

ENVIRONMENTAL & TURF SERVICES, INC.

11141 Georgia Avenue, Suite 208
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July 7, 2008

Sheree Sonfield
Bsmt 1970 Plewman Way
Rossland, BC
VOG 1Y0
Canada

Re: Watersheds and Proposed Red
Mountain Golf Course

Dear Ms. Sonfield:

You asked me a question about watersheds in the evening portion of the June 24 Red Mountain workshop, and clarified your question in an email the next day. Just after the workshop concluded, Will Koop of the BC Tap Water Alliance discussed your question with me, and I committed to respond to both of you. That is the purpose of this letter.

Please note that, as I explained in my June 26 email to you, I am responding to you directly because I made that commitment. However, please direct all future questions to Red Mountain Ventures, who will work with the City to develop responses to all relevant questions/comments. Presumably, my firm will support that process for questions within our areas of expertise.

The Question

Your original, verbal question was, 'whether we are aware of golf courses in BC watersheds'. My initial answer was that I could not address BC golf courses in watersheds, but almost every one of the major golf course projects we have assisted have been in a watershed. The focus in each of these watersheds has been humans (drinking water) and/or aquatic organisms. Subsequently, you clarified your question as follows:

I'd like to know if there are any golf courses in DESIGNATED COMMUNITY DRINKING WATERSHEDS in British Columbia. Not "general watersheds", but DESIGNATED COMMUNITY DRINKING WATERSHEDS which are sources of drinking water for a community as is the Topping Creek watershed.

I understand that the proposed RMV golf course and resort would be the first golf course in such a watershed in BC. Rossland would therefore set quite a precedent and be the

first community in the Province to approve development of a golf course and resort in its designated community drinking watershed.

I would really appreciate your clarification, and I thank you sincerely, in advance, for a reply.

Thank you for clarifying your question, and for doing so in a respectful manner. After I provide the context, below, I provide the answer.

The Context

Project Context. The citizens of Rossland are concerned about the potential impact of the golf course on drinking water quality. We plan to conduct a water quality risk assessment to assess this potential impact, with a focus on pesticides and fertilizers. The results of the risk assessment will inform our Integrated Golf Course Management Plan[®], as well as the design of Best Management Practices (BMPs), and possibly the golf course design, for water quality protection. We also plan to submit for review a water quality monitoring protocol.

Parallel to these efforts, you and your fellow citizens are concerned that this project is setting a precedent for locating a golf course in a BC drinking water watershed.

BC Context. The term you used, “designated community drinking watersheds” has limited regulatory applicability. It denotes largely rural, forestry and range land pursuant to the Forest and Range Practices Act (FRPA), which superseded the Forest Practices Code in 2004. This aspect of the FRPA is designed to establish water quality objectives and guidelines downstream of logging and pasture. The purpose of this regulatory program is to control pollution from logging and pasture activities.

These logging and/or range populated watersheds must meet the following criteria in order to receive this designation:

- A successful citizens petition/request;
- Greater than 50 percent of the watershed area in Crown Land;
- A drinking water license to be held by the community; and
- The drainage area must be less than 500 km².

None of these criteria are directly related to watershed sensitivity.

For various socioeconomic and esthetic reasons, golf courses are usually not located in areas with heavy logging and cattle grazing activities. Therefore focusing on these watersheds is a bit of a ‘red herring’.

However, below I respond to your specific question, and then follow it up with a broader answer more appropriate for the context, i.e., drinking water watersheds, regardless of the surrounding land uses (logging/pasture or not).

Results and Discussion of a Brief Survey

FRPA BC Watersheds. We are aware of no existing golf courses in FRPA-designated watersheds. However, we understand that there are applications for two other golf courses pending in two other such watersheds, Coldstream Creek (Okanagan Regional District and the Coldstream District) and Trout Creek near Summerland on the west side of Okanagan Lake.

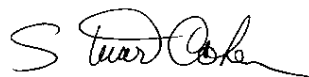
BC Drinking Water Watersheds. There are almost 4,000 public water supply systems in the Province (<http://www.health.gov.bc.ca/pho/pdf/WaterReport.pdf>). A majority of these drinking water systems are not in the FRPA-designated “community watersheds” (B. Boettger, Ministry of Health, Victoria, personal communication) . With a few hours of effort, we located 118 golf courses in BC watersheds that provide water for drinking water and/or salmon, **at least 39 of which drain to drinking water sources (they are in drinking water watersheds)**. These are summarized in the attached table. [Note: Many of the Fraser River Basin courses are also in drinking water watersheds, but they are not included in the count of 39.]

US Golf Courses. The table includes a few representative US golf courses as well. We arbitrarily chose to list 19 of them, 17 of which are in drinking water watersheds, based on our familiarity with the sites and/or water quality monitoring results.

In summary, the Forest and Range Practices Act designation for community water supply watersheds is a bit of a ‘red herring’ in this context, and it is only indirectly relevant. There are two other golf courses proposed for such BC watersheds, however. We have presented dozens of examples of golf courses in BC and US drinking water watersheds, as well as additional examples in watersheds with sensitive fish populations.

We hope this answers your question. We also invite you to continue to participate in the public review process.

Sincerely,



Stuart Z. Cohen, Ph.D., CGWP
President

Attachment

cc: Red Mountain Ventures
Mayor Gordon Smith
Rossland City Council
Will Koop