
		 Standard First Aid & CPR

The Operator will ensure that pre-season training for guides includes operational awareness of the Wildlife Guidelines, the approved Management Plan and any applicable Wildlife Mitigation Strategy, and commitments/conditions of the *Land Act* licence, as appropriate.

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1.2 Extensive Use Activities

1.2.1 Description of Experience Being Offered

SSMA specializes in women-focused day and multi-day snowmobile clinics, avalanche courses and occupational training in the Nelson & Castlegar area (refer to section 1.1.1 for maps)). Although the company specializes in women-only clinics, a small number of private bookings and clinics are requested by male clients during the winter season. SSMA also does occupational training for groups such as Search & Rescue. All services are available to book at each tenure location. The seasonal expectation of use is from early December to end April, depending on seasonal snow conditions.

A typical day runs as follows:

- Meet group at operational base (Krestova BC) to discuss avalanche danger, weather, mapping lesson (terrain assessment on Google Earth), group dynamics and safe travel habits, trail safety, and review the proper gear needed (avalanche, rescue, and cold weather survival gear). Due to the COVID-19 pandemic, meetings are all conducted on Zoom until further notice.
 - o Complete a route plan as a group based on weather and avalanche danger.
- Complete safety protocol checklist and pre-trip avalanche operations plan.
- Go to the unloading location and conduct safety and environmental checks on all snowmobiles (e.g. no mechanical issues, no fuel or fluid leaks).
- Head into the backcountry, identifying all avalanche terrain off the cat track and discuss areas identified in the morning on Google Earth.
- Practice multiple companion rescue scenarios prior to entering potential avalanche terrain to familiarize the group with proper use of safety equipment and identify roles and responsibilities during an avalanche incident.
- Skills progression workshops begin on snowmobiles in terrain identified as safe.
- Throughout the day the lead guide points out avalanche terrain and how to proceed through the backcountry using the safest routes possible.
- Throughout the day the lead guide conducts snow stability tests. Weather/snow data is collected for a database and to assist with safe decision making in the backcountry.
- Clients return to their trucks at the end of the day and the remainder of the safety protocol report (post-trip details) is completed using recorded observations.

1.2.2 Activities and Level of Use

				Table 5: Exter	nsive Use Areas			
Activity Report							Client Day	S
Extensive Area Map Reference (i.e. Zone)	Activity /Activities	Specific References on Map	Frequency of Use	Period of use	Existing or Proposed Use	Current Year	Projected 5 Year Estimation of Client Days	
Giveout		Labelled Giveout	Approx. 15 Days / Season		Existing SSMA Activities. Use began 2017.	15	17	This application is for a 5-year term and expansion over this time is unknown. If
Krao		Labelled Krao Cutblocks	Approx. 5 Days / Season		New SSMA activities.	5	6	expansion occurs, it would likely be 15 - 20% (as shown in the Projected 5 year
Meadow	Snowmobil e Clinics (all SSMA	Labelled Meadow	Approx. 5 Days / Season	December – April,	Existing SSMA Activities. Use began 2017.	5	6	Estimation of Client Days column), would be snow dependent, and a request for
Red Fish	activities offered in each zone)	Labelled Red Fish	Approx. 6 Days / Season	weather dependent	Existing SSMA Activities. Use began 2017.	6	7	additional client days would be submitted as required.
Ladybird		Labelled Ladybird	Approx. 3 Days / Season		Existing SSMA Activities. Use began 2017.	3	4	
Norns		Labelled Norns	Approx. 11 Days / Season		Existing SSMA Activities. Use began 2017.	11	13	

Six Mile	Labelled Six Mile	Approx. 3 Days / Season	Existing SSMA Activities. Use began 2017.	3	4	
Meteor Mines	Labelled Meteor Mines	Approx. 2 Days / Season	Existing SSMA Activities. Use began 2017.	2	3	

1.2.3 Proposed Works

SSMA operations will have no infrastructure requirements on Extensive Use Sites. All required trip items will be packed in and out. This means that:

- There will be no restriction to public access in any terrain under this application.
- There will be no construction, ditching, grading, tunneling, or similar activities.
- There will be no water or sewage requirements.
- There will be no requirements for utilities (communication, transmission lines, energy distribution lines or similar).
- There will be no temporary shelters or tents built.
- The use of snowmobile cabins will not be allowed other than for emergency purposes.

1.3 Intensive Use Sites

This application does not include any Intensive Use Sites.

Section 2: Environmental and Cultural Values

SSMA continuously strives to teach clients the importance of environmental protection and advocacy while recreating in the backcountry.

SSMA has undergone the following environmental initiatives:

- Providing a fleet of six (6) snowmobiles which are upgraded to the newest models each year to
 ensure they use the most environmentally friendly engine on the market (e.g. reduced exhaust,
 odour, sound). New snowmobiles each year allow for less likelihood of mechanical failures such
 as fluid leaks.
- Client snowmobiles will be inspected prior to entering the backcountry to ensure there are no environmental issues present on their machines (e.g. fuel or fluid leaks).
- Prior to entering a particular area, clients will be briefed on the wildlife conservation guidelines
 as well as any issues under the Species at Risk Act. Clients will learn how to find this information
 on their own for future backcountry trips. This will eliminate or limit adverse effects on wildlife
 and wildlife habitat in accordance with provincial and federal regulations.
- Guide snowmobiles are well stocked with appropriate spill kits in the event of a mechanical failure.
- There will be no removal of vegetation, soil, fossils, or artifacts of any kind.

SSMA will make no changes to any infrastructure, and consequently there will be no negative effects on drainage, flooding, and public access.

As the application does not include any intensive use sites or land altering activities, no archaeological investigations were undertaken for this application.

All areas overlap with whitebark pine (WBP) critical habitat. No alterations to the landscape which would disturb WBP are anticipated for SSMA activities. Clients will be made aware of Leave no Trace principles and the presence of WBP.

The "Stewardship Management Agreement Regarding Management of Snowmobiling in Mountain Caribou Habitat in the Central Selkirk Area" has been included in <u>Appendix D</u>. The Meadow tenure area is adjacent to this Management Area and SSMA is familiar with the principles and shared stewardship roles and responsibilities outlined within this document. SSMA is committed to caribou stewardship and will take all necessary steps to minimize disturbance and to educate clients on this species at risk.

2.1 Fish Values

No concerns to fish values have been identified for the purposes of this application.

2.2 Wildlife Values

Assessment completed by:

Ryan Gill, R.P.Bio
Tarn Environmental Consulting

The tenure application is comprised of 8 individual areas within the ESSF BEC zone (subzones dc, dcp, dcw, wc, wcp, wcw, wh, wm, wmp, wmw), in the Selkirk Mountain range. Tenure areas and resource roads used to access these areas transit habitat occupied by species designated as 'at risk', as well as species which have specific, seasonal habitat needs.

A detailed environmental overview of all wildlife, and natural resources has not been conducted as part of this review. However, a high-level assessment of mapped ungulate winter range, caribou herd ranges, grizzly bear population units, Wildlife Habitat Areas, and known occurrences available from the conservation data center through iMap, and the Habitat Wizard were conducted. These layers were compared to the tenure application and areas of overlap, and potential conflict with wildlife values were identified.

These reviews revealed ungulate winter range (UWR) for mule deer (*Odocoileus hemionus*), occur throughout the local area. Mule deer UWR polygons occur on low elevation, generally south aspects through which existing roads, and approved access routes transit. Interactions between mule deer and the proposed activities are likely along low elevation, south aspects.

Tenure areas fall within 3 broad coverage Grizzly Bear Population units – Valhalla (High conservation concern [Ladybird, Norns]), Selkirks South (High conservation concern [Giveout Creek], and Central Selkirks (Moderate conservation concern [Six Mile, Meteor Mines, Redfish, Krao Cutblocks]). Grizzly Bear Management Priorities are mapped as polygons, and all tenure polygons except Meadow, Norns and Ladybird are contained within these polygons.

No Wildlife Habitat Areas (WHA) occur near the tenure polygons. Regardless of the lack of WHAs for grizzly bears, there are potential interactions by the proposed activities and grizzly bears. The timing of use of the tenure areas by the applicant and seasonal use by bears of these elevations, indicates that the probability of encountering grizzly bears is low. However, disturbance of dens, or bears emerging from hibernation is possible in late winter and early spring.

The tenure polygons overlap with known, or historic ranges of 2 sub-populations of southern mountain caribou (*Rangifer tarandus*). Giveout Creek falls within the South Selkirks sub-population, which is currently listed as 'extirpated', with the last animals of this sub-population being moved to the Columbia North herd in 2018. The Meadow Creek tenure polygon overlaps with the Central Selkirks sub-population, which is estimated to be 26 animals (2020 estimate). There is potential for interaction with southern mountain caribou in this polygon, and seasonal, and temporal closures to protect this species must be followed to mitigate effects on this imperiled species. In addition to these caribou ranges, there is mapped critical habitat identified near the boundaries of Giveout Creek. No overlap of tenure polygons with this critical habitat is predicted.

In addition to wildlife values, several mapped, land use planning polygons overlap with the tenure polygons. The access road to the Meteor Mines polygon, and the polygon itself, lie at the headwaters of Springer Creek, mapped as the community watershed providing water to Slocan, BC. All tenure polygons overlap with existing trapline tenures, whether these are all active is unknown.

SSMA will adhere to the desired behaviours in the Wildlife Guidelines for Backcountry Recreation/Tourism in BC. Specific behaviours that guides and clients will adhere to are:

- Maintain minimum default distances from known values.
- Comply with the Wildlife Act and Federal Fisheries Act at all times during operation.
- If wildlife are encountered along access roads, guides and clients will stop the machines and allow the animals to move off the access road. Machines will be paused until the animals have moved far enough away that they will not be disturbed by the passage of snowmobiles.
- If wildlife are encountered in tenure polygons (likely to be grizzly bear, wolverine, or southern mountain caribou), immediately leave the area and report the coordinates of any sightings.
- Record and report all wildlife encounters.
- Minimize disturbance by not harassing, feeding, or handling any wildlife if encountered. If wildlife are encountered anywhere within the tenure, guides and clients will shut off the engines and yield to the wildlife.

	Juli An Chapty	
Signed:	/	

2.3 Water Values

The access road to the Meteor Mines polygon, and the polygon itself, lie at the headwaters of Springer Creek, mapped as the community watershed providing water to Slocan, BC. All SSMA operations will stay clear from and will not cross any water sources to avoid potential contamination of the watershed.

2.4 Cultural Values and First Nations

The closest non aboriginal communities to this proposed land tenure are the towns of Nelson & Castlegar. This tenure application overlaps with the traditional territories of the Sinixt and Ktunaxa First Nations, and emails have been sent to both First Nations. Correspondence with a Sinixt representative is detailed in *Appendix C*. No response was received from the Ktunaxa First Nation.

Section 3: Overlap with Existing Use

3.1 Mineral Tenures

SSMA is applying for surface use only, therefore no conflicts are anticipated with existing or proposed mining operations, including exploration, which would occur outside of SSMA's operational season.

I acknowledge that there may be mineral tenures that overlap with my area of use and understand that I may have to coordinate access and activities with the tenure holders. I further acknowledge that additional mineral tenures may be located in my area of use in the future and that I may have to coordinate access and activities with the tenure holders.

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3.2 Timber and Range Tenures

SSMA does not anticipate any conflicts with existing or proposed timber or range tenures, which occur outside of SSMA's operational season.

3.3 Recreation Site and Trail

There is no overlap in proposed tenure with recreation sites and trails. SSMA does not anticipate any conflict with access to recreation sites and trails, which typically are used outside of SSMA's operational season.

3.4 Other Overlaps with Existing Interests

A Section 16 Reserve (under the Land Act) area has been identified adjacent to Cody Caves Provincial Park. To avoid this area, two access roads have been mapped to access the Krao tenure area. Neither of these roads overlap with the Section 16 Reserve (under the Land Act) area.

A Section 17 / Ministry of Parks overlap takes place along the access road to the Six Mile and Meteor Mines proposed tenures. As this Section 17 allows for non-invasive AT activities, this application will be submitted without modification unless identified as necessary during the referral process.

SSMA is not aware of and does not anticipate any overlap with other existing interests within the proposed tenure area which are not already outlined within this application.

3.5 Land Use Planning Agreements

SSMA is not aware of and does not anticipate overlap with any Land Use Planning Agreements in this area.

3.6 Local or Regional Zoning Requirements

SSMA's proposed tenure overlaps with existing snowmobile areas, therefore it is assumed that no additional local zoning applications will be required.

3.7 Adventure Tourism Tenure & Guide Outfitter Territories

Customer Experience

SSMA has identified several niche groups that have been under serviced and has built up an existing clientele base and a positive reputation of delivering safe and fun snowmobile programs.

The niche services offered include:

- Beginner to intermediate coaching for women in an all-female class.
- Limited mixed coaching of couples and riding partners.
- Classes in French.
- Small-group personalized experiences.

Training is focused on:

- Building strong and safe backcountry travel techniques.
- Avalanche safety.
- Progression in riding skills.
- Outdoor survival.

Approximately 50% of SSMA's planned business activities are outside of the existing Nelson/Castlegar tenured area, servicing other areas of British Columbia and Quebec. The demand for clinics within existing operational areas demonstrates that there is an underserved clientele looking to book the types of programs with SSMA offers. With a strong outreach program, it is anticipated that SSMA will be able to attract about 50 people (locals and tourists) over the course of the season to come and experience the Nelson/Castlegar area.

SSMA has been operating for ten years with no accidents, and it is of the utmost importance to SSMA to maintain this record. SSMA is committed to operating by the standard practices of the industry. SSMA will by no means block or deter any access to public in any of the requested tenure zones. We encourage the public to come and track up the area to help us with operations (clients get stuck less when there are tracks in the snow already).

While a quality experience is important to all operators, SSMA provides a unique experience tailored to small groups of mostly women who may not otherwise have the opportunity to gain confidence in the backcountry.

Notification of overlap to tenure holders

SSMA has been operating in this area since 2017 under a Section 16 issued by RSTBC. Emails have been sent to all known overlapping operations, and no conflicts have been identified with other Adventure Tourism operators, snowmobile clubs, or the public.

Two snowmobile clubs operate within the SSMA proposed tenure:

- Nelson Sno-Goers (Giveout, Meadow, Six Mile), and
- Castlegar Snowmobile Association (Norns and Ladybird).

Both organizations support the proposed activities of SSMA occurring within their tenure and correspondence can be found in <u>Appendix B</u>.

The Meadow tenure area overlaps with **Selkirk Snowcat operations**. Email correspondence has taken place (<u>Appendix B</u>) and a signed Joint Use Agreement (JUA) is included in <u>Appendix A</u>.

Four Adventure Tourism businesses are currently operating / pending within the proposed Giveout tenure area:

- BC Enduro Series Inc. File 4405672 (Licence of Occupation) multiple use
- Global Riding Adventures Inc. File 4406141 (Special Event still in application stage)
- Baldface Mountain Lodge Limited Partnership File 4403467 (Licence of Occupation) multiple use
- Endless Biking Ltd. File 4406109 (Licence of Occupation) multiple use

All four of these tenure holders have been contacted and are in support of SSMA operations, and no future conflicts are anticipated since SSMA activities occur during the winter and these four operations take place during the summer months. Correspondence can be found in *Appendix B*.

Discussions and notifications have taken place and are on-going between SSMA and several of the existing tenure holders, and JUAs can easily be obtained if required.

It has been identified that a portion of the proposed Redfish area overlaps with a pending tenure application with Fresh Adventures Ltd. Two emails have been sent to discuss the potential overlap, and correspondence can be found in <u>Appendix B</u>. No response has been received at the time of this application being submitted.

The areas applied for have compatible uses where overlapping and SSMA is committed to working with other snowmobile operators to minimize conflicts and to provide a better safety network in the backcountry.

I acknowledge that my areas of use may overlap with other adventure tourism tenures and/or guide outfitting territories. I understand that I am required to contact these tenures holders and have them complete an Operator Input Form. I will receive this information from the reviewing FLNRORD office.

	Juli An Chope)	
Signed:			

Section 4: Risk Management Plans

SSMA confirms that the appropriate Risk Management Plan is in place for all proposed activities which meets and exceeds approved industry standards (along with updated COVID-19 industry standards). All first aid equipment will be located on the lead guide's snowmobile at all times. SSMA will use an inReach device and VHF radio for emergency communication, if required. Copies of the company's waivers and risk management plan are available upon request. Trip planning is based on the information collected from the Avalanche Canada forecast, company snow analysis studies, as well as several weather forecasting models to ensure the highest level of safety for our clients.

Signed:	
An Avalanche Risk Management Plan has been prepared and is available for Agency revier request.	w upon
Signed:	

A General Risk Management Plan has been prepared and is available for Agency review on request.