APPENDIX 20-B

Visual Quality Assessment

RED MOUNTAIN UNDERGROUND GOLD PROJECT
VOLUME 8 | APPENDIX 20-B
VISUAL QUALITY ASSESSMENT

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1 INTRODUCTION

This report presents a desk-based visual quality assessment of IDM Mining Ltd.'s proposed Red Mountain Underground Gold Project (the Project). The purpose of the assessment is to consider the effects of developing the Project and its associated infrastructure on the existing visual landscape. The assessment considers the potential effect of the Project on the scenic values enjoyed by various commercial and recreational land users in the area.

For the purposes of the Application/EIS, Visual Quality is identified as an intermediate component (IC) that is a pathway effect of the valued component (VC) Recreational Values. The potential effect of the Project on Recreational Values is assessed in Chapter 20 (Social Effects Assessment). Recreational Values and, therefore, Visual Quality is also relevant to the commercial recreation license and guide outfitter license. Both of these tenures, which support tourism-based businesses, overlap the Project area and are assessed under the VC Contemporary Land and Resource Use in Chapter 19 (Economic Effects Assessment).

This Visual Quality Assessment has also been considered in the assessment of potential Project effects on Current Use of Lands and Resources for Traditional Purposes (CULRTP) under Chapter 20 (Social Effects Assessment) and on Cultural and Heritage Resources under Chapter 21 (Heritage Effects Assessment) as a potential pathway for changes to the value of the Bitter Creek valley.

2 REGULATORY AND POLICY SETTING

Issues related to the management of Visual Quality in the context of resource development in British Columbia are generally the purview of the Ministry of Forest Lands and Natural Resource Operations (FLNRO) under the authority of the *Forest Practices Code of British Columbia Act,* Operational Planning Regulation, Section 37(1)(a), and Forest Road Regulation, Section 4(7). This assessment is guided by visual quality objectives described in the Nass South Sustainable Resource Management Plan (NSSRMP; FLNRO 2012).

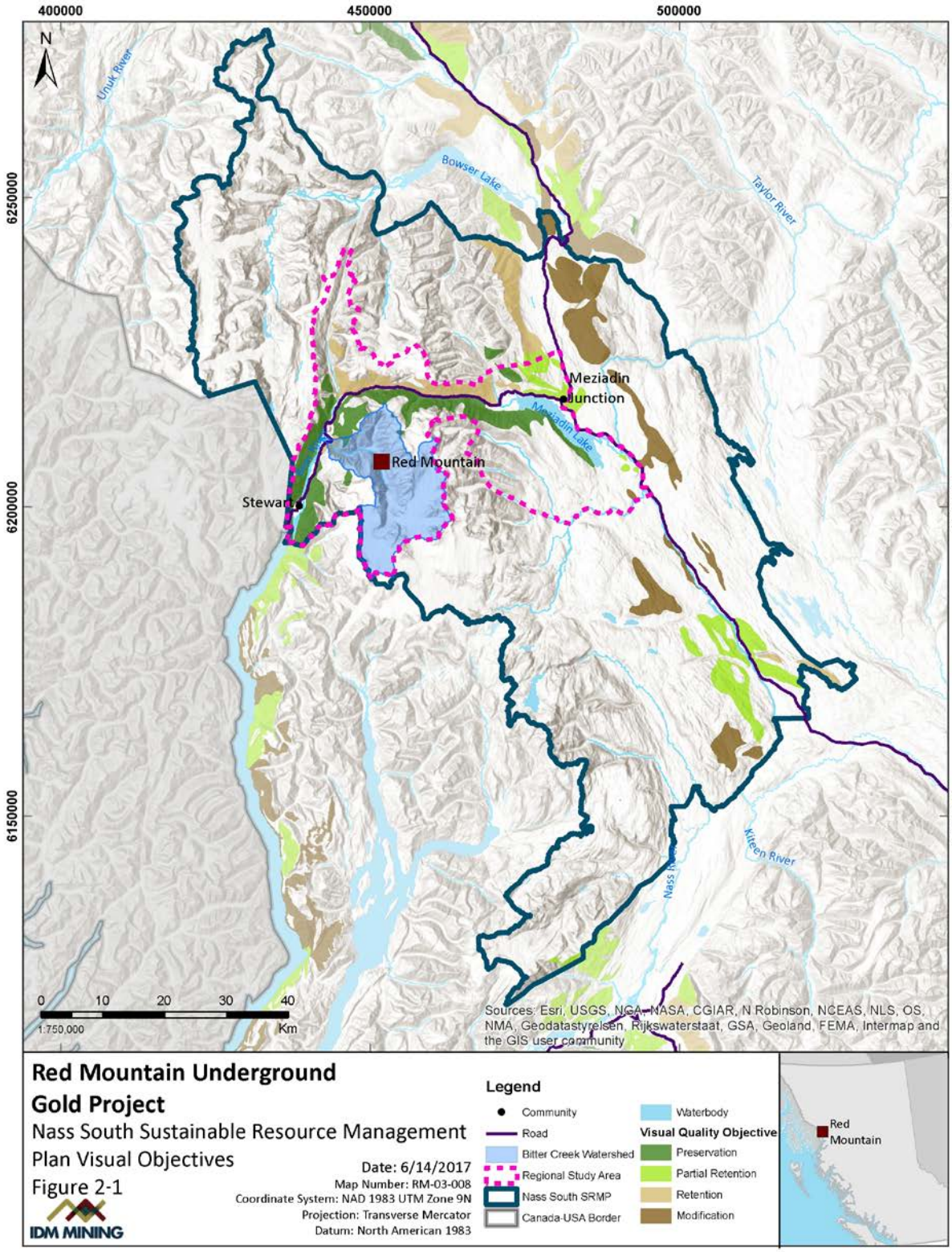
Visual Quality is a resource value that is considered in the management of forest resources in BC alongside numerous other values, such as biodiversity or riparian zone protection. The NSSRMP has established Visual Quality Objectives (VQOs) meant to reflect a desired level of visual quality based on a combination of physical characteristics and social concern for an area (FLNRO 2001). There are five categories of VQO: preservation, retention, partial retention, modification and maximum modification (FLNRO 2001; FLNRO 2012).

2.1 Nass South SRMP

The NSSRMP is the primary landscape level plan for the southern portion of the Nass Timber Supply Area (TSA). The objective of the NSSRMP is to conserve cultural and environmental resources in the region and simultaneously provide for sustainable development of regional natural resources. Specific goals of the plan are to develop "general and/or site specific objectives, measures and targets to direct timber harvesting operations, while maintaining the range of cultural, environmental and economic values in the plan area," (FLNRO 2012: 1).

The plan has five primary objectives that centre on working closely with Gitanyow First Nation and Nisga'a Nation on issues related to improved collaboration and consultation, strategic land use planning, and sustainable development across all natural resource sectors (e.g., forestry, fisheries, tourism, and mining). Figure 2.1-1 shows the area encompassed by the NSSRMP with VQOs.

Figure 2-1: Nass South Sustainable Resources Management Plan



3 SCOPE OF THE ASSESSMENT

The scope of this Visual Quality Assessment considers alterations to the landscape caused by Project activities or components, including the re-development and extension of the Access Road along Bitter Creek. The assessment encompasses the entire Bitter Creek watershed from the mouth of Bitter Creek at the Bromley Glacier to its intersection with Bear River where it is crossed by Highway 37A.

3.1 Input from Consultation

IDM has not received any comments or feedback on Visual Quality during its consultation with provincial and federal regulators, Nisga'a Nation (as represented by Nisga'a Lisims Government), community members, or stakeholders.

Early in the Pre-Application phase of the provincial environmental assessment process, members of the Working Group co-lead by the BC Environmental Assessment Office (EAO) and the Canadian Environmental Assessment Agency (the Agency) identified outdoor recreation as an important activity and resource in the area around Stewart and along the Bear River valley that was important to all regional stakeholders. Recreational Values was identified as a VC and, subsequently, Visual Quality was defined as an IC for the purpose of the Application/EIS.[1]

3.2 Methodology

After preliminary assessment of the nature and extent of visual disturbances to the landscape, the level and timing of recreational use of the Bitter Creek valley, and established land and resource use and planning objectives in the NSSRMP, it was concluded that visual modeling was not necessary for the purposes of this Visual Quality Assessment as it would not affect the outcome or conclusions of the assessment. Instead, a desktop study was undertaken using available information and professional judgment. This assessment is based on review of the NSSRMP and other publicly available spatial data (e.g., iMap BC) and supplemented by information from interviews with key informants, which were conducted during socio-economic fieldwork in November 2016. Using maps and other spatial data, the location and alignment of Project infrastructure and components were assessed in relation to known recreational features and sites or areas with identified VQOs (see Figure 3.3-1).

This assessment considers how alterations to view-scapes and other visible changes to the landscape might affect Recreational Values or otherwise effect the recreational experience. The assessment takes into account where and how recreational users might encounter or see Project components or activities and considers what effect this might have on the visual quality of their experience. The chapter is linked to Chapter 20 (Social Effects Assessment) where effects on Recreational Values are evaluated, and to Chapter 19 (Economic Effects

[1] For a full discussion of VCs and ICs, see Volume 3, Chapter 6: Methodology.

Assessment) because of the interaction between Visual Quality and Contemporary Land and Resource Use.

This assessment is also linked to section 20.10 of Chapter 20 (CULRTP) as changes to the Visual Quality of the Bitter Creek valley may have effects on the cultural value of the valley.

3.3 Assessment Boundaries

The local study area (LSA) for this Visual Quality Assessment is the Bitter Creek valley. A regional study area (RSA) is defined for the potential cumulative effects assessment in Section 8.

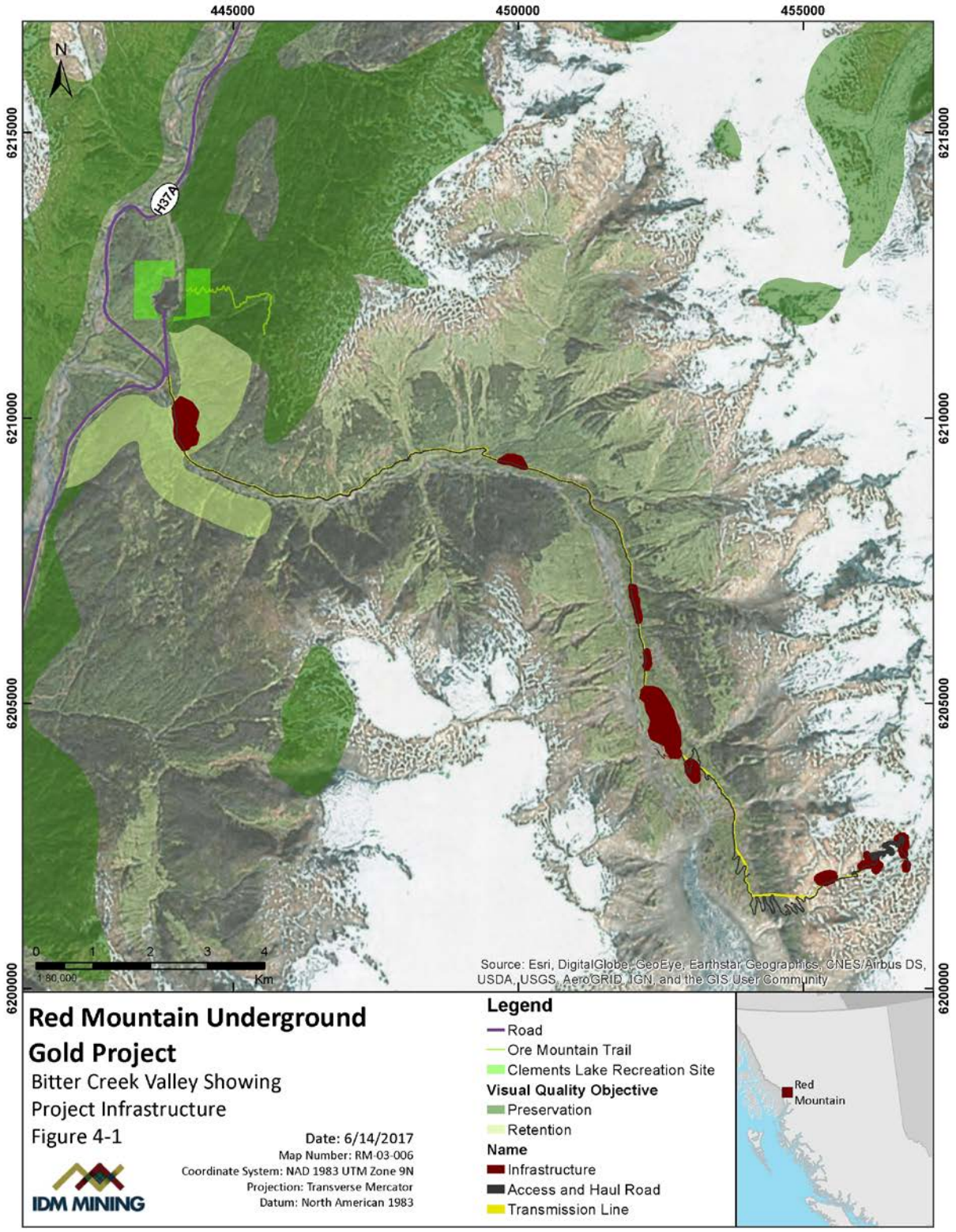
The Visual Quality Assessment considers Project effects on Visual Quality during the Construction, Operation, and Closure and Reclamation Phases of the Project.

4 EXISTING CONDITIONS

The Bitter Creek valley is a steep-sided, mountainous valley that is heavily forested in the lower and middle reaches, gradually giving way to a treeless, alpine landscape, and dominated by glaciers in the higher regions. A decommissioned road runs parallel to Bitter Creek on its northern bank from the Bitter Creek Bridge at Highway 37A to a point about halfway up the valley at kilometer 12.7. The road was originally built around the 1940s to service small mines at Roosevelt Creek and Hartley Gulch. Later it provided access for logging operations in the Bitter Creek valley in the 1950-60s. In 1994, Lac Minerals extended the road to just short of the Bromley Humps area to support exploration and baseline environmental assessment studies (R. McLeod, pers. comm. 2017).

Although large portions of the valley are unaltered, there is evidence of past and current mining and mine exploration activities in several places, including those areas currently being used for mine exploration and planned for future development of the Project. Figure 4-1 illustrates proposed Project component and activity locations.

Figure 4-1: Project Infrastructure in the Bitter Creek Valley



The NSSRMP designates VQOs along almost the entire Highway 37A corridor (from Stewart to Meziadin Lake) as a mix of "preservation" and "retention", the two highest and most rarely used VQO categories in the province. The VQO for the area at the intersection of Bitter Creek and the Bear River is designated for *retention*, which is generally defined as: "activities are not visually evident" (FLNRO 2001). A retention designation permits only up to 1.5% of existing view-scape from a perspective view (i.e., ground-level point of view) to be altered. The Access Road is considered an existing feature and does not enter the calculation of alteration (FLNRO, pers. comm. 2017).

Current recreational use of the Bitter Creek valley is limited due to rugged terrain and limited access. The existing Access Road, including the bridge at Hartley Gulch, was decommissioned in the mid- to late-nineties. The Ore Mountain hiking trail leaves from the small recreational area at Clements Lake, which is approximately half a kilometer north of Bitter Creek. The trail is a steep, four kilometer hike to a view point overlooking the Bear valley and, about a kilometer farther along, a small alpine lake marks the endpoint of the hike. Bitter Creek is not visible from this hiking trail.

Other known recreational users of the Bitter Creek valley include trappers, guide outfitters, and heli-skiers. See Appendix 20-A (Socio-Economic Baseline Report) for more details.

5 POTENTIAL EFFECTS

Visual Quality is an important aspect of outdoor recreation in the Stewart and Bear River valley area. The underlying assumption about the potential effect of Project activities and components on Visual Quality is that quality is a function of the naturalness of the landscape. Furthermore, it is assumed that human activity, especially in the context of a relatively untouched, wilderness area such as the Bitter Creek valley, will detract from or adversely affect Visual Quality.[2] The Project's area of influence where effects to Visual Quality might occur is restricted to the Bitter Creek valley and adjacent areas from where Project components or activities might be observed.

5.1 Project Interactions

The modes and locations from where Project components and activities might be observed, and thus where the Project interacts with Visual Quality (see Table 5.1-1), include:

- Re-developments at the entrance to the Bitter Creek valley, including the Access Road and Powerline, which may interact with the public traveling along Highway 37A and those exiting the highway to visit the Clements Lake Recreational Area and the Ore Mountain trailhead;

- Project infrastructure, components, and activities farther up the valley that will be visible to heli-skiers and possibly to hunters on guided hunting trips with Nisga'a Guide Outfitters (NGO); and

- Trappers, hikers, resident hunters, and others that might use the Ore Mountain hiking trail to access the peak of Ore Mountain, from where it may be possible to see Project components and activities in the distance.

The interaction between recreationists and the entrance to the Access Road will be limited. For those traveling along Highway 37A, the visual effect will be fleeting as the entrance occurs near a large hairpin bend in the road: motorists will come upon the Access Road and Powerline quickly and they will not remain in the motorists' line of sight for more than a few seconds.

Recreationists accessing the Clements Lake Recreation Area and the Ore Mountain trailhead will potentially see the Access Road and Powerline up-close as they turn off the highway or shortly thereafter. From the current highway turnoff, Clements Lake lies in the opposite direction to Bitter Creek. Once visitors make the turn towards Clements Lake, the Access Road and Powerline will soon be out of sight.

Users of Clements Lake and the Ore Mountain hiking trail will not be able to see the Access Road or any other Project components.

[2] It is presumed that these assumptions reflect widely held societal values.

Resident hunters are not known to access the Bitter Creek valley to any great extent (D. Green. Pers Comm. 2016). While the re-opening of the Access Road may entice resident hunters to increase their use of the area, it will be an active industrial road that will be gated with and have restricted access. Very few, if any, resident hunters will see Project components farther up the valley because of their remote location.

Non-resident hunters could potentially access the Bitter Creek valley on guided hunting trips with NGO. The NGO guide outfitting license is very large and encompasses numerous productive hunting areas that are more accessible than the Bitter Creek valley. Bitter Creek was traditionally used quite sparingly by the previous owner of the license, but the area has a healthy population of Mountain Goat, which both the previous and current license holders identified as important to their operation (R. Milligan, pers. comm. 2016). It is possible that non-resident hunters will see parts of the Access Road, Powerline, and various Project facilities and components if they choose to hunt in the Bitter Creek valley. This will likely detract from their experience as it is assumed that part of the experience of hunting in the backcountry is to be in a natural wilderness setting, remote from human developments. Non-resident hunters would be especially affected because they are likely to have come to this part of BC precisely because of its reputation as a remote and pristine wilderness area.

The heli-skiing experience will also be affected from a visual standpoint by the development of Project components and infrastructure. In interviews with a representative of the heli-skiing license holder in the region, the upper reaches of the Bitter Creek valley offer several prime ski runs that are notable for their ski-ability when weather conditions make other parts of the license area unsafe to ski (C. Umpleby. Pers Comm. 2016). Heli-skiers are likely to be able to see certain parts of Project components and infrastructure either from the helicopter or on certain, limited, ski runs. In general the Project components will be in the distance; some components will be buried by snow and in many respects not visible to the naked eye. Nevertheless, during field interviews the heli-ski operator noted that mining development in general, especially mine exploration camps, have dramatically increased in the past twenty years throughout much of the license area. He noted that his clients, many of whom come from Europe, have noticed the change. To the degree that heli-skiers are seeking and expecting a pristine mountain landscape, the Project will detract from this experience.

Table 5.1-1: Potential Project Interactions: Visual Quality

Project Component or Activity	Valued Components / Intermediate Components	Potential Effect / Pathway of Interaction with <VC / IC>
Access Road Powerline Mine site Tailings Management Facility (TMF) Process Plant	Visual Quality as an IC of the Social VC Recreational Values	Project infrastructure, components, and activities in the Bitter Creek valley will be visible to heli-skiers, possibly to hunters on guided hunting trips with NGO, and to other backcountry users

Project Component or Activity	Valued Components / Intermediate Components	Potential Effect / Pathway of Interaction with <VC / IC>
Access Road Powerline	Visual Quality as an IC of the Social VC Recreational Values	Re-developments at the entrance to the Bitter Creek valley, including the Access Road and Powerline, which may interact with the public traveling along Highway 37A and those exiting the highway to visit the Clements Lake Recreational Area and the Ore Mountain trailhead.

5.2 Discussion of Potential Effects

The potential effect on Visual Quality is ultimately a matter of subjective opinion of the observer. For example, one member of the public might see even the slightest change in the near pristine wilderness landscape around Stewart as a significant effect on the visual landscape, while another might just as easily see an active mine access road as a sign that a new source of employment and economic opportunity had returned to the area.

Alternatively, heli-skiers from Europe may see the increase in activity, especially mining exploration camps, hydroelectric developments, and resource access roads, as taking away from the visual quality of their experience. Yet the experience is still far, far more remote and untouched by the hand of humans than most of the areas they might usually ski in their home countries in Europe.

Context is important because the potential effects are limited in scope and scale compared to the landscape in which they are situated. Although, as noted, for some this would be offset by the fact that the effect to visual quality is occurring in an otherwise pristine setting. From a temporal perspective, the effects on visual quality are fleeting to the individual observer but permanent in the context of the environmental change that has taken place.

6 MITIGATION MEASURES

There is little that can be done to eliminate the visual effect of land clearing and construction. The Access Road, buildings, the Powerline, and other Project components have a physical presence on the land; they will be visible if they are in someone's line of sight.

Some measures that can be taken to reduce the effect on Visual Quality for backcountry users and recreationists in the Bitter Creek valley include measures to retain existing vegetation wherever possible to screen Project components from view. To a certain extent, embankments disturbed for road construction will green up over time as will the right of way for the Powerline.

For those traveling along Highway 37A or venturing to the Clements Lake Recreation Area or the Ore Mountain trailhead, the visual effect of the Access Road will similarly be difficult to mitigate for anyone that ventures up to the gate. It will appear much as countless other logging roads and mine access roads do around the province: relatively unobtrusive, but undeniably a resource road.

Careful alignment of the Access Road entrance so as to conceal it from Highway 37A users and those on their way to Clements Lake could substantially mitigate the visual effect of the Access Road entrance, although the available options will be limited by site conditions and topography. The options to mitigate the visual effect of the Powerline, especially near the intersection with Highway 37A, are much more limited. In all likelihood, the location of the towers and the right of way will be dictated by factors other than consideration of its visual effect on the recreational experience of tourists, outdoor enthusiasts, and the public. Similar to road embankments, natural or assisted green-up of freshly cut areas will help them blend more readily into the surrounding landscape, reducing the visual effect.

Table 6.1-1 summarizes the potential effects to Visual Quality in terms of the proposed mitigation measures and their anticipated effectiveness and identifies the residual effects that will be carried forward for further assessment.

6.1 Environmental Management and Monitoring Plans

There are no management or monitoring plans being developed to specifically address the effects of the Project on Visual Quality. Recreational Values are partially addressed in Chapter 29.3 (Access Management Plan).

Table 6.1-1: Proposed Mitigation Measures and Their Effectiveness

Potential Effect	Valued Components/ Intermediate Components	Applicable Phase(s)	Mitigation Measures	Effectiveness (Low/Moderate/High /Unknown)	Residual Effect (Y/N)
Reduced visual quality for backcountry users	Visual Quality as an IC of the Social VC Recreational Values	Construction Operation Closure and Reclamation	Retain screening vegetation where feasible.	Low to Moderate, depending on specific location	Yes
Reduced visual quality for users of Clements Lake Recreation Area and Ore Mountain hiking trail	Visual Quality as an IC of the Social VC Recreational Values	Construction Operation Closure and Reclamation	Align Access Road and Powerline so as to reduce visibility from Hwy 37A. Retain screening vegetation where feasible.	Low to Moderate	Yes

7 RESIDUAL EFFECTS CHARACTERIZATION

7.1 Method

The assessment considers how alterations to view-scapes and other visible changes to the landscape might affect Visual Quality as it relates to Recreational Values, a VC under the Social pillar. The analysis of residual effects on Visual Quality takes into account where and how recreational users might encounter or see Project components or activities and considers what effect this might have on the visual quality of their experience.

The analysis is mostly a subjective exercise based on a combination of professional judgment, standard practice, and experience (including research) with input from consultation and social baseline field research and reference to the NSSRMP.

The residual effects of the Project on Visual Quality are characterized by the application of a number of descriptive criteria (Table 7.2-1) along with consideration of the likelihood of the effect occurring. These criteria are typically considered in their totality to make a judgment as to the significance of the residual effect. A determination of significance is not made for Visual Quality because it is considered an IC for the purposes of this Application/EIS. The results of this Visual Quality Assessment are carried forward for consideration in the determination of significance of residual effects for the VCs Recreational Values in Chapter 20 (Social Effects Assessment), CULRTP in Chapter 20, and Contemporary Land and Resource Use in Chapter 19 (Economic Effects Assessment).

7.2 Residual Effects Analysis

Table 7.2-1: Characterization of Residual Effects

Characterization of Effects on Visual Quality			
Criteria	**Definition**	**Entrance[1]**	**Valley[2]**
Magnitude	A relative statement of the severity (e.g., size, extent, and/or importance) of the effect.	Moderate	Low Project components and activities will generally be in the medium to far distance, and partially concealed by snow in winter.
Geographic Extent	The spatial dimension(s) of the effect.	Moderate Most cleared areas will not exceed approximately 50 m in width.	Moderate

Characterization of Effects on Visual Quality			
Criteria	**Definition**	**Entrance[1]**	**Valley[2]**
Duration	The temporal dimension of the effect.	Approximately 13 years Remnants of the Access Road and Powerline will likely be visible for decades.	Approximately 13 years Remnants of the Access Road and Powerline will likely be visible for decades.
Frequency	Refers to whether the effect is intermittent or continuous.	Continuous	Continuous
Reversibility	Refers to whether or not the effect can be undone (i.e., a statement of its permanence).	Partially	Partially
Context	Remote valley with some previous development, but generally perceived as pristine wilderness unaltered by human activity.	There is evidence of previous human activity in the Bitter Creek valley, especially the road to Clements Lake Recreation Area and the old Bitter Creek access road. A recently designated Old Growth Management Area (OGMA) overlaps the area.	There is evidence of previous human activity in the Bitter Creek valley, especially the road to Clements Lake Recreation Area and the old Bitter Creek access road. A recently designated Old Growth Management Area (OGMA) overlaps the area.

[1] Entrance = Reduced visual quality for users of Clements Lake Recreation Area and Ore Mountain hiking trail due to residual effect on visual quality with respect to the entrance area to the Access Road.

[2] Valley = Reduced visual quality for back country users due to residual effect on visual quality with respect to the Access Road, Powerline, Mine site, TMF, and Process Plant.

7.2.1 Assessment of Likelihood

The effects of the Project on Visual Quality are all but inevitable because they are the result of essential developments for both construction and operation of the Project. Likelihood is therefore “high” that the stated effects will occur.

7.2.2 Analytical Assessment for Visual Quality

Considering the summary of criteria in Table 7.2-1, it is clear that the Project will have a residual effect on Visual Quality in the Bitter Creek valley. The scale of the disturbances that will cause visual effects are modest by comparison to a large cut-block in a logging operation or the flooding of a valley for a hydroelectric project. On the other hand, in the context of an otherwise pristine valley, it can be argued that the visual effects are profound for someone seeking to enjoy a wilderness experience. In fact, the valley is not pristine and has seen both logging and mining activity in the past, although many of these earlier developments have

been at least partially reclaimed by nature. Finally, the intensity of outdoor recreation in the area around Stewart and along the Bear valley is not at the same scale as elsewhere in BC due to relatively low population density and the relative remoteness from large population centres. This means that the number of recreational users affected by changes in visual quality is small compared to many other parts of the province.

It is also true that this relative isolation and low usage is an integral part of the quality of the recreational values that attract some 40,000 visitors to Stewart each year (District of Stewart 2014). Continuation of the quality of the outdoor experience contributes to the value of tourism in Stewart in general and for commercial tenure holders, such as guide outfitting and heli-skiing. Alterations to the visual landscape resulting from the Project are small compared to other forms of resource development (e.g., logging operations, open pit mines, or liquefied natural gas facilities) and are not likely to have an appreciable effect on Recreational Values.

7.2.3 Significance Determination

A determination of the significance of residual effects of the Project on Visual Quality is not provided because Visual Quality is considered an IC. For the purposes of this Application/EIS, a significance determination is determined for VCs only.

7.3 Potential Residual Effects Assessment

The effect of the Project on Visual Quality will be highly localized: most effects will occur in relatively remote areas, far from view, and will be on a very modest scale, especially when compared to resource development projects in many other parts of the province. As a result, the residual effects of the Project on Visual Quality and, by extension, on Recreational Values in the Bitter Creek valley are expected to be moderate and tolerable by recreational users.

Table 7.3-1: Summary of the Residual Effects Assessment

Residual Effect	Project Phase(s)	Mitigation Measures	Summary of Residual Effects Characterization Criteria *(context, magnitude, geographic extent, duration, frequency, reversibility)*	Likelihood *(High, Moderate, Low)*
Reduced visual quality for backcountry users	Construction Operation Closure and Reclamation	Retain screening vegetation where feasible.	Context: There is evidence of past human activity. Magnitude: Moderate Extent: Bitter Creek valley Duration: Approximately 13 years Frequency: Continuous Reversibility: Partially	High

Residual Effect	Project Phase(s)	Mitigation Measures	Summary of Residual Effects Characterization Criteria *(context, magnitude, geographic extent, duration, frequency, reversibility)*	Likelihood *(High, Moderate, Low)*
Reduced visual quality for users of Clements Lake Recreation Area and Ore Mountain hiking trail	Construction Operation Closure and Reclamation	Align Access Road and Powerline so as to reduce visibility from Hwy 37A. Retain screening vegetation where feasible.	Context: There is evidence of past human activity. Magnitude: Moderate Extent: Bitter Creek valley Duration: Approximately 13 years Frequency: Continuous Reversibility: Partially	High

8 CUMULATIVE EFFECTS

Cumulative effects are the result of a Project-related effect interacting with the effects of other projects or activities to produce a combined effect. Cumulative effects are assessed in each of the assessment chapters as required by EAO (2013). The method for assessing cumulative effects generally follows the same steps as the Project-specific effects assessment.

According to Agency guidance (2014) a cumulative effects assessment (CEA) is carried out where residual effects are predicted after consideration of mitigation measures, regardless of their significance. A rationale must be provided if a residual effect is not carried forward for further analysis of its cumulative effect.

In the case of the potential cumulative effects on Visual Quality, the Project does contribute to the overall burden of resource development on the visual landscape; residual effects have been identified for the Bitter Creek valley.

The need for a CEA is established by addressing two key questions:

- Is there any spatial or temporal overlap of Project-related residual effects with the effects from other past, present, or reasonably foreseeable projects or activities?

- Is there potential for Project-related residual effects to interact cumulatively with past, present, or reasonably foreseeable projects or activities.

In both cases it is expected that the residual effects of the Project on Visual Quality will overlap with other past, present, or reasonably foreseeable projects or activities and there will be some degree of interaction.

Temporally, the Project will overlap within the Bitter Creek valley with the proposed Bitter Creek Hydroelectric Project (BCHP) currently undergoing its own regulatory approval and permitting process. Spatially, the overlap of visual effects can be assessed as positive because it implies that clearing of land or other activities and components are serving a dual purpose hence lessening the cumulative effect on Visual Quality. The Access Road and Powerline, including the entrance area near Highway 37A, are likely to fall under this category.

The greater concern for cumulative Visual Quality effects occurs where there is not spatial overlap, but rather alterations to the visual landscape that are adjacent or occurring within the same study area or view-scape. It is possible that the Project and BCHP will interact cumulatively within the context of the Bitter Creek valley LSA, but only for development occurring in areas that are remote and expected to only affect the experience of backcountry users, such as hunters and heli-skiers.

The RSA for the Visual Quality CEA is the Highway 37A corridor from the District of Stewart to Meziadin Junction because this is a contiguous area for outdoor recreation. There is temporal overlap and the potential for the Project's residual Visual Quality effects to interact cumulatively with past, present, or reasonably foreseeable projects or activities in the RSA.

These potential cumulative effects are considered in Chapter 20 (Social Effects Assessment) under the full cumulative effects assessment of the VC Recreational Values because Visual Quality is considered an IC of Recreational Values. Potential cumulative effects of the Project on Visual Quality are also considered in Chapter 19 (Economic Effects Assessment) because Recreational Values are a contributing factor to the economic interests of the guide outfitting and heli-skiing tenure holders that overlap the Bitter Creek valley.

9 FOLLOW-UP PROGRAM

The purpose of the follow-up strategy is to:

- Identify measures to evaluate the accuracy of the original effects prediction;
- Identify measures to evaluate the effectiveness of proposed mitigation measures; and
- Propose a strategy to apply in the event that original predictions of effects and mitigation effectiveness are not as expected.

The follow up strategy for potential effects to Visual Quality are included with that proposed for Recreational Values, addressed in Chapter 20 (Social Effects Assessment).

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