

APPLICATION FOR ADVENTURE TOURISM TENURE



FEBRUARY 2017

MANAGEMENT PLAN

Prepared by

DON VANDERHORST CONSULTING LTD

for

Akamina Adventures Inc.

FILE#:

LICENSE#

DATE: February __, 2017

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Authorized Signature
Crown Land Adjudication
Ministry of Forests, Lands and Natural Resource Operations

SIGNED on behalf of AKAMINA ADVENTURES INC
by a duly authorized signatory

containing 62 pages (including this page)

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Executive Summary

Akamina Adventures Inc. (AAI) is an adventure tourism company that is proposing to develop a non-mechanized Adventure Tourism facility in the headwaters of Kishinena and Sage Creeks, in south eastern BC, west of Akamina – Kishinena Provincial Park and Waterton Lakes National Park. AAI is requesting a License of Occupation, pursuant to the Adventure Tourism (AT) Policy, to conduct guided horse back and hiking tours (summer) and guided ski touring (winter), as well as the development of two Intensive Use sites to be used for accommodation facilities as well as the staging areas for the guided tours. The Intensive Use sites (approximately 5 ha in total) will include a wilderness lodge, along with a series of smaller, rustic cabins as well as an area for camping, plus a horse corral for those guests using horses to access the lodge and adjacent lands.

AAI is associated with Waymarker Hospitality, which owns and operates a number of hotels and restaurants in the community of Waterton, within Waterton Lakes National Park. Many of Waymarker Hospitality's clients and customers access the various non guided recreational facilities, including hiking, mountain biking and horseback riding as well as ski touring in the winter, within the national park and the adjacent provincial park in BC. Many of the trails that originate in the national park are connected to existing trails within Akamina – Kishinena (AK) Provincial Park, and to Crown land further west. AAI is interested in providing an opportunity for their clients and customers, as well as any other recreational users, for guided tours to access and use Crown land, and lands within the AK Provincial Park, including providing options for accommodation as part of the guided tours.

The headwaters of Akamina – Kishinena Creeks, as well as Akamina – Kishinena (AK) Provincial Park, in the far south east corner of BC, is a difficult place to reach. From the west, through BC, it is a very long, and challenging drive off of Hwy 3 along the Morrissey FSR (in excess of 4 hrs., assuming good weather and driving conditions) and other existing forestry roads, becoming increasingly worse, the closer one gets to the upper portions of Kishinena Creek, to reach the subject area. As a result, a very small number of recreational users access this area from the west, with the large majority of recreational users, including users of AK Park, accessing this area from the east via Waterton National Park. But even that access (via hiking, horseback, mountain bike or ski touring) route is a significant distance. While there are a number of public recreational opportunities in this area, the opportunities for guided tours within the parks and adjacent Crown land (in BC) are very limited. In addition, there are very few camping or accommodation facilities within the provincial park or adjacent Crown land, thus making it very challenging for recreational users to initiate activities at the trail head in Waterton and then be able to return the same day. Customers of Waymarker have regularly expressed an ongoing wish to have guided tours and options for accommodation when using the trails that

begin in the national park and continue on into the provincial park and lands beyond within BC.

In support of its application for an Adventure Tourism tenure, the company has prepared a management plan which outlines its proposed activities, a description of the lands they are proposing to use, as well as a description of other resource and public recreation uses and values in the area surrounding and adjacent to the two Intensive Use sites.

Management Plan Highlights

The following management plan incorporates a number of key highlights:

- *AAI is requesting a License of Occupation for a 30 year term to conduct guided horseback and hiking tours (summer), plus ski touring (winter), as well as two Intensive Use sites for the purposes of staging the tours. The License of Occupation includes an Extensive Use area of approximately 49 km of trails and two Intensive Use sites of approximately 5 ha in total.*

From late spring to early fall, access to AAI's tenure area will be through two main routes. The main route will originate from Alberta, through existing trails originating in Waterton National Park and then through trails within Akamina – Kishinena Provincial Park to access non status roads/trails west of the provincial park (e.g. Old Corbin Road). The second access route will be through BC, and involves use of the Akamina – Kishinena or Sage Creek FSRs, and then along non status roads (historic mining/forestry roads) that are now considered trails at this time.

- *All of the trails that AAI intends to use for their guided tours are existing routes and trails that have been used in the past by hunters, guide outfitters, hikers, mountain bikers and horseback riders as well as ski tourers, for many years. AAI is not proposing any new trail construction as part of its application, although some trail maintenance, such as brushing, will be required. It is important to note that some portions of the trails to be used by AAI are on existing designated forestry roads, which do not require an AT tenure and therefore are not part of this application.*
- *AAI is also proposing to secure a Park Use Permit (PUP) to conduct the aforementioned tours on specific trails within Akamina – Kishinena Provincial Park. This management plan only addresses the activities on Crown land outside of the park, and a separate application will be prepared and submitted to BC Parks for a PUP.*
- *In addition to providing guided recreation tours, AAI is also proposing to develop two Intensive Use sites that will be used as the staging areas for the tours (both for the tours on Crown land and those that will access the provincial park), but also include ancillary improvements related to the*

tours such as a wilderness lodge and a series of smaller, rustic cabins and an area for camping to address the demand for accommodation facilities in this area given the distance to the trailhead in Waterton National Park.

Intensive Use Area A is situated between Akamina Creek and the old Corbin Road which provides access to the western trail head for Akamina – Kishinena Park, as well as trails that connect into Waterton Lakes National Park. Intensive Use Area B will be situated north of Area A, along a historic mining/forestry road that accesses the Sage Creek FSR further north.

- *The company will be requesting, in addition to their AT application, a variance or partial exemption to the Motor Vehicle Closed Area plan. Specifically, AAI is requesting authorization to access Intensive Use Area B with a motor vehicle to bring in materials for development of the site. In addition, the company would like to request motor vehicle access to Site B to bring in supplies, such as propane and horse hay, at a minimum, once a year, at the beginning of the summer operating season, and a second time, if necessary, during the operating season. No other motor vehicle access would be required.*
- *AAI is aware that the eastern portion of the Flathead drainage has been the focus of ongoing campaigns (for the creation of a national park) by non – government environmental groups including Wildsight, Canadian Parks & Wilderness Committee, Sierra Club and others, in both Canada and the United States. AAI understands the rationale for this initiative and appreciates the overall objective of the park proposal is to ensure long term protection of the environmental values along with non – motorized recreation. AAI believes its proposal will enhance public recreation opportunities in this area, and should not be viewed as a possible negative impact on the potential creation of a protected area in the future.*
- *AAI's proposal lies within an area that has important environmental values, and there is significant public interest in potential development issues pertaining to the Flathead River watershed. Although the company has not undertaken a detailed environmental assessment of the application area, it has reviewed the existing land use plans which provide an overview of environmental values for the upper watersheds of Akamina, Kishinena and Sage Creeks, which form part of the land use planning areas. AAI is familiar (and will be compliant) with the Wildlife Guidelines for Backcountry Tourism/Commercial Recreation in British Columbia (BCMOE 2006), and will adhere to those guidelines to ensure that all operations adjacent to, or in close proximity to known wildlife habitat, will have minimal impacts on wildlife values.*

The core value and the very essence of AAI's proposal, is contingent on retaining the present wildlife, their habitat, and maintaining a respected

and pristine environment. To that end, the company's primary objectives, relative to wildlife values and habitat, includes strict adherence to government regulations and guidelines, and to monitor and avoid disturbing wildlife values and habitat, wherever and whenever possible. AAI believes that managed properly, their operation will have minimal impact on wildlife values and habitat.

- *AAI's proposed Adventure Tourism facility lies within the asserted Traditional Territories of Ktunaxa Nation Council (KNC). The Kishinena drainage holds significant cultural values to the KNC as the Kishinena and Akamina valleys provided historic access to two major passes over the continental divide used frequently by Ktunaxa to access bison hunting grounds on the prairies to the east. Known as the Buffalo Cow Trail, this includes South Kootenay Pass (headwaters of Kishinena Creek) and Akamina Pass (headwaters of Akamina Creek), which is the boundary between Waterton National Park and Akamina – Kishinena Provincial Park. An important historic campground (Little Prairie) is sited approximately 2 km west of the confluence of the Kishinena and Akamina Creeks (approximately 4.5 kms west of Intensive Use Area A). As AAI grows, the company will continue to operate on the basis of respect for the KNC Aboriginal Title and Rights with a goal of developing beneficial relationships with their communities.*

AAI is committed to conducting business in a manner that demonstrates high ethical standards and efforts to be a good corporate citizen. By working with First Nations, various government (federal, provincial, and local) agencies, local economic development organizations, other tourism operators and public recreation users, the company seeks to ensure that its operations are sustainable for the long term

The management plan was prepared by DON VANDERHORST CONSULTING, on behalf of AAI.

1.0 INTRODUCTION AND PROJECT OVERVIEW

This Tenure Management Plan (TMP) has been prepared for Akamina Adventures Inc. (AAI) for submission to the Ministry of Forests, Lands and Natural Resource Operations (FLNRO) in support of their application for an Adventure Tourism tenure to conduct guided horseback, hiking and ski touring activities, including the development of two Intensive Use sites to be used as staging areas for the tours, in the headwaters of Kishinena and Sage Creeks, in south eastern BC (see Figure 1 – 1).

The following management plan outlines AAI's use of its tenure area, a description of the adjacent Crown lands as well as an outline of other resource, commercial recreation, public recreation and environmental values and uses in the area.

1.1 *General Overview and Background*

AAI is an adventure tourism company that wishes to offer guided adventure tourism tours on Crown land in the headwaters of Kishinena/Akamina and Sage Creeks. Currently, access to this area of BC is predominately from the east, through Waterton National Park and Akamina – Kishinena Provincial Park via the Akamina Pass trailhead (west of Cameron Lake). Access to the subject area is also possible from the west, along the Kishinena and Sage FSRs, but most recreational use starts and ends in Waterton National Park.

AAI is associated with Waymarker Hospitality, which owns and operates a number of hotels and restaurants in the community of Waterton, within Waterton Lakes National Park. Many of Waymarker Hospitality's clients and customers use the various recreational facilities (trails) available within Waterton National Park and the adjacent Akamina – Kishinena Provincial Park, including hiking, mountain biking and horseback riding as well as ski touring in the winter. Many of the trails that originate in the national park are connected to existing trails within Akamina – Kishinena Provincial Park as well trail connections to Crown land further west within BC.

While there are a number of public recreational opportunities in this area, the opportunities for guided tours within the parks and adjacent Crown land (in BC) are very limited. In addition, there are very few camping or accommodation facilities within the provincial park or adjacent Crown land, thus making it very challenging for recreational users to initiate activities at the trail head in Waterton and then be able to return the same day. Customers of Waymarker have regularly expressed an ongoing wish to have guided tours and options for accommodation when using the trails

that begin in the national park and continue on into the provincial park and lands beyond within BC.

1.1.1 *Overview of the Project and the Business*

AAI is proposing to operate an adventure tourism facility that provides guided recreational tours (horseback and hiking in the summer, and ski touring in the winter) on Crown land, as well as securing a Park Use Permit (PUP) to conduct the aforementioned tours on specific trails within Akamina – Kishinena Provincial Park. This management plan only addresses the activities on Crown land outside of the park, and a separate application will be prepared and submitted to BC Parks for a PUP.

In addition to providing guided recreation tours, AAI is also proposing to develop two Intensive Use sites that will be used as the staging areas for the tours (both for the tours on Crown land and those that will access the provincial park), but also include ancillary improvements related to the tours such as a wilderness lodge and a series of smaller, rustic cabins and an area for camping to address the demand for accommodation facilities in this area given the distance to the trailhead in Waterton National Park. Intensive Use Area A is situated between Akamina Creek and the old Corbin Road which provides access to the western trail head for Akamina – Kishinena Park, as well as trails that connect into Waterton Lakes National Park. Intensive Use Area B will be situated north of Area A, along a historic mining/forestry road that accesses Sage Creek FSR further north.

For the initial phase of development, AAI's clients will access the tenure area from Waterton Lakes Lodge Hotel using the Waterton Shuttle, or use their own transportation, to the trailhead west of Cameron Lake. From the trailhead, clients will then self - guide themselves (hiking, horseback, mountain bike, or ski touring during the winter) along the Akamina Parkway Trail which originates in Waterton National Park to Forum and Wall Lakes in Akamina – Kishinena Provincial Park and eventually to the western boundary of the provincial park where it meets the eastern end of the deactivated Kishinena FSR (Old Corbin Road) and then continue further west to Intensive Use Site A.

In the future, AAI will look to secure a PUP to provide guided tours from the west boundary of Waterton National Park to IU Site A, as well as permit from Parks Canada to provide guided tours from the trailhead in Waterton National Park to the boundary of AK Park.

1.1.2 Nature and Type of Tenure

AAI is requesting a License of Occupation that includes an Extensive Use area of approximately 49 km of trails (Figure 1 – 2) and two Intensive Use sites approximately 5 ha in total (Figures 2 – 4 and 2 – 5), for a 30 year term.

All of the trails noted on Figures 1 – 1 and 1 – 2 that AAI intends to use for their guided tours are existing routes and trails that have been used in the past by hunters, guide outfitters, hikers, mountain bikers and horseback riders as well as ski tourers, for many years. AAI is not proposing any new trail construction as part of its application, although some trail maintenance, such as brushing, will be required. It is important to note that some portions of the trails to be used by AAI are on existing designated forestry roads (Figure 1 – 3), which do not require an AT tenure, therefore, only portions of each trail (Figure 1 – 2) are being applied for pursuant to the AT Policy.

1.2 Proponent

AAI is a BC incorporated company, with its registered offices situated in Kelowna, BC.

1.2.1 Corporate Summary

Incorporation Number: #BC1008728

Business Address: #229 – 1634 Harvey Ave
Kelowna, BC V1Y 6G2

Contact: Mark Pilling
Email: pillingm2@aol.com
Telephone: 780 – 908 – 3668

Figure 1 – 1: General Location Map.

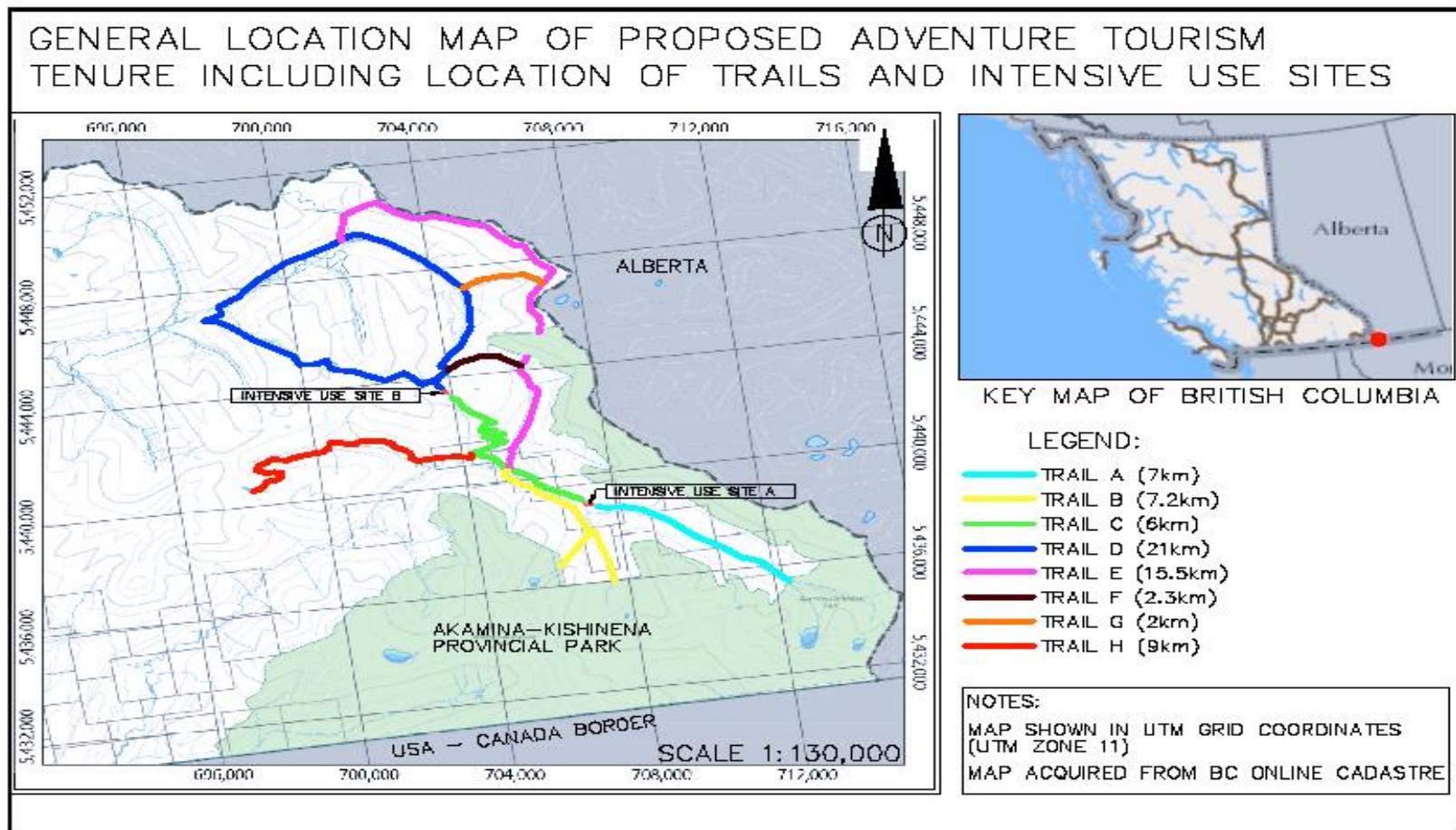


Figure 1 –2: Application Area – Extensive Area - Trails

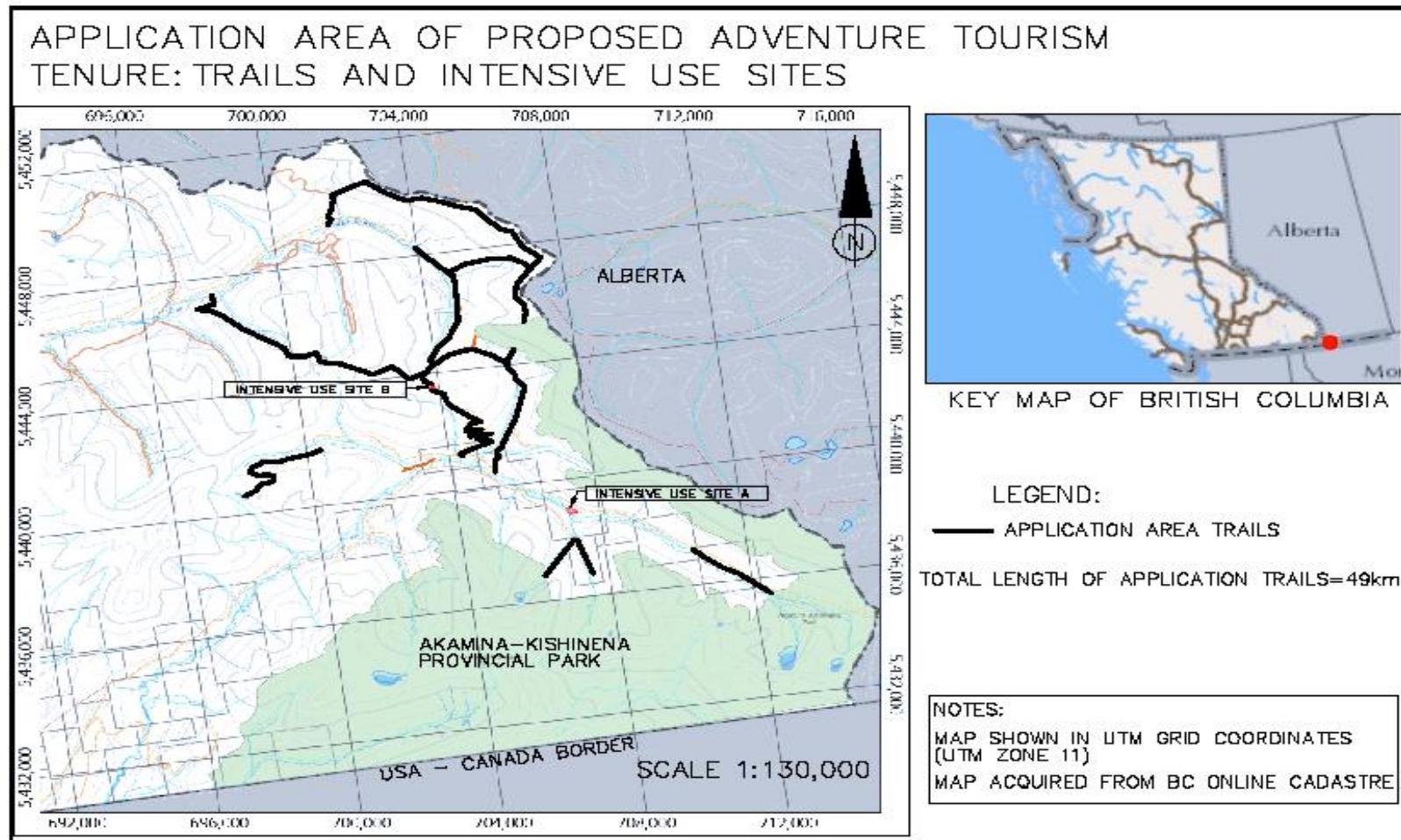


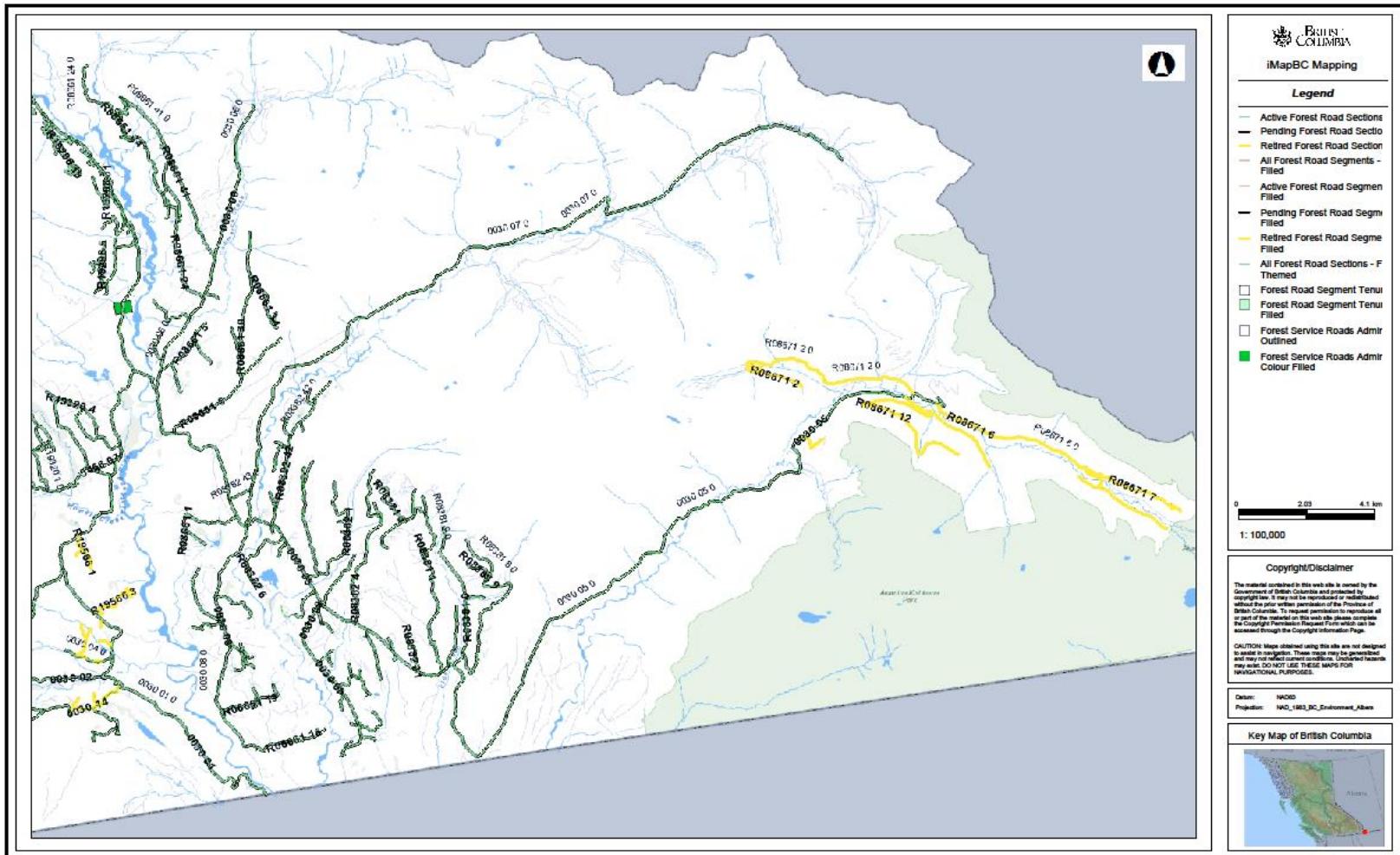
Figure 1 – 3: Existing Forestry Roads

Figure 1 – 4: **Intensive Use Area A**

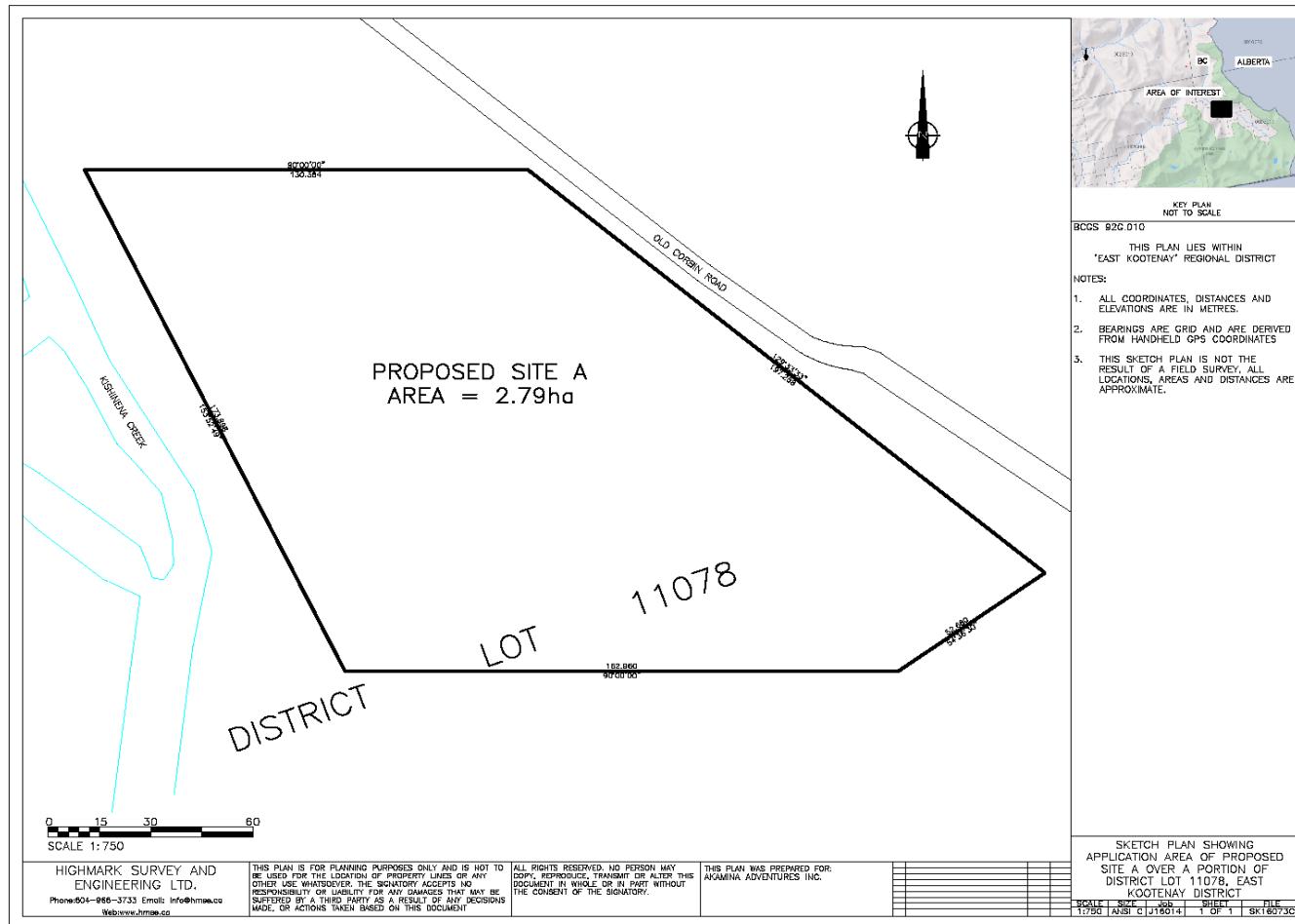
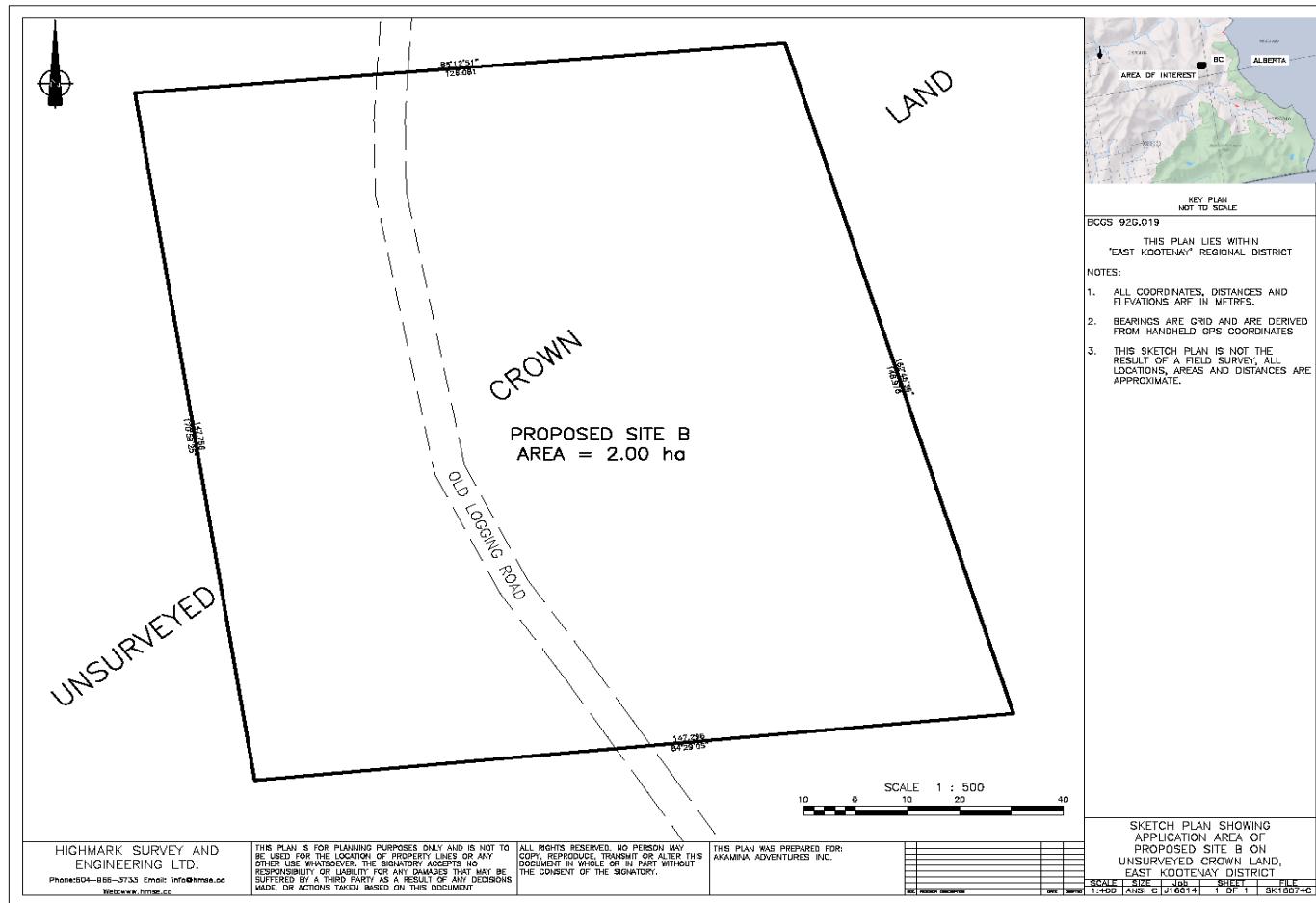


Figure 1 –5: **Intensive Use Area B**

2.0 GENERAL DESCRIPTION OF OPERATING AREA

2.1 Location and Access

AAI's proposed Adventure Tourism tenure is located on Crown land within the headwaters of the Kishinena and Sage Creeks, west of Akamina – Kishinena Provincial Park, in the southeast corner of BC (close to the borders of Alberta and the State of Montana).

AAI's activities will occur in both the summer and winter. From late spring to early fall, access to the staging areas will be through two possible routes. The main route, and where virtually all of AAI's clients will come from, will originate from Alberta, through existing trails originating in Waterton National Park and then through trails within Akamina – Kishinena Provincial Park to access non status roads/trails west of the provincial park (e.g. Old Corbin Road). At the western boundary of the provincial park, clients could then continue along the Old Corbin road further west to Intensive Use Area A. The second access route originates in BC, off of Hwy 3 and then along existing FSRs and non-status roads (historic mining/forestry roads) that are now considered trails at this time. The access route from the west is a very long, and challenging drive (in excess of 4 hrs., assuming good weather and driving conditions) and the closer one gets to the upper portions of Kishinena Creek, the roads become increasingly worse and very difficult for vehicle use.

While there is active forest harvesting in the western portions of both watersheds (Canadian Forest Products), no recent forest harvesting has taken place in the eastern areas of the Sage and Kishinena Creeks, where the application area is situated. Accordingly, the eastern portions of the FSRs have been deactivated.

During the winter period (Dec 1 – April 15), staff and clients would access the staging areas along two possible options. First option involves access (ski touring) along the Akamina Parkway Trail which originates in Waterton National Park to Forum and Wall Lakes in Akamina – Kishinena Provincial Park and eventually to the western boundary of the provincial park where it meets the eastern end of the deactivated Kishinena FSR (Old Corbin Road) and then continue further west to Staging Area A. Second option would involve the use of snowmobiles along the Kishinena FSR to the 108 km marker (where the FSR is closed for motorized traffic during the winter), and then ski touring the remaining section of the FSR to Intensive Use Area A.

There is an existing Motor Vehicle Closed Area (pursuant to the *Wildlife Act*) plan (which includes motor vehicles, ATVs, snowmobiles and motorcycles) within Electoral Area A of the Regional District of East

Kootenays, including the East Flathead area that incorporates the watersheds of Sage and Kishinena / Akamina Creeks. The Motor Vehicle Closed Area designation states that access along the aforementioned FSRs is permitted, year round, to a specific location, beyond which the FSRs have been deactivated. In the case of the Kishinena FSR, there is a short section of the deactivated road that continues further east in which motor vehicle access is permitted during the period from June 7 to September 9 of each year. For all other non-status roads/trails within this area, motor vehicle access is not permitted at any time.

While the majority of AAI's customers will originate from Waterton, the company will need, at times, to access the IU areas for supplies, maintenance and staffing, via the Kishinena FSR. Vehicle access is permitted to km 104, where the FSR has been deactivated. From that point onwards, access to Site A will be via 4 wheel drive vehicles or ATVs (during the June 7 – Sept 9 period, consistent with the restrictions outlined in the road closure plan, above). Access to Site B will originate from Site A, or via Sage Creek FSR. The access route from Site A will include a short section of the Kishinena FSR, and then along non-status trails to Site B.

The company will be requesting, in addition to their AT application, a variance or partial exemption to the Motor Vehicle Closed Area plan. Specifically, AAI is requesting authorization to access Intensive Use Area B with a motor vehicle to bring in materials for development of the site. In addition, the company would like to request motor vehicle access to Site B to bring in supplies, such as propane and horse hay, at a minimum, once a year, at the beginning of the summer operating season, and a second time, if necessary, during the operating season. Access to Site A will be via the Kishinena FSR, and any motor vehicle access would occur within the dates permitted in the Motor Vehicle Closed Area designation. No other motor vehicle access would be required.

2.2 *Current Use of Site*

While there is no development (resource or recreation) in the area where AAI is proposing to conduct its guided tours, this part of the Akamina – Kishinena watersheds has experienced historic forestry and mining activities. Today, there is no active resource development and the area is a popular recreation area for both summer and winter recreational activities from recreational users who access this area via Waterton National Park. The two Intensive Use sites (staging areas) are currently undeveloped, with Area A containing a stand of second growth spruce trees as a result of previous forestry harvesting throughout the valley. Area B is relatively open, with some scattered trees throughout the site. The terrain on both Intensive Use sites is essentially flat with gravel soils.

3.0 COMMERCIAL RECREATION ACTIVITIES OFFERED ON CROWN LAND

3.1 *Description of Activities*

3.1.1 *Guided Horseback and Hiking Tours – May 15 to Oct 15 (weather permitting)*

In the snow free season; AAI's Intensive Use sites become a perfect base for hiking and horseback tours on lands surrounding the two staging areas. The summer season normally starts in around June 1st and stretches until approximately September 30th. AAI anticipates that many of their guests will take advantage of the guided tours and accommodation options, while others will use the accommodation facilities and undertake non – guided tours by themselves, before returning to the trail head in Waterton.

A typical day for a guided group (hiking or horseback tour) will start at one of the two IU Areas, with breakfast at 7:30 am. The tour options for the day will be based on the group's ability and weather conditions. The tour will usually begin at 9:00 am and end back at the IU Area in around 4:00 pm.

The company has identified several trails they intend to use for their guided tours, all of which are existing routes and trails that have been used in the past by hunters, guide outfitters, hikers, and horseback riders, etc. for many years (Figures 1 – 1 and 1 – 2). AAI is not proposing any new trail construction as part of its application, although some trail maintenance, such as brushing, will be required.

Trail A:

This trail connects the western boundary of AK Park to Intensive Use Area A, and is the route that the majority of customers will use to access AAI's proposing license area. This trail follows the old Corbin Road adjacent to Akamina Creek.

Trail B:

The beginning of this trail is at the confluence of Akamina and Kishinena Creeks (west of IU Area A). Clients will begin their tour at IU Area A, with a short section along Trail C, until the confluence of Akamina and Kishinena Creeks which is beginning of Trail B. At this point, clients will cross the creek, and continue east along the south side of Akamina Creek before heading south toward AK Park. There are two destinations within the park that this trail provides. The first route is Ashman Lake which is an

alpine lake surrounded by majestic mountain vistas and peaks. There is no camping permitted at the lake or any camping facilities nearby, so clients will return will the IU Area A for their overnight accommodation, as the distance to the lake from the trail head in Waterton, and return, is too far to travel in one day.

The second destination off of Trial B is Mariah Lake within AK Park. . Mariah Lake has similar characteristics as Ashman Lake, and is an excellent destination for hikers and horseback riders. As with Ashman Lake, the return distance to the trail head in Waterton is too far, therefore, clients will return to IU Area A for overnight accommodations.

Trail C

This trail is the main access route between IU Areas A and B. IU Area B is situated in a key location, at a higher elevation, in order to allow access to trails to the west, as well as access to the east to areas within AK Park. IU Area B will be the staging areas tours to Heart Lake (Trail D, as noted below), as well as access to Trails E, F and G which provides access to that portion of AK park that abuts the western boundary of Waterton National Park including Beavertail Falls trail which include two 350 m waterfalls flowing from Beavertail Lake. Both the lake and falls are stunning and rarely seen given the lack of camping/lodge facilities in the area and the fact that camping is not permitted in AK Park. Hikers can also scramble up the adjacent challenging King Edward and Starvation Peaks which are the tallest mountains (in BC) within the Clark Range of the Rockies. Access to the trails beyond IU Area B is not possible without the establishment of IU Area B, as the distance is too far from IU Area A for daily tours.

Trail D

This trail begins at IU Area B, and goes in a northwest direction toward Heart Lake and Sage Creek, and then loops back adjacent to Sage Creek and then returns to IU Area B. Heart Lake is a pretty alpine lake surrounded by majestic mountains and peaks. This trail offers a great hiking /horseback destination with numerous lunch spots, vertical sheers and breathtaking vistas. Heart Lake is rarely used by anyone since there are no camping facilities at or near the Lake. The Heart Lake trail loop follows existing trails and allows guests to hike/horseback adjacent to Sage Creek with its numerous waterfalls, deep pools and beautiful mountain vistas.

Trail E

This trail can be accessed from either IU Sites A or B (using either the H or G cut off trails) or off of the north end of Trail D (Sage Creek). A portion of this trail lies along the continental divide that separates BC from

Alberta. This portion of the trail is part of the Great Divide Trail system which originates at the south end of Waterton National Park and extends northwards to Jasper National Park. The Great Divide trail is more of a route, with numerous game trails or routes where one can easily stay on the BC side. There are no plans to access Waterton National Park as part of the guided tours. As the ridges in this area are mostly barren (few trees, etc.) AAI will ensure all activity will remain in BC at all times. The Font Mountain /Great Divide Trail is sure to be one of the more popular hikes/trail rides given it's unsurpassed stunning vistas and the numerous mountains, glaciers, forests and valleys that can be seen along the route.

Trails F and G

Both of these trails are essentially cut off trails that are accessed from IU Area B as well as off of Trail D, and provides access to the Trail E (Great Divide Trail). The view from both trails is spectacular as one looks down into the Sage Creek drainage to the north and up to the many peaks forming the Great Divide Trail. Once on top of the Great Divide trail, hikers/horseback tours can head back south and take Trail F to either IU Area A or B.

Trail H

This trail provides access to Edge Lake, and can be accessed from either IU Area A or B. Edge Lake is a stunning alpine lake surrounded by majestic mountains and peaks particularly to the west. This trail is a great hiking /horse destination with numerous lunch spots and breathtaking views and vistas at every turn of the trail. The lake is rarely used by anyone since there are no camping facilities at the lake or surrounding area. Edge Lake is unique in that it is situated on the edge of a 350 m. cliff, defying logic that it can maintain its water levels.

3.1.2 Guided Backcountry Ski Touring - Dec 1 – April 15 (weather and snow conditions permitting)

AAI is proposing to offer winter guided activities (ski touring), using the accommodation facilities in the two Intensive Use sites as a base and staging area for its winter based activities. The company is proposing to offer guided ski touring on Trails A, B, C, D, E and F (see Figures 1 – 1 and 1 – 2), including trails in AK park, pursuant to a proposed PUP. AAI is proposing to offer 2, 3 and 5 day tour packages with most tours starting on the Friday of each week.

A typical day for a guided group will start with breakfast at 7:30 am. The tour options for the day will be based on the group's ability, present snow stability, the weather forecast and skiing conditions in relation to the snow

quality. The ski tour will usually begin at 9:00 am and end back at the IU Area around 4:00 pm.

4.0 INTENSIVE USE SITES

AAI will be using a series of existing trails as well as historic mining and forestry roads for its guided summer and winter tours. No new trail construction is being proposed, although some trail maintenance will be required on an annual basis.

As part of its guided recreational tours, AAI will also develop two Intensive Use (IU) sites, to be used as staging areas from which all of its tours (including those proposed within AK Park) will originate. Due to the lack of camping and accommodation facilities in this area, and the distance from the trail head in Waterton, AAI is proposing to develop accommodation facilities within both IU sites. This will include a main wilderness lodge, along with several smaller cabins, camping sites, as well as facilities for the horses. During the winter period, AAI would only offer lodging facilities. All clients and staff would be required to bring in their own food and related supplies, and pack out their own garbage. AAI will provide propane for cooking purposes, and fuel for a generator and ensure there is sufficient supplies in place for the winter period. This business model (winter) is consistent in how Cameron Lake Cabin in Waterton National Park operates, along with other winter use lodges in BC.

Intensive Use Site A

This site is situated off the Old Corbin Road and is approximately 2.79 ha in size (see development plan – Figure 4 – 1). The proposed development contemplates the construction of a main lodge, several small cabins, a camping area, a horse corral, and related services (e.g. toilets, outdoor showers, garbage collection site, etc). A preliminary design of the main lodge and the cabins (front view and interior layout) for both IU Sites A and B, are shown on Figures 4 – 7, 8, 9 & 10).

Intensive Use Site B

This site is situated adjacent to a historic mining exploration road (Trail C) that links the Sage Creek and Kishinena Creek watersheds. Site B is approximately 2 ha, and is situated at a substantially higher elevation than Site A. It will contain a similar type of development as outlined for Site A (see development plan – Figure 4 – 4).

Intensive Use Site Services

Water

For Site A, AAI intends to access water directly from Akamina Creek which is adjacent to the site. Water will be pumped via a solar operated electric pump with a 1.5" pvc collector or intake pipe inserted directly into the active steam channel. The solar panel and pump/filter assembly will be housed in a self-contained 4'X3" plywood box located on the backside of one of the camping cabins. The filtered water will be pumped via a 1" PVC surface delivery pipe directly to the main lodge's 250 gallon holding tank to be used as required. The company is aware that it will require a water license for this use.

For Site B, the company intends to access water directly from a small unmarked flowing spring which is adjacent (west) to the site. Water will be gravity fed via a 1.5" pvc collector or intake pipe inserted directly into the active channel. A filter assembly will be housed in a self-contained 4'X3" plywood box located on the backside of one of the camping cabins. The filtered water will be gravity fed via a 1" PVC surface delivery pipe directly to the main lodge's 250 gallon holding tank to be used as required. AAI will obtain a groundwater commercial water license pursuant to the 2016 Water Sustainability Act as well as comply with all other related rules and regulations.

Sanitary Septic Disposal

For both IU sites, AAI intends to construct an onsite sewage disposal system to be comprised of a septic tank and dispersal field which will be located within the IU site. AAI will comply with the Provincial Sewerage System Regulations as well as all other related rules and regulations.

Garbage

Garbage will be stored in bear proof storage container, as detailed on the IU Site plans, and removed weekly (summer) to the appropriate land fill site located in Fernie.

Heating and Electricity

Given that AAI's activities primarily take place in the summer months, minimal provisions are required for lodge or cabin heating. However, the main lodge and all cabins will be equipped with small propane as well as wood burning stoves which will be used as required. AAI will obtain necessary firewood permits pursuant to the *Forest Act*.

The main lodge and all cabins will be equipped with solar packages (panels, inverter and battery storage) as well as super quiet Honda 2000 gas generators which will be used as required. These generators have a decibel rating of 49-60 which is no louder than normal human speech.

Fuel Storage

100 lb. or 200 lb. propane bottles for main lodge cook stoves and fridges will be stored in the storage sheds as located on the respective Site A and Site B site plans. Gasoline will be stored in 20 liter containers which will also be located in the above noted storage sheds. AAI will comply with all BC fuel guidelines.

Figure 4 – 1: **Development Plan for Intensive Use Area A** (this development plan is not the result of a formal field survey, and the location and size of all improvements are approximate and maybe altered when the site is developed)

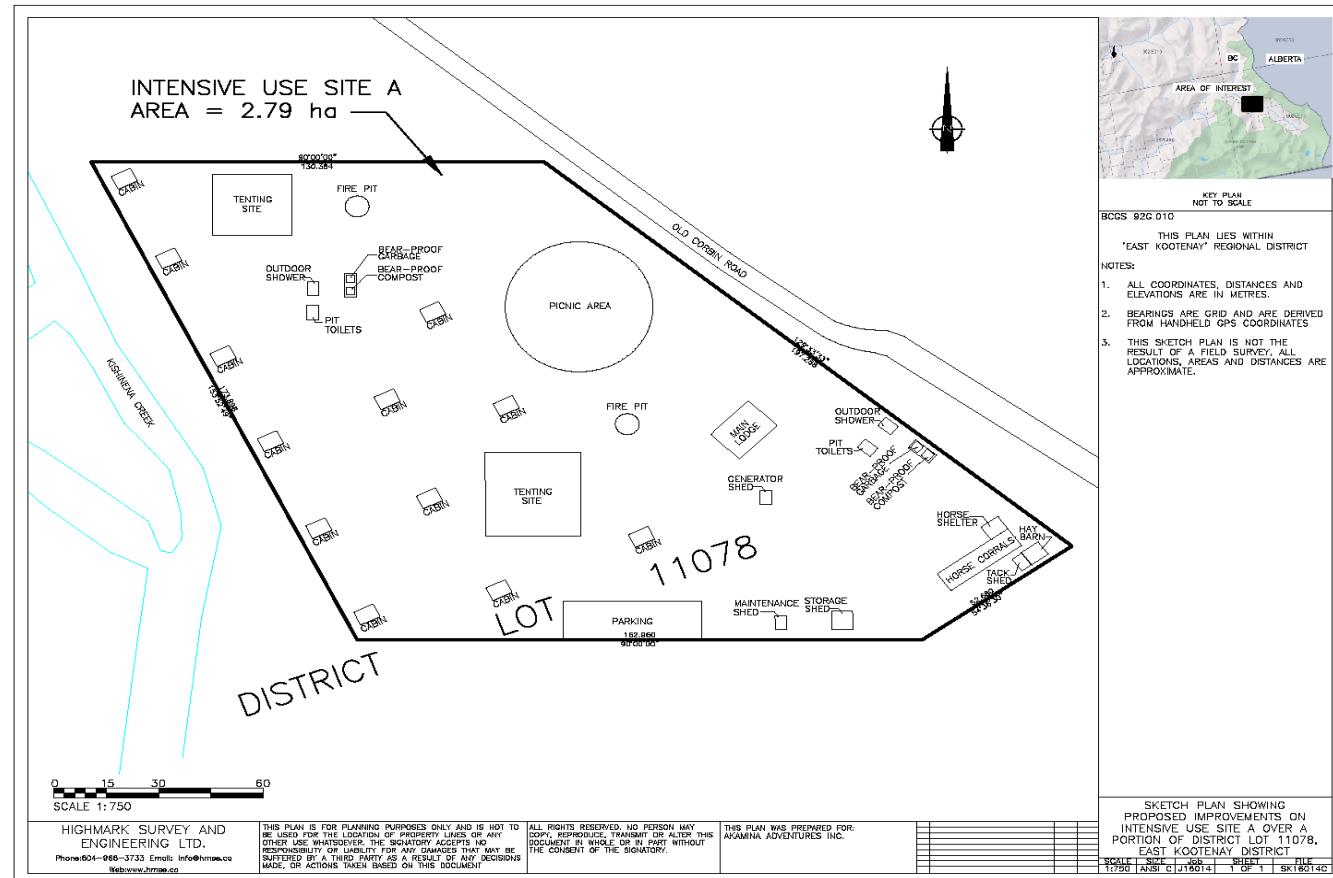


Figure 4 – 2: Looking southeast toward Waterton National Park and Akamina – Kishinena Prov Park. Historic forestry/mining road (Old Corbin Road) is shown running east/west in the center of the photo, with Akamina Creek to the right side. Intensive Use Area A is the partially cleared area to the right of Corbin Road in the center of the photo



Figure 4 – 3: *Intensive Use Area A is situated in the lower center of the photo (partially cleared area). This photo is looking southwest toward Mt Ashman and into Akamina – Kishinena Prov Park.*



Figure 4 – 4: **Development Plan for Intensive Use Area B** (this development plan is not the result of a formal field survey, and the location and size of all improvements are approximate and maybe altered when the site is developed)

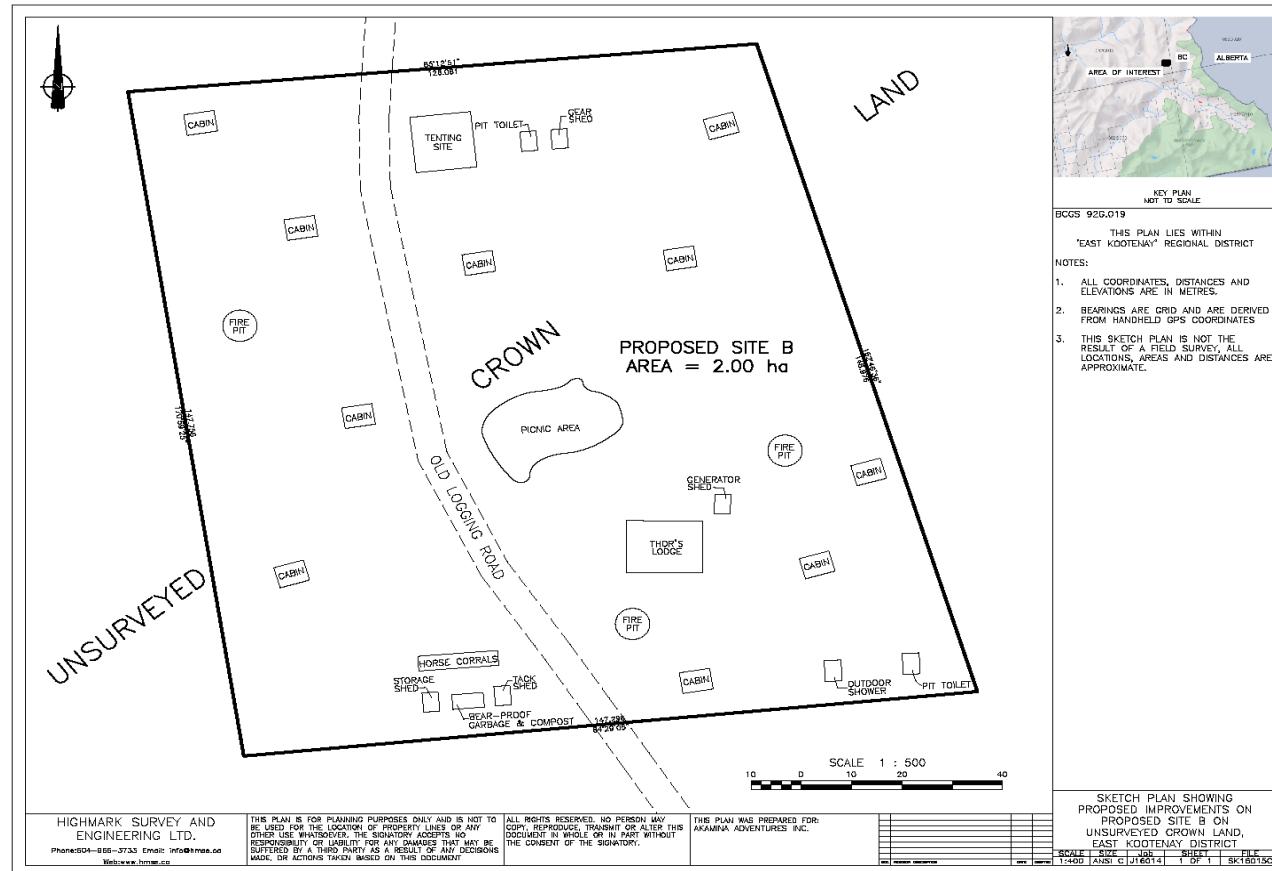


Figure 4– 5: *Intensive Use Area B is the cleared area, in the lower left side of the photo. The historic mining road is shown along the lower bottom of the photo. The photo is looking west toward Thors Mountain.*



Figure 4 –6: *Intensive Use Area B, situated in the lower center of the photo (cleared area), looking southeast into Akamina Creek (Area A is situated in the valley bottom in the center of the photo) and Akamina – Kishinena Prov Park*



Figure 4 – 7: Front View of Proposed Lodge within Intensive Use Site



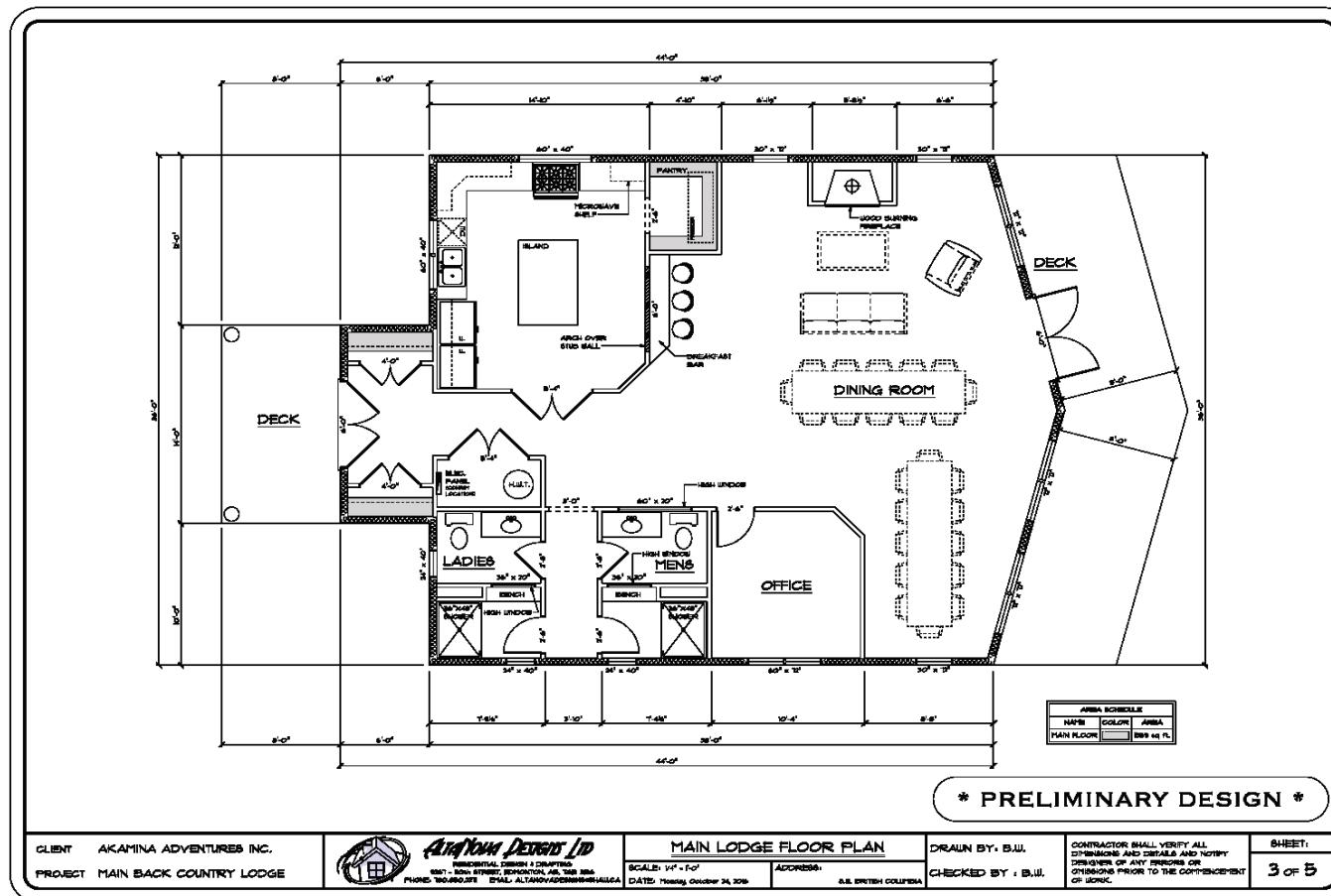
Figure 4 – 8: Preliminary Design of Proposed Lodge

Figure 4 – 9: Front View of Proposed Cabins within Intensive Use Site

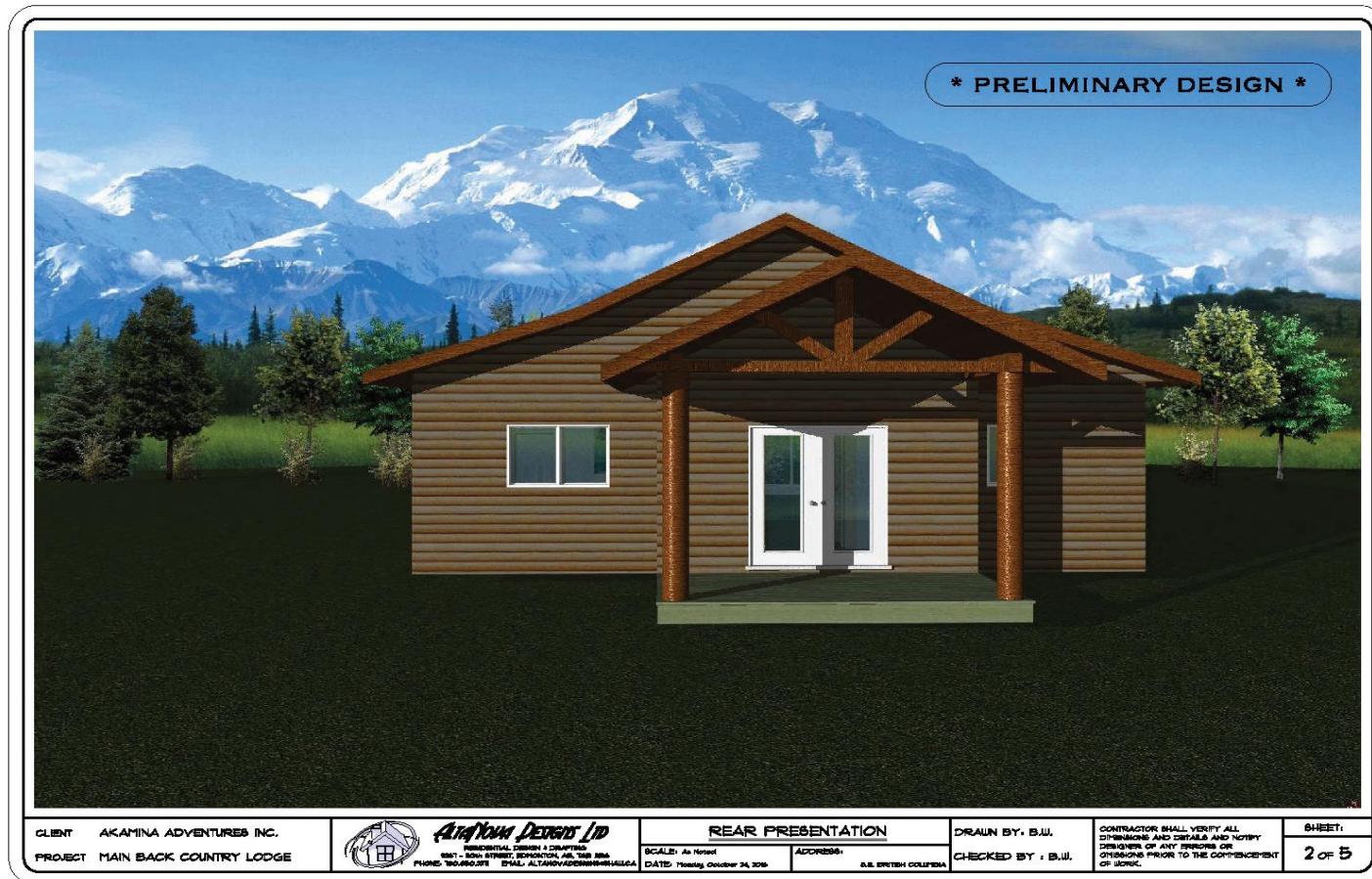
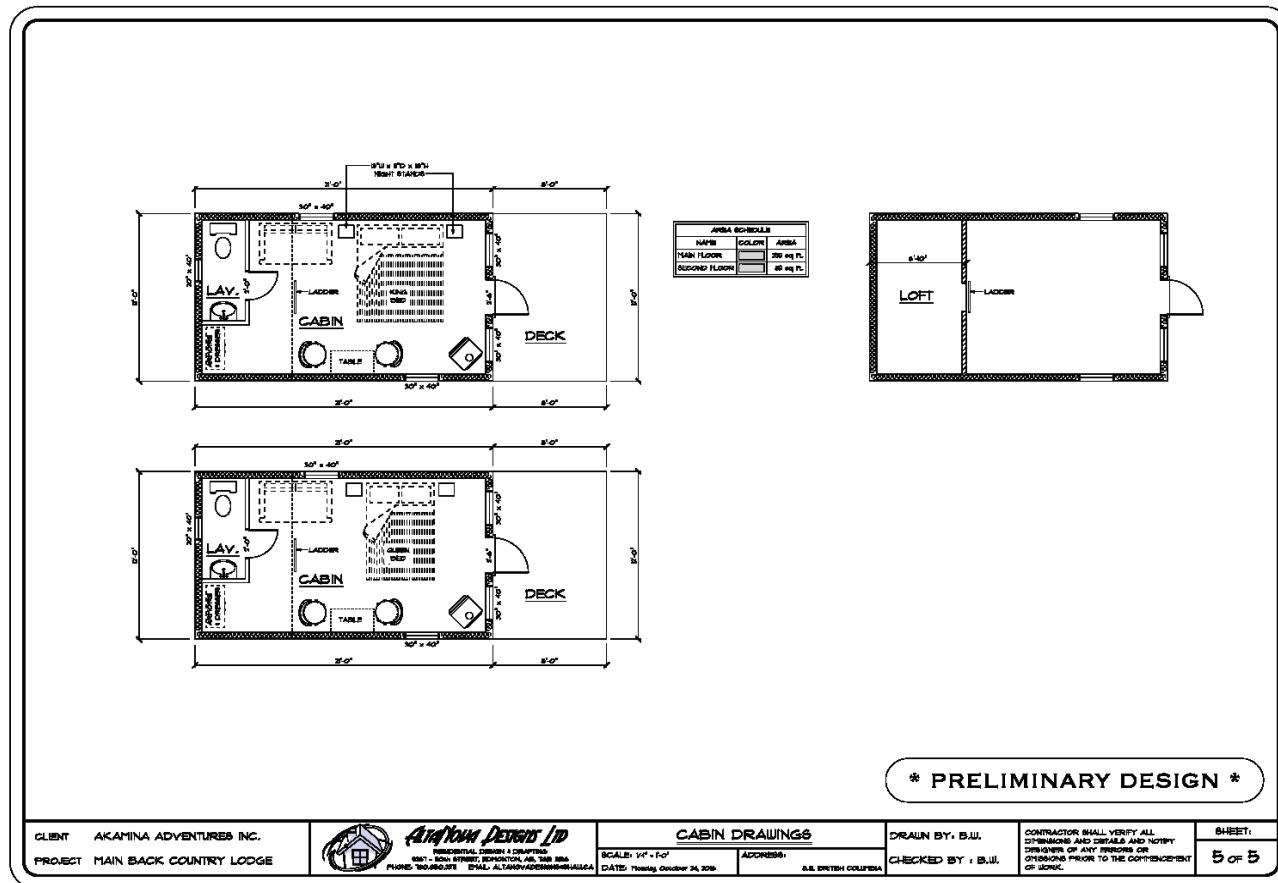


Figure 4 – 10: Preliminary Design of Proposed Cabins



5.0 LEVELS OF USE

The Adventure Tourism (AT) Policy requires that each operator provide information on the number of “client days”, defined as each commercial recreation client who the tenured operator guides onto Crown land in a particular day (up to 8 hours), and the time of year during which the activity takes place. The company’s annual report, which is prepared at the conclusion of each operating season, will reflect the total number of skiers, or client days, taken to the operating area pursuant to the fee schedule requirement of the AT license agreement.

The following Levels of Use tables outlines the utilization for the operating area, based on projected use over the next 5 years, based on realistic growth rates for the company.

5.1 *Levels of Use – Client Days/Year and Utilization*

Clients Day – Projected (Non Mechanized Guided Tours)

Year	Projected
Year 1	290
Year 2	380
Year 3	530
Year 4	600
Year 5	600

Five Year Pro-Forma Annual Tour Projections

Year One

Description	Annual # Tours	Cust. Per Tour	Total Clients Yr.
Horseback riding tours	20	8	160
Guided hiking tours	15	6	90
X-Country Ski tours	10	4	40
Totals:	45		290

Year Two

Description	Annual # Tours	Cust. Per Tour	Total Clients Yr.
Horseback riding tours	25	8	200
Guided hiking tours	20	6	120
X-Country Ski tours	15	4	60
Totals:	60		380

Year Three

Description	Annual # Tours	Cust. Per Tour	Total Clients Yr.
Horseback riding tours	30	10	300
Guided hiking tours	25	6	150
X-Country Ski tours	20	4	80
Totals:	75		530

Year Four

Description	Annual # Tours	Cust. Per Tour	Total Clients Yr.
Horseback riding tours	35	10	350
Guided hiking tours	25	6	150
X-Country Ski tours	25	4	100
Totals:	85		600

Year Five

Description	Annual # Tours	Cust. Per Tour	Total Clients Yr.
Horseback riding tours	35	10	350
Guided hiking tours	25	6	150
X-Country Ski tours	25	4	100
Totals:	85		600

6.0 HAZARDS AND SAFETY PLAN

The company will operate in a manner that is in accordance with its operating guidelines, as outlined in this proposal.

AAI will register with Work Safe BC, and its operations will be in compliance with Work Safe BC regulations. The following is a summary overview of the company's safety plans.

- Fuel Storage – all fuel (propane) to be stored in the shop/garage facility. All fuel storage and handling procedures will be in compliance with the Ministry of Environment's "A Field Guide to Fuel Handling", Transportation and Storage as well as the Environmental Code of Practice for Above-ground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products".
- Garbage & Animal Attraction -all garbage will be kept indoors in the storage area adjacent to the kitchen in the back of the lodge. Paper products will be burned in the lodge. Garbage will be taken out weekly and dumped at the landfill near the community of Fernie.
- Emergency Rescue Plans (including forest fires) – Emergency and evacuation plans will be developed and shared with specific agencies. The company will liaise with the local Search and Rescue (SAR), provide detailed maps of the area along with the lodge contact info (satellite phone), coordinates, helicopter contacts, nearest Doctors, on site emergency equipment and the level of Lodge staff training. Staff will be provided training for initial fire suppression (lodge and forest fire).
- All lodge clients, if they are undertaking non – guided activities, will be required to sign in at the lodge before departing, providing an itinerary along with start & expected return time, and upon returning, enter the actual return time.
- All clients will receive a safety briefing prior to embarking on any guided tours and be required to sign liability waivers. All guides will be experienced in back country travel, navigation, weather, and survival techniques and have current first aid certification and training. Additionally, all guides will be equipped with "Spot Type" GPS satellite trackers with emergency rescue notification capabilities. Intensive Use Sites A and Site B will have an ATV on site for emergency and rescue purposes.
- All ski guides in addition to the above, will be required to have a minimum of 3 years of back country winter experience as well as training through the Association of Canadian Mountain Guide Association with requisite additional training and experience in avalanche training and rescue. All

cross country ski clients will be required to be outfitted with avalanche beacons and transceivers and guides will have a backcountry rescue package (shovel, probe, transceiver, etc.) available at all times. For emergency use only, Intensive Use Sites A and Site B will have a snowmobile with rescue toboggan.

7.0 IMPACTS ON OTHER USERS

7.1 Public Use and Access

The upper watersheds of Sage and Kishinena Creeks, and AK Park, receives a reasonable, but not a high amount of public recreation use (hiking, camping, horseback riding, mountain biking, hunting), primarily during late spring to early fall. Most of the public recreation originates from Waterton National Parks, and then through and into both the national park and Akamina – Kishinena Provincial Park. Some public recreation activities does occur via the Kishinena FSR but this is significantly less than the level of public recreation use that originates from the national and provincial parks to the east. There appears to be limited public recreation access into this area via the Sage Creek FSR. Recreation Sites and Trails BC (RSTBC) has two designated recreation sites in the general area however, the application areas do not overlap or impact any of the existing RSTBC facilities.

The amount of recreational usage in this area, including the AK Park, is not likely to significantly increase in the future, primarily due to access issues, and the fact that there are other backcountry areas in this part of the BC that have better access (e.g. where you do not need to drive upwards of 4 hrs to reach the area). The difficult access into the area is one of the key considerations of AAI's proposal, as there are limited opportunities for non-mechanized guided tours, and no existing facilities for accommodation in this area, other than some limited camping sites within AK park (there are only 10 camping spots in the entire AK Park and generally these spots are normally full, making it impossible for most hikers to find a suitable location for overnight camping purposes). AAI's proposal will provide opportunities for guided tours, as well as providing accommodation options (other than wilderness camping) for those clients wanting to undertaken various recreation activities in this area but cannot access many of the recreational features as the distance from the trailhead in Waterton is too far for a daily return trip.

AAI does not believe its proposal will negatively impact public recreation use within this area, but instead, enhance the opportunities and experiences that this area provides, by providing effective staging areas from which clients can undertake daily activities.

7.2 Resource and Industrial Interests

7.2.1 *Timber Tenures and Forestry Management*

Canadian Forest Products is the existing forestry licensee in this area, although their operations are focused to the west of the application area.

For the headwaters of the Sage and Kishinena watersheds, management of the timber values are handled through BC Timber Sales (BCTS). BCTS has advised that while the existing FSRs are still active, they have been deactivated, and any existing bridges have been reduced for maximum loads. No forest harvesting is planned for this area for approximately 10 years, and therefore no work for improvements to the FSRs is anticipated in the short to medium term.

AAI is aware that if they wish to undertake maintenance of any portion of the FSRs, a Road Maintenance Agreement will need to be issued.

7.2.2 *Mineral and Energy Tenures*

While there are existing mineral tenures throughout this area, an existing reserve, pursuant to Section 17 of the Land Act, was established in early 2015, which restricts any dispositions for aggregate and quarry materials to small scale quarry operations within the reserve area, which incorporates all of the Crown land within the application area.

7.2.2 *Guide Outfitters and Trappers*

AAI's proposal is within an existing Guide Outfitter Permit (GOP) area. The GOP holder has two staging areas (one adjacent to the Sage Creek FSR and the other in close proximity to the Kishinena FSR - see Figure 7 – 1). While AAI proposes to use some of the same trails for their operations that the guide outfitter uses (using horses), AAI believes any potential impacts to the guide outfitter and his clients will be minimal as the guide outfitter normally uses his permit area at a different time period than what AAI is proposing.

7.3 Other Commercial or Public Recreation Interests.

The guide outfitter, as outlined above, also holds an Adventure Tourism (AT) tenure in this area for guided hiking and horseback tours on some of the FSRs and trails that AAI is proposing to use (see Figure 7 – 1). The guide outfitter, in addition the AT tenure, also has an existing Park Use Permit (PUP), to provide horseback tours into the Akamina – Kishinena Provincial Park, and uses his staging area adjacent to the Kishinena FSR to initiate tours for his AT and PUP tenures.

The Adventure Tourism Policy defines guided horseback and hiking tours as being compatible, so no Joint Use Agreement is required between AAI and the existing AT tenure holder in order for AAI to use some of the same trails used by the existing AT tenure holder. Discussions with BC Parks confirms that more than one commercial operator can offer guided horseback and hiking tours within the park, using similar trails, although AAI will be required to secure a valid Park Use Permit (PUP) in order to

conduct commercial guided tours within the park. AAI recognizes that its use of existing forestry roads and trails is not exclusive, and is prepared to work cooperatively with any existing tenure and PUP holders, and public recreation users, to minimize impacts for use of these roads and trails.

AAI is also aware that the eastern portion of the Flathead drainage has been the focus of ongoing campaigns (for the creation of a national park) by non – government environmental groups including Wildsight, Canadian Parks & Wilderness Committee, Sierra Club and others, in both Canada and the United States. AAI understands the rationale for this initiative and appreciates the overall objective of the park proposal is to ensure long term protection of the environmental values along with non – motorized recreation. AAI believes its proposal will enhance public recreation opportunities in this area, and should not be viewed as a possible negative impact on the potential creation of a protected area in the future.

7.4 Local Government Requirements

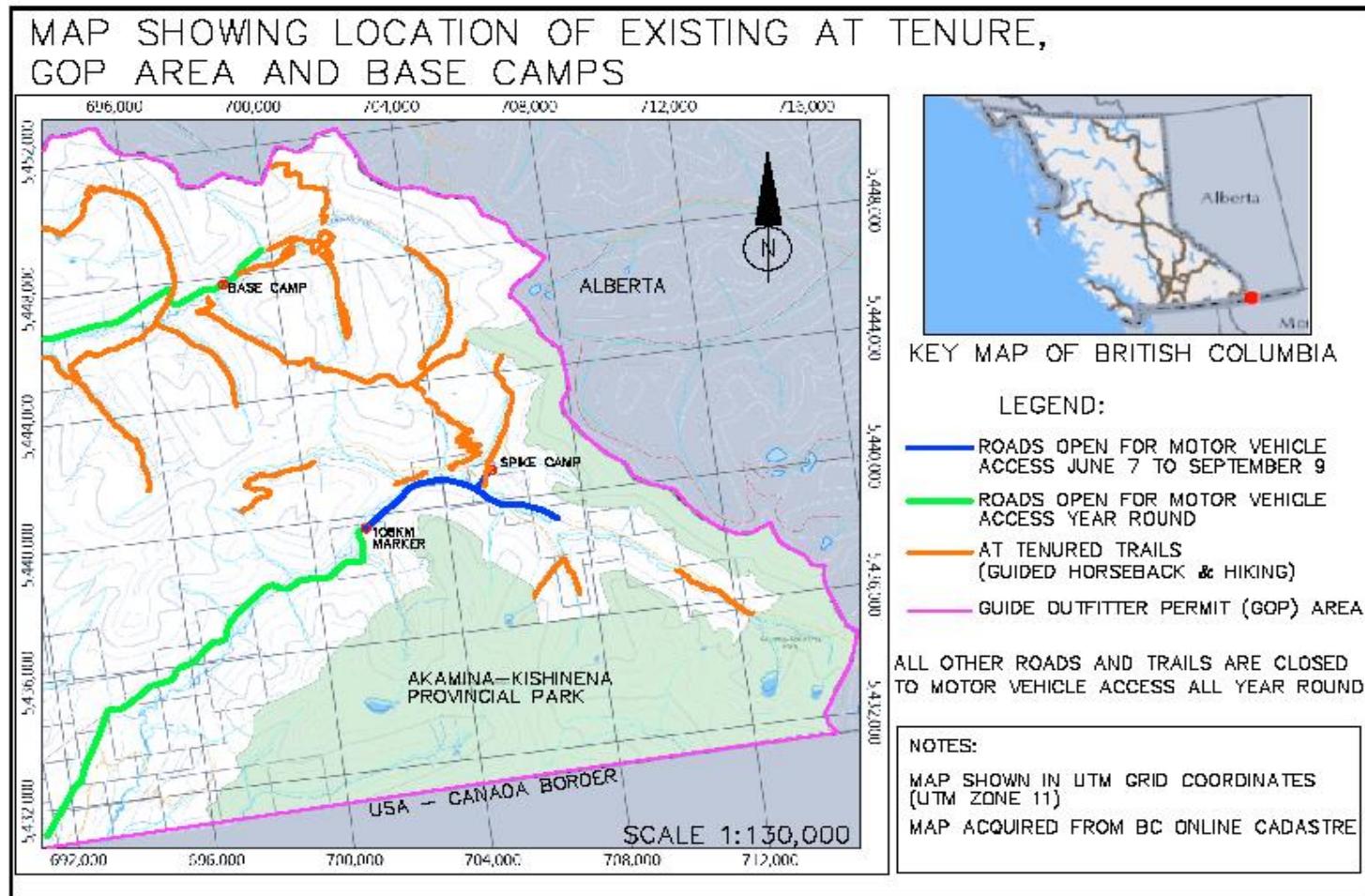
AAI's proposal is situated within Electoral A, of the Regional District of East Kootenays (RDEK). The Sage and Kishinena watersheds are part of the Elk Valley Zoning Bylaw (No 829, July 2016 Consolidation), and are zoned RR- 60, Rural Resource, and any development will need to conform to the general regulations of the bylaw.

The RR – 60 zone allows for Wildland Use (activities such as non - commercial public outdoor recreational uses as well as commercial tenured outdoor activities such as guided adventure tourism activities) and the development of Backcountry Commercial Recreation Lodges (including ancillary uses such cabins and campgrounds). In addition, any building construction (lodge, cabin, etc) will require an approved Building Permit from the RDEK prior to construction.

7.5 Existing Land Use Plans

See Section 8, Regional Planning.

Figure 7 – 1: Location of Guide Outfitter Permit Area and Existing Adventure Tourism Tenure Area



8.0 ENVIRONMENTAL OVERVIEW

- AAI is proposing to develop and operate a non – mechanized adventure tourism facility that reflects the current and future level of recreational use in this area. This area has important environmental values and there is significant public interest in potential development issues pertaining to the Flathead River watershed. AAI has reviewed the existing land use plans (as outlined below, under Regional Planning) which provide an overview of environmental values for the upper watersheds of Akamina, Kishinena and Sage Creeks, which form part of the land use planning areas. AAI is familiar (and will be compliant) with the Wildlife Guidelines for Backcountry Tourism/Commercial Recreation in British Columbia (BCMOE 2006), and will adhere to those guidelines to ensure that all operations adjacent to, or in close proximity to known wildlife habitat, will have minimal impacts on wildlife values.

The core value and the very essence of AAI's proposal, is contingent on retaining the present wildlife, their habitat, and maintaining a respected and pristine environment. To that end, the company's primary objectives, relative to wildlife values and habitat, includes strict adherence to government regulations and guidelines, and to monitor and avoid disturbing wildlife values and habitat, wherever and whenever possible. AAI believes that managed properly, their operation will have minimal impact on wildlife values and habitat.

The following section outlines some key environmental concerns and issues that may arise as a result of this project.

Regional Planning

AAI's proposed tenure area is situated within the boundaries of a number of existing (historic) land use plans that includes the south eastern part of BC. For the most part, these land use plans are not legal entities, although some specific land use decisions have arisen as a result of these previous plans, including, but not limited to, the creation of new protected areas, establishment of reserves to restrict resource development (e.g. mining) and closures for motor vehicles use to reduce impacts on wildlife values. There are two specific land use plans that provide direction and guidance to government agencies relative to resource management decisions in the area.

- AAI's project occurs in a "Special Resource Management Zone" identified by the **Kootenay Boundary Land Use Plan Implementation Strategy** (BC Government 1997). As defined by the Kootenay Boundary Land Use Plan Implementation Strategy, these Special Resource Management Zones (SRMZ) identify areas with "high concentrations of regionally significant and sensitive resource values, such as critical fish and wildlife habitat, ecosystems that are under-represented in the region's protected area system, important viewscapes, sensitive recreation areas and

cultural heritage features” (BC Government 1997: pp 6-7). Resource management priorities in these areas are to maintain these values. Development activities are “acceptable” within SRMZs, though “more numerous conditions [may be] attached or greater consideration given due to the simple fact that a greater concentration of sensitive conservation-oriented values generally exist in SRMZ areas” (BC Government 1997: p 7).

- The second land use plan that includes AAI’s proposal is the **Southern Rocky Mountains Management Plan** (SRMMP; BC Ministry of Sustainable Resource Management 2003). This is a policy document that helps guide land use planning decisions in the Flathead and upper Elk Valleys. The SRMMP includes a number of recommendations which apply to the area where the proposed project lies, but the extent to which they are applicable to permitting is unclear, given the plan’s non-legal status.

Listed Species

Numerous listed species¹ are known or suspected to occur in the project area. Table 1 details 39 species that are confirmed (29), probable (6) or possible (4) occurring in the Kishinena drainage². Half of these species are herbaceous plants (17) or trees (2). Seven of these species are listed on Schedule 1 of the federal *Species at Risk Act* (SARA) as either Endangered or Threatened indicating they have increased individual and habitat protection measures. Application of SARA prohibitions and protection measures to provincial crown land is unclear and often species-specific. Provincial policy on application of SARA is equally uncertain. This list does not include species that occur only on the provincial blue list that are not confirmed from the Kishinena drainage. Forty-three blue-listed plants are known from habitat types of the Rocky Mountain Forest District that occur in the project area (BC Conservation Data Centre 2016a). Some of those are included in Table 1, but most are not.

Many of these plant species occur in British Columbia only in the Crown of the Continent ecosystem that includes the Kishinena drainage. The Crown of the Continent is recognized as an ecosystem that supports remarkably high biodiversity relative to other Rocky Mountain regions (Parks Canada 2010). Site-specific requirements of these plants and where they might occur in relation to the proposed project is not part of this report. Several species can probably be ruled out as not likely to occur in an area that the proposed project would impact. However plant inventory and mapping is notoriously lacking in detail.

¹ Scientific names for most species are provided in Table 1. Where species are not included in Table 1, its scientific name is provided in text.

² Kishinena drainage includes all tributaries, including Akamina Creek where the proposed project is located

Though most species in Table 1 are known to, or probably occur in the Kishinena drainage, some are less likely to occur at the mid - to upper-elevations where most of the project development is proposed. Examples include Western Screech-owl and Gillette's Checkerspot. However, recent inventory efforts for these species did not include sites near the proposed project (Hobbs 2013; Dulc and Hobbs 2014). Other species have lower probability of occurring in the area, e.g. Rocky Mountain Tailed Frog (Hobbs and Adams 2015).

Wildlife

The three main species of high public value and conservation concern for the area are Mountain Goat, Bighorn Sheep and Grizzly Bear. All three species are provincially blue-listed and all are known to occur in the proposed project area. A fourth species, Wolverine, is also a blue-listed species that occurs in the area and is highly sensitive to human disturbance. Both Wolverine and Grizzly Bear are federally "Special Concern", though neither are included on SARA Schedule 1 (Table 1).

Bighorn Sheep in the Flathead population are poorly surveyed and distribution and trend is unknown. Though his primary focus was Mountain Goats, Poole (2013) observed bighorn sheep while surveying for goats. He did not observe sheep in the goat survey block 32 extending from Sage Creek to the US border in the Kishinena drainage (Figure 8 – 2), but did observe sheep in other goat survey blocks to the northwest. In this area though. Bighorn Sheep tend to be more in ranges along the Continental Divide (Alberta border; Stent et al. 2013).

AAI's proposal (specifically the Intensive Use sites) do not occur in Mountain Goat or Bighorn Sheep habitat, so are unlikely to directly impact these species.. However, increased backcountry use has the potential to lead to more goat and sheep encounters with humans potentially altering habits and movements. This is true for both summer clients accessing higher elevation areas and for winter guests accessing adjacent slopes for backcountry skiing opportunities that may overlap with goat and sheep winter ranges.

Table 1: Listed species with known or potential occurrence in the Kishinena drainage. Note: to keep the table concise, this list does not include provincial blue-listed species that are not confirmed to occur in the watershed. COSEWIC = Committee on Status of Endangered Wildlife in Canada (species with blank entry for COSEWIC have not been assessed); SARA = Species at Risk Act (species occur on Schedule 1 of SARA as Endangered [E], Threatened [T] or Special Concern [SC]). Order of occurrence probability: confirmed > probable > possible > unlikely. Data sources: BC Conservation Data Centre 2016a; BC Conservation Data Centre 2016b; BC Ministry of Environment 2016; eBird 2016.

English Name	Scientific Name	Occurrence	Element Type	BC List	COSEWIC Status	SARA
Alpine Springbeauty	<i>Claytonia megarhiza</i> <i>var. megarhiza</i>	confirmed	Herbaceous Plant	Blue		
Androsace Buckwheat	<i>Eriogonum androsaceum</i>	confirmed	Herbaceous Plant	Red		
Arrow-leaved Rattlesnake-root	<i>Prenanthes sagittata</i>	confirmed	Herbaceous Plant	Red		
Blunt-sepaled Starwort	<i>Stellaria obtusa</i>	confirmed	Herbaceous Plant	Blue		
Elk Thistle	<i>Cirsium scariosum</i> <i>var. scariosum</i>	confirmed	Herbaceous Plant	Blue		
High Alpine Butterweed	<i>Packera contermina</i>	confirmed	Herbaceous Plant	Blue		
Large-flowered Brickellia	<i>Brickellia grandiflora</i>	confirmed	Herbaceous Plant	Red	Not at Risk	
Large-headed Groundsel	<i>Senecio megacephalus</i>	confirmed	Herbaceous Plant	Blue		
Lyall's Phacelia	<i>Phacelia lyallii</i>	confirmed	Herbaceous Plant	Blue		
Montana Larkspur	<i>Delphinium bicolor</i> ssp. <i>bicolor</i>	confirmed	Herbaceous Plant	Blue		
Mountain Bog Gentian	<i>Gentiana calycosa</i>	confirmed	Herbaceous Plant	Red		
Nuttall's Draba	<i>Draba densifolia</i>	probable ^t	Herbaceous Plant	Blue		
Nuttall's Sandwort	<i>Minuartia nuttallii</i> <i>var. nuttallii</i>	confirmed	Herbaceous Plant	Blue		
Parry's Townsendia	<i>Townsendia parryi</i>	confirmed	Herbaceous Plant	Red		
Purple Meadowrue	<i>Thalictrum dasycarpum</i>	confirmed	Herbaceous Plant	Red		
Rocky Mountain willowherb	<i>Epilobium saximontanum</i>	Possible	Herbaceous Plant	Red		
Sheep Cinquefoil	<i>Potentilla ovina</i> var. <i>ovina</i>	confirmed	Herbaceous Plant	Red		
Wyoming Kitten-tails	<i>Synthyris wyomingensis</i>	confirmed	Herbaceous Plant	Blue		
Payson's Sedge	<i>Carex paysonis</i>	confirmed	Sedge	Red		
Limber Pine	<i>Pinus flexilis</i>	confirmed	Tree	Red	Endangered	
Whitebark Pine	<i>Pinus albicaulis</i>	confirmed	Tree	Blue	Endangered	1-E

English Name	Scientific Name	Occurrence	Element Type	BC List	COSEWIC Status	SARA
Gillette's Checkerspot	<i>Euphydryas gillettii</i>	confirmed	Butterfly	Red		
Mormon Fritillary, <i>eurynome</i> subspecies	<i>Speyeria mormonia eurynome</i>	probable	Butterfly	Red		
Bull Trout, Pacific population	<i>Salvelinus confluentus</i>	confirmed	Fish	Blue	Not at Risk	
Cutthroat Trout, <i>lewisi</i> subspecies	<i>Oncorhynchus clarkii lewisi</i>	confirmed	Fish	Blue	Special Concern	1-SC
Rocky Mountain Sculpin	<i>Cottus sp.</i>	confirmed	Fish	Blue	Special Concern	
Rocky Mountain Tailed Frog	<i>Ascaphus montanus</i>	unlikely	Amphibian	Red	Threatened	1-E
Western Toad	<i>Anaxyrus boreas</i>	probable	Amphibian	Blue	Special Concern	1-SC
Common Nighthawk	<i>Chordeiles minor</i>	possible	Bird	Yellow	Threatened	1-T
Olive-sided Flycatcher	<i>Contopus cooperi</i>	confirmed	Bird	Blue	Threatened	1-T
Peregrine Falcon, <i>anatum</i> subspecies	<i>Falco peregrinus anatum</i>	possible	Bird	Red	Special Concern	1-SC
Western Screech-owl, <i>macfarlanei</i> subspecies	<i>Megascops kennicottii macfarlanei</i>	confirmed	Bird	Red	Threatened	1-E
American Badger, <i>jeffersonii</i> eastern population	<i>Taxidea taxus</i>	probable	Mammal	Red	Endangered	1-E
Bighorn Sheep	<i>Ovis canadensis</i>	confirmed	Mammal	Blue		
Grizzly Bear	<i>Ursus arctos</i>	confirmed	Mammal	Blue	Special Concern	
Little Brown Myotis	<i>Myotis lucifugus</i>	probable	Mammal	Yellow	Endangered	1-E
Mountain Goat	<i>Oreamnos americanus</i>	confirmed	Mammal	Blue		
Red-tailed Chipmunk, <i>ruficaudus</i> subspecies	<i>Neotamias ruficaudus ruficaudus</i>	confirmed	Mammal	Red		
Wolverine, <i>luscus</i> subspecies	<i>Gulo gulo luscus</i>	confirmed	Mammal	Blue	Special Concern	

[†]Confirmed occurrence in nearby Sage Pass and suitable habitat conditions occur in area.

The Kootenay Boundary Land Use Plan Implementation Strategy (BC Government 1997), section 3.4.2(f) provides guidelines for recreational developments within “grizzly bear habitats”:

Within Grizzly Bear habitats, environmental impact assessment for new construction or expansion of resorts, backcountry cabins, trails and other recreational developments should include an evaluation of potential impacts on carnivores. Development plans may include monitoring of activities and impacts on carnivore habitat and populations to ensure that limits of acceptable change are not exceeded.

In addition to high profile wildlife species discussed above, 59 species of birds were reported from the Kishinena drainage during the BC Breeding Bird Atlas survey effort (Davidson et al. 2015). These include listed species (e.g. Olive-sided Flycatcher) and species with high provincial conservation concerns, but are not necessarily listed (e.g. Harlequin Duck [*Histrionicus histrionicus*]).

The following operational strategies have been proposed to minimize impacts on three specific wildlife values within AAI’s tenure area.

Wolverine

Wolverines are blue-listed (considered to be of special concern) within British Columbia, and federally listed as “special concern” by COSEWIC but not listed on Schedule 1 of SARA. Within British Columbia, wolverines range across most of the province, albeit at relatively low densities and the AAI tenure can be considered within the provincial range. Therefore, wolverine can be expected to occur where suitable habitat exists. Wolverines have not been studied directly within the AAI tenure area.

Wolverines are solitary animals and have large home ranges in the hundreds, sometimes thousands of square kms, and daily movements of up to 65 km. Wolverine habitat use is defined primarily by the abundance and distribution of food – primarily carrion. Wolverines may be affected by human disturbance, and may avoid human activity including backcountry skiing. Of particular concern are disturbance effects on natal dens. Female wolverines establish natal dens and give birth between February and April. Female wolverine habitat selection can be a complex relationship between food availability, predation risk, and human disturbance. However, denning habitat is highly associated with alpine and sub-alpine avalanche chute habitat, where abundant food (primarily ungulate carrion) resources occur. As well, denning locations are highly negatively associated with human disturbance (i.e. dens are typically far from human activity), and rarely encountered by humans. Nonetheless, it would be prudent to consider the remote possibility of a chance encounter with a wolverine or wolverine den during summer or winter operations.

Operational recommendations

- Employ an “avoid when seen” strategy whereby AAI staff will be instructed to avoid areas where wolverines or active dens have been sighted.
- In the case of active dens, AAI should avoid the general area surrounding the active den for the remainder of the season, or until it is confirmed that the den is no longer in use.
- Record all wolverine and den sightings, including location and observations.

Grizzly bear

Grizzly bears are blue-listed (special concern) within British Columbia, and federally listed as “special concern” by COSEWIC but are not listed on Schedule 1 of SARA. Within British Columbia, grizzly bears range throughout the province except numerous coastal islands and specific areas of the southern interior, where they are considered extirpated. The AAI tenure is considered to contain “important” grizzly bear population and as such, grizzly bears can be expected to be within the general area in and around the AAI tenure where suitable habitat and environmental conditions exist.

The Flathead valley is recognized as a major population centre for Grizzly Bears (BC Ministry of Sustainable Resource Management 2003; Proctor et al. 2012). The SRMMP designated the entire area around the proposed project as a “Core Grizzly Bear area” (see Regional Planning section). The grizzly bear population in this area declined from roughly 1998 through 2008. This decline has been primarily attributed to huckleberry (*Vaccinium membranaceum*) production failure (McLellan 2015). From 2010 to present, however, populations have increased, likely as a combined result of improved huckleberry production and immigration from an increasing grizzly bear population to the south in Montana (Mowat and Lamb 2016).

Virtually all documented grizzly bear mortality in the Flathead Grizzly Bear Population Unit between 2004 and 2014 are hunter kills, whereas mortality elsewhere in the Elk Valley includes many sources including “problem” bears destroyed after contact with human developments (Mowat and Lamb 2016; Mowat et al. 2013). In order to protect the Flathead’s important Grizzly Bear population, very strict procedures will be required for the Intensive Use sites to avoid the attraction of bears.

Grizzly bears typically spend the winter hibernating in subterranean dens. While the length of the denning period varies among individuals, pregnant females generally enter dens first and emerge last; conversely, adult males typically enter dens last, and emerge earliest. Grizzly bears generally enter dens in November, and emerge in April. The timing of hibernation largely precludes overlap between

the time bears are active above ground, and the timing of AAI backcountry skiing operations. However, there is the potential for early or mid-winter emergence, in which case a possible temporal overlap with an active grizzly bear could occur. It would therefore be prudent to consider the remote possibility of a chance encounter with a grizzly bear during winter operations.

Upon emerging from dens in the spring, grizzly bears in interior mountainous areas of British Columbia typically focus on habitats providing newly emergent and succulent vegetation such as avalanche chutes and associated riparian zones. During this time (April – July), available vegetation such as the succulent growth of cow parsnip (*heracleum lanatum*) and the roots of glacier lily (*erythronium grandiflorum*) and hedysarum (*hedysarum spp.*), dominate grizzly bear diets. During late summer and fall (August – October), a shift towards berry-producing areas occurs, when interior grizzly bears focus on berry foraging to gain the fat resources necessary for winter hibernation. At this time, food sources are dominated by berry crops such as huckleberries and blueberries (*vaccinium spp.*) and soaplallie (*shepherdia canadensis*).

This pattern of food availability often results in an annual pattern of altitudinal migration in response to seasonal changes in plant availability. For example, upon emerging from relatively high-elevation winter dens, grizzly bears typically descend to lower elevations or valley bottoms to seek emerging vegetation. As snow melt proceeds upslope, bears may ascend in response to the emergence of fresh vegetation, followed by mid-summer movements towards berry-producing areas.

Given the large home ranges and associations with mountainous areas of the British Columbia interior, encounters with grizzly bears during summer within AAI's tenure are possible. However, occasional chance encounters between summer recreationalists and grizzly bears within AAI's tenure are not expected to result in a significant negative population-level effect. Furthermore, there are no conceivable habitat-related effects from AAI's summer operations. Given the possibility of grizzly bear encounters during summer, it would be prudent to consider and address this potential situation.

Operational recommendations

- Employ an “avoid when seen” strategy whereby AAI staff will be instructed to avoid areas where active grizzly bears or dens have been sighted. Consistent with BCMOE (2006).
- In the case of active dens, AAI should avoid the general area surrounding the active den for the remainder of the season or until it is confirmed that the den is no longer in use.
- Record all grizzly bear and active den sightings, including locations.

Mountain Goat

Mountain goats are a blue-listed species in British Columbia. Due to their high public appeal and management importance, mountain goats are a species of high public and management concern. The most recent Mountain Goat survey in the Flathead valley occurred in 2013 (Poole 2013). Survey effort occurred just west the proposed project site, so whether goats occur in the immediate area of the proposed project area is unknown. The survey counted 81 goats (68 adults, 13 kids) in the survey block.

In British Columbia, mountain goats occupy all the major mountain systems of mainland British Columbia. They are most plentiful within the northern coastal ranges and southern Rocky Mountains. Within the East Kootenays, relative mountain goat density varies from “few” to “moderate”.

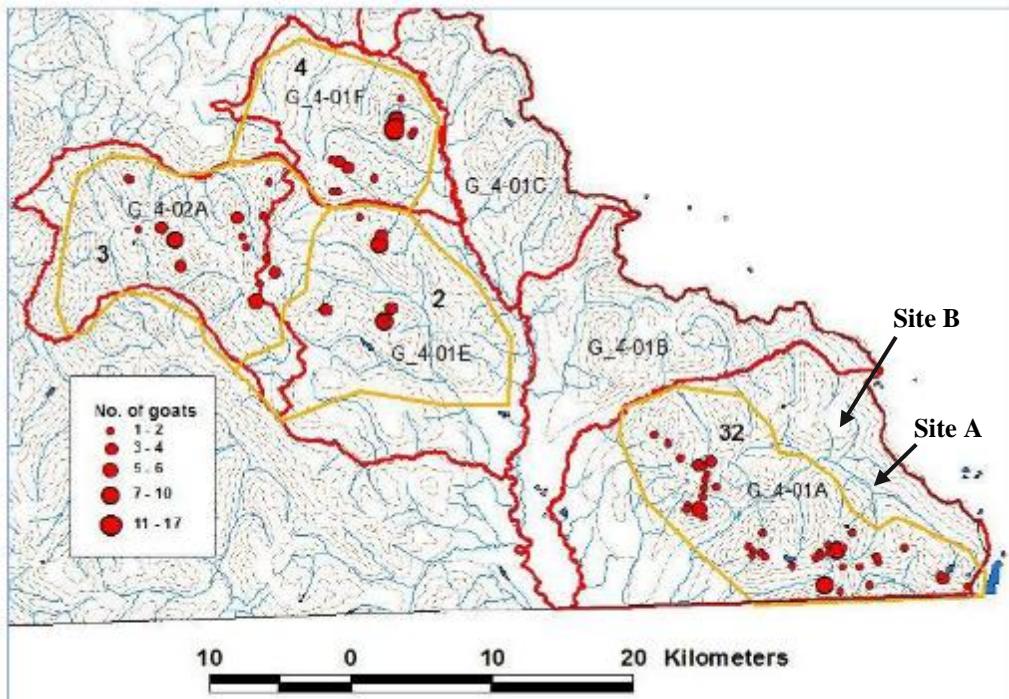
Mountain goats can expected to occur within the AAI tenure where suitable habitat and environmental conditions occur. Mountain goats are generally associated with steep (>100%) rugged terrain such as cliffs and rock faces, most frequently associated with alpine and sub-alpine environments. They inhabit steep terrain at all times of the year, presumably as a predator-avoidance strategy. However, mountain goats may venture into forests and vegetated areas adjacent to steep terrain, such as alpine meadows, to forage.

Effects of human disturbance on mountain goats have become a large concern in recent decades. However, the majority of concern over this issue relates to helicopter disturbance effects. It is unlikely that the ground-based activities of AAI (e.g., ski-touring, summer hiking) would overlap directly with mountain goat habitat in any significant way. Ground-based activities associated with AAI would therefore be of little to no concern relative to mountain goats. While no concerns or conflicts with mountain goats are currently known, there is the possibility of a conflict or concern with mountain goats in the future. It is therefore highly recommended that AAI be aware of mountain goat disturbance issues and precautions as outlined in BCMOE (2006).

Operational recommendations

- While directly encountering mountain goats during ground-based operations (e.g., ski-touring) is unlikely over the long-term, AAI should employ an “avoid when seen” strategy whereby AAI will instruct staff and clients to avoid areas where mountain goats have been sighted. Consistent with BCMOE (2006), 100 m in open terrain is the default minimum distance for non-motorized winter recreation.
- Record all mountain goat sightings, including location and observations.

Figure 8 – 2: Mountain Goat survey results from August, 2013.
Approximate locations of Intensive Use Sites A and B are marked for reference. Survey only occurred within areas outlined by yellow lines. Lack of goats outside yellow areas Source Poole 2013.



Water Resources

It is proposed that water for use within Intensive Use Site A will be drawn from Akamina Creek. Some theoretical concern may be anticipated with this use as Akamina Creek (downstream) supports populations of several listed fish species including Western Cutthroat Trout, Bull Trout and Rocky Mountain Sculpin (Table 1). Harlequin Ducks are also confirmed from the area. Harlequins nest along fast-moving mountain streams and Akamina Creek in the vicinity of the proposed project is likely to be suitable habitat.

The amount of water to be drawn from Akamina Creek for use within IU Area A is estimated to be a maximum of 25,000 gallons annually or a maximum of .00016% of the calculated annual discharge of Akamina Creek. It is the view of AAI that this amount of water use will have no impact on the water levels of the Akamina Creek and therefore will not raise any significant conservation issues. Possible climate change in the future could have an impact on the Columbia Basin but climate impact models are not conclusive. Further discussion with

aquatic / fisheries habitat biologists for the region are possible, if deemed important.

Disturbance

As noted in Section 7.1, the Akamina – Kishinena watersheds currently receives a moderate amount of public recreation use which creates some level of disturbance to existing flora and fauna, as well as Mountain Goats, Bighorn Sheep, Grizzly Bears values and habitat including the wide variety of other listed species that are known to occur in the area. The level of use proposed by AAI is not expected to significantly change the overall level of recreation use in this area, and as a result, impacts to the aforementioned values are expected to minimal.

Conclusions

The environmental assessment overview, while recognizing that AAI's proposal lies within an area that contains important wildlife values and supports very high biodiversity, does not suggest or identify any significant impediments for the proposal.

The company understands its proposed tenure area occurs within a "Special Resource Management Zone" under the Kootenay Boundary Land Use Plan Implementation Strategy and the strategy provides guidelines for recreational developments within "grizzly bear habitats". The company recognizes that the development of the IU sites, and associated non – mechanized recreation activities that will occur in the area surrounding the IU sites, can potentially have impacts on various environmental and wildlife values. Accordingly, AAI is committed to implementing the operational strategies outlined in this mgmt. plan to ensure potential impacts arising from this project will be minimized to the greatest extent possible. Discussions with the Ktunaxa Nation Council will also be pursued to determine their knowledge of existing wildlife values and habitat in this area as part of any environmental assessment process required for this project.

In summary, it is the position of AAI that its proposed non-mechanized adventure tourism activities, including the development of its Intensive Use sites, will have minimal impacts on wildlife values, particularly in comparison to significant impacts arising from the activities of the numerous non – guided BC resident and non- resident hunters, as well as poachers. AAI's presence in the area will help increase wildlife numbers by documenting, photographing, reporting and deterring poaching activities, illegal off road vehicle use and other illegal activities that have long been happening in this area and largely unchecked.

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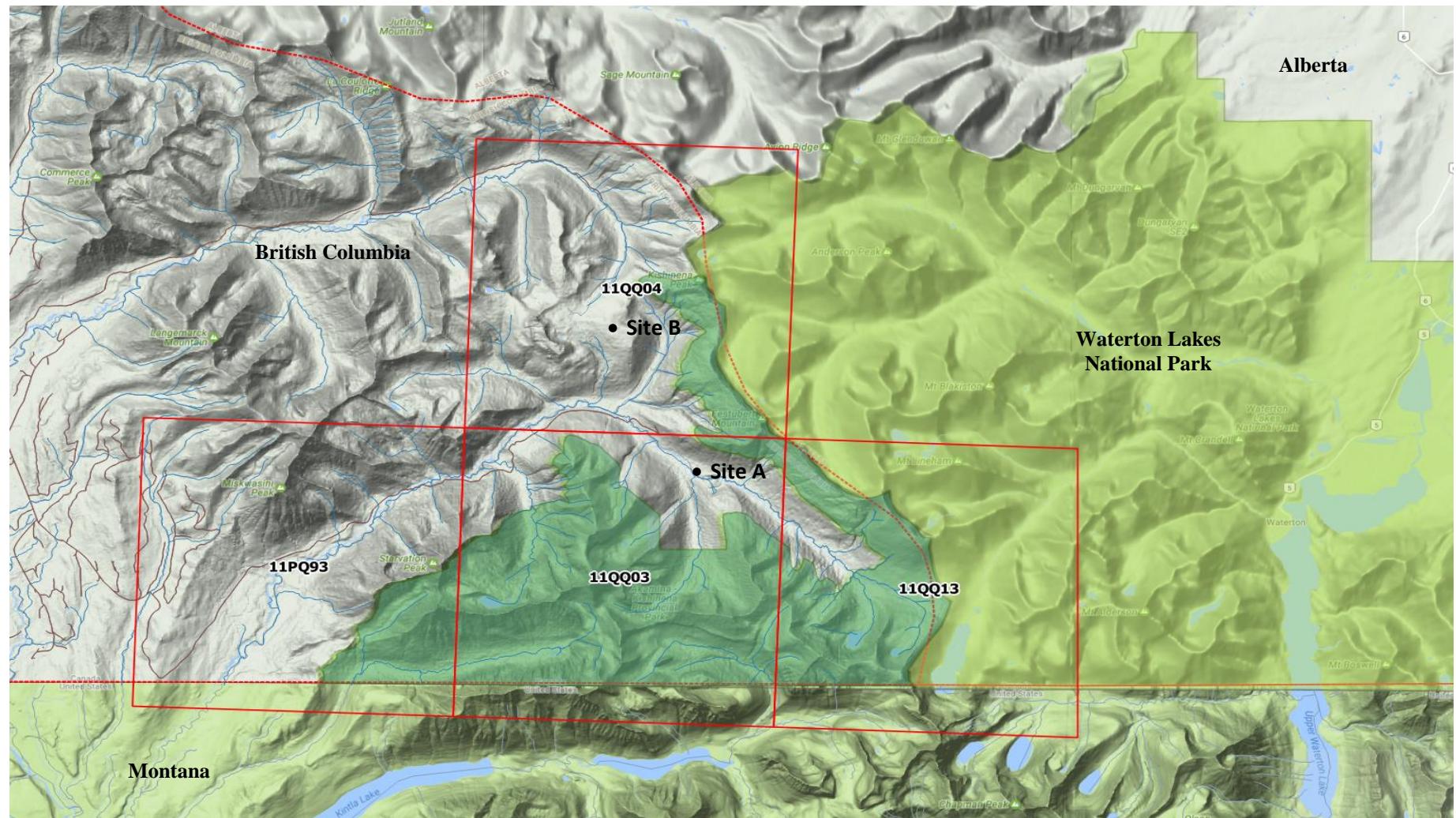
Appendix A.

Table 2: Bird species detected by the BC Breeding Bird Atlas (Davidson et al. 2015) in atlas squares overlaying the proposed project area and its local access. Probability of breeding is not included here, but all birds were observed in suitable breeding habitat during the breeding season so should be considered at least potential breeders. See Figure 1 for location of Breeding Bird Atlas squares. Birds may have been detected anywhere within these squares.

Species	BC Breeding Bird Atlas Square			
	11PQ93	11QQ03	11QQ04	11QQ13
American Dipper		✓	✓	✓
American Pipit				✓
American Robin	✓		✓	✓
American Three-toed Woodpecker				✓
Barrow's Goldeneye				✓
Boreal Chickadee				✓
Cassin's Finch		✓		
Cassin's Vireo		✓		
Chipping Sparrow	✓	✓		✓
Clark's Nutcracker			✓	✓
Common Raven	✓			
Cooper's Hawk	✓			✓
Dark-eyed Junco	✓		✓	✓
Dusky Flycatcher	✓			
Dusky Grouse	✓			
Fox Sparrow				✓
Golden-crowned Kinglet	✓	✓	✓	✓
Gray Jay	✓		✓	✓
Gray-crowned Rosy-Finch				✓
Hammond's Flycatcher	✓		✓	
Harlequin Duck	✓		✓	
Hermit Thrush	✓	✓	✓	✓
Lincoln's Sparrow				✓
MacGillivray's Warbler	✓	✓	✓	✓
Mountain Bluebird	✓			
Mountain Chickadee	✓			✓
Northern Flicker	✓			✓
Northern Waterthrush			✓	
Olive-sided Flycatcher	✓		✓	✓
Orange-crowned Warbler	✓		✓	✓
Pacific Wren				✓
Pileated Woodpecker	✓			
Pine Grosbeak				✓

Species	BC Breeding Bird Atlas Square			
	11PQ93	11QQ03	11QQ04	11QQ13
Pine Siskin	✓		✓	✓
Red Crossbill	✓			✓
Red-breasted Nuthatch	✓			✓
Red-naped Sapsucker	✓			
Red-tailed Hawk	✓			
Ruby-crowned Kinglet	✓			✓
Ruffed Grouse	✓			
Rufous Hummingbird	✓	✓		
Spotted Sandpiper	✓		✓	✓
Spruce Grouse	✓			✓
Steller's Jay	✓	✓		✓
Swainson's Thrush	✓	✓	✓	✓
Townsend's Warbler	✓	✓	✓	✓
Tree Swallow			✓	
Varied Thrush	✓			✓
Vaux's Swift	✓			
Violet-green Swallow			✓	
Warbling Vireo	✓	✓	✓	
Western Screech-Owl	✓			
Western Tanager	✓			
White-crowned Sparrow	✓			✓
White-tailed Ptarmigan				✓
White-winged Crossbill		✓		✓
Willow Flycatcher	✓			
Wilson's Warbler	✓	✓	✓	✓
Yellow-rumped Warbler	✓		✓	✓
Total Species	40	12	22	39

Figure 1: Distribution and extent of BC Breeding Bird Atlas squares (10km x 10km) with results referenced in Table 2. Locations of proposed Intensive Use sites (Site A & B) are approximate. Only areas within British Columbia portion of these squares were surveyed and survey effort was not spread equally among or within squares.



9.0 FIRST NATIONS VALUES AND INTERESTS

AAI's proposal lies within the asserted Traditional Territories of Ktunaxa Nation Council (KNC). The Kishinena drainage holds significant cultural values to the KNC as the Kishinena and Akamina valleys provided historic access to two major passes over the continental divide used frequently by Ktunaxa to access bison hunting grounds on the prairies to the east. Known as the Buffalo Cow Trail, this includes South Kootenay Pass (headwaters of Kishinena Creek) and Akamina Pass (headwaters of Akamina Creek, which is the boundary between Waterton National Park and Akamina – Kishinena Provincial Park). An important historic campground (Little Prairie) is sited approximately 2 km west of the confluence of the Kishinena and Akamina Creeks (approximately 4.5 kms west of the proposed Intensive Use Site A). Culturally significant forest areas (CCVF) have also been identified through forestry certification in the area including the Little Prairie campground and Buffalo Cow Trail, as well as high value huckleberry areas and areas of other high values.

The company appreciates that their activities may impact existing KNC rights, title, interests and values, and to that end, the company is interested in working with the KNC through a cooperative sense of sharing. The company appreciates its use of the land is not exclusive and is keen to work in a manner that benefits all parties that have an interest in this land.

AAI recognizes the KNC is interested in opportunities arising from tourism and recreation developments within their Traditional Territory, and remains open and willing to develop protocols and agreements for communication, problem solving, employment, joint business development and emergency services to outline how those opportunities can be implemented in an effective and meaningful way.

As AAI grows, the company will continue to operate on the basis of respect for the KNC Aboriginal Title and Rights with a goal of developing beneficial relationships with their communities.

10.0 BUSINESS / MARKETING PLAN

A majority of AA clients will be visitors from Waterton National Park. Annual visitors to Waterton are in the range of 325,000 to 375,000. Many visitors to Waterton express their disappointment with the lack of activities there and express their desire to participate in new adventures, provided they are in close proximity to Waterton.

Waymarker Hospitality is one of the largest hospitality service providers in Waterton, and owns and manages 4 hotels (1 is presently being rebuilt) and several restaurants and provides services for over 30,000 patrons each year in Waterton alone. In addition, Waymarker has thousands of other customers from their other hospitality venues which are a source of potential customers for the AAI. Most of Waymarker's Waterton clientele originate from Edmonton, Red Deer and Calgary and are not aware of the close proximity of the recreational opportunities within BC (AK Park and adjacent Crown land) or have ever visited it.

Waymarker's guests are generally physically fit "outdoors type" of people and have chosen Waterton to avoid the "hustle and bustle" of Jasper or Banff. Waymarker guests would receive direct marketing with information sessions to explain the tours, pricing and registration details. Waterton residents would not be the focus of AAI's marketing efforts given the Park's status and the lack of local radio, TV, newspaper, or similar advertising venues. This "closed system" gives AAI a unique marketing advantage.

Waymarker has a proven track record of marketing for these types of activities and venues. One noted example is the Waterton Triple Crown Challenge which was initiated several years ago. This challenge consists of 3 world-class hikes (Crypt Lake, Alderson-Carthew in Waterton and the Akamina Ridge located above Wall Lake and beyond in the Akamina-Kishinena Provincial Park). Hikers who successfully complete this challenge get their name registered and receive a free T-shirt (this is coordinated through Pearl's Pantry, one of Waymarker's restaurants located in Waterton).

Historically the Akamina Ridge hike saw relatively few visitors each year notwithstanding the thousands of tourists who drove "right by the trail head" on their way to Cameron Lake. After the challenge was incorporated into Waymarker's marketing program, the "word" quickly spread and the number of guests visiting the Akamina region increased substantially. Waymarker's marketing manager has already developed a similar themed approach for AAI's adventure tourism initiatives and the company is confident it will see a high level of marketing success. The adventure/eco-tours will be "high service, low volume" and marketed directly to the upper-income segment of our existing clientele.

For year one, AAI will limit the total number of clients to approximately 290 people. Year two and beyond, AAI will expand as detailed in the pro-forma projections contained in Section.5.1.

Principals of AAI have planned for a total investment of \$1.6M for this project and have the necessary cash resources available. Possible cost over-runs given uncertainties in weather, transportation and otherwise are anticipated and will be funded as required.

11.0 ECONOMIC BENEFITS

AAI will employ 10 staff including tours guides and operation of the lodges and cabins. .

AAI will buy local goods and services wherever possible. It is also creates local economic activity by hiring and training from within the local employment pool and promotes complementary local businesses and services.

AAI is committed to conducting business in a manner that demonstrates high ethical standards and efforts to be a good corporate citizen. By working with government agencies, local economic development organizations, and other tourism operators, the company seeks to ensure that its operations will be sustainable for the long term.