

**Response to the Draft Terms of Reference for the Coquihalla Pass Resort Project**  
**from the Federation of Mountain Clubs of B.C..**

The FMCBC has major concerns over this project, specifically over the potential impact on recreational opportunities for our members and on our environment. We do not believe a consideration of these impacts is clearly defined by the proposed Terms of Reference.

Specific Deficiencies in the Draft Terms of Reference.

Section 5.8.2 Current Use of Land Resources

In this section there should be more than a simple discussion of recreation use in this area. Documentation and quantification of summer and winter uses such as hiking, climbing, snowshoeing and ski-touring should be made; trails and key routes should be clearly identified, the origin and type of recreationists, the reasons people are recreating in the area, and alternative destinations which can provide almost identical experiences, should all be determined. If backcountry recreationists, currently the dominant user group of the proposed resort area, are to be displaced, precisely where they are to go must be identified. If a dislocation of backcountry recreationists is to occur, which it will if the proposed resort is developed, the question of mitigation must be addressed – which area will be provided to those dislocated from the Coquihalla area? The proponents should have to demonstrate how recreationists should be compensated by making available terrain that could provide equivalent opportunities and experiences.

We believe the so called residual and cumulative environmental effects on back-country recreationists will be extremely high and will not be able to be mitigated. Since it is unlikely that the proponent could adequately compensate for these impacts, one definite alternative for this project is that it should not occur.

The Environment Assessment Office must consider this project not in isolation, but together with the other projects that would have a similar socially disruptive impact, including Garibaldi at Squamish and Melvin Ck./Cayoosh. All 3 projects affect the same people in the same region. The areas sought by these projects currently provide 1 or 2 day outdoor recreation activities to the same group of people. The proponents must address how displaced outdoor recreationists will be accommodated if 2 or 3 of the proposed ski resorts are developed.

Hydrology

For the Coquihalla proposal, identifying impacts of ground-water removal on low flows in rivers is very critical to the health and recreational enjoyment of rivers fed by water from the proposed resort area. The proponents should review historic trends as well as development scenarios which include climate change projections. The footprint of this project should be extended to at least the confluence of the Nicola with the Thompson since the Nicola has been identified as one of B.C's endangered rivers. Already there has been a history of lack of water for irrigation and the fishery in this river. Reductions in ground water and destruction of headwater marshes would exacerbate the problem.

Rationale for the Project

The real economics of this project should be honestly evaluated. The real economic gain of such projects is the windfall from land development not the revenue from skiing. A question to explore in the alternatives to the project is whether the proponent will not accrue the same or greater benefits from a project in Merritt that includes a golf course,

spa and aquatic centre, conference centre and cross-country skiing, biking and hiking opportunities. Economic losses associated with loss of recreational opportunities, replacing scarce recreation opportunities with common ones, declining visitation at downhill ski areas, contribution of such ski areas to atmospheric carbon dioxide and global warming, and loss of ecological functions, such as water flow, sewage pollution, etc., must be addressed. To date we have not seen these economic losses even partly adequately addressed in any similar development proposal submitted to the EAO.

Yours sincerely,

Sandra Nicol  
FMCBC Recreation and Conservation Chair.