



BC Parks
PO Box 9398 Stn Prov Govt
Victoria, BC V8W 9M9

October 5, 2014

Attention: Senior Parks and Protected Areas Planner

Re: Trans Mountain Pipelines Park Boundary Adjustment Application

Thank you for the opportunity to comment on the proposed Park Boundary Adjustment Application by Trans Mountain Pipelines.

Our organization, the Federation of Mountain Clubs of BC (FMCBC), is a province-wide umbrella organization of 33 outdoor recreation clubs with over 5000 individual members. For four decades we have represented the interests of non-motorized or self-propelled backcountry recreationists by maintaining or improving backcountry and wilderness experiences for our members and the public. We strongly support maintaining the ecological integrity and boundaries of our provincial parks while maintaining and improving access for non-motorized backcountry recreation.

We are concerned that the proposed boundary adjustments will negatively impact BC Parks including Finn Creek, North Thompson River, Bridal Veil Falls Provincial Parks and Lac Du Bois Grasslands Protected Area and Coquihalla Summit Recreation Area. BC Parks Mission and Mandate is the following:

- Protecting and managing for future generations a wide variety of outstanding park lands which represent the best natural features and diverse wilderness environments of the province.
- Providing province-wide opportunities for a diversity of high quality and safe outdoor recreation that is compatible with protecting the natural environment.

The proposed twining of the pipe will cause damage and harm to BC Parks by clearing vegetation, soil excavation and disturbance to watercourses. The pipeline also brings the risk of a spill which would be catastrophic for the plants, animals and human recreationalists that use the Parks. We believe that it is possible to either construct the pipeline within existing cleared roadways or within the exiting cleared pipeline right of way. In this way there will be no need to engineer new pipeline routes through undisturbed areas which otherwise might be used by motorized vehicles to access the parks. In other words, avoiding new pipeline routes will not increase the risk of motor vehicles trespassing into the parks. We believe that while it may be more expensive to complete construction avoiding any new disturbance that this expense is justified based on protecting the natural park lands.



Federation of Mountain Clubs of BC

Accessing the backcountry one step at a time

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To ensure that BC Park lands are protected and the public maintains the benefits of the parks the proponent should include at least the following provisions:

- 1) The proponent agrees not clear any vegetation except within the existing cleared right of way.
- 2) Trenchless methods should be used for pipeline construction within Parks.
- 3) Public access to the parks should be maintained at all times during construction.
- 4) The proponent agrees that should this project be transferred or sold to a new owner, the new owner agrees to the conditions expressed above, plus all other conditions of the original agreement.

We look forward to your reply relating to our comments above.

Yours sincerely,

Ben Singleton-Polster

Recreation and Conservation Committee,
Federation of Mountain Clubs of BC