



January 8, 2014

Chris Hamilton
Executive Project Director
Environmental Assessment Office

Re: Proposed Garibaldi at Squamish Resort

Dear Sir,

The Federation of Mountain Clubs of British Columbia (FMCBC) is an umbrella organization of over 30 outdoor recreation clubs having a total membership of about 4500 individual members throughout the province. For over four decades we have represented the interests of self-propelled/non-motorized backcountry recreationists by maintaining and/or improving backcountry and wilderness experiences for our members and the public.

In our opinion the revised proposal by the proponents of the Garibaldi at Squamish (GAS) Resort does not address our earlier concerns respecting winter recreation as summarised below. We wish to reiterate our concerns about additional impacts of the GAS proposal which we do not believe have been adequately considered by the EAO or by the GAS proponent. Even if these current design changes are acceptable to the EAO, the FMCBC still does not want this project to proceed due to the impact of the proposed resort on backcountry winter recreation and front country summer recreation as summarized below.

If this project proceeds, there are four highly significant likely impacts of the GAS proposal on backcountry winter recreation:

1. There will be adverse effects on non-motorized backcountry recreation in Garibaldi Provincial Park. Many of our members feel this is one of the most important wilderness parks in the province, and is one of the few large intact areas of land remaining in the lower mainland which is valuable for non-motorized backcountry winter recreation. Small strips of “undisturbed” land between the resort and the park will do nothing to protect the park and its wilderness values against the numerous human, aesthetic, and noise intrusions likely from the proposed resort. Instead we feel a very wide tract of undisturbed land at a much higher elevation than the highest terminal of the resort lifts is required to separate the resort from the park boundary. This higher elevation land would help to reduce the likelihood of skiers going “out of bounds” into the park and then requiring rescue or other assistance which could put first responders at risk. Also, this area is well known for poor visibility which would further compromise any recreation or rescue in the park. Were the resort to go ahead, we believe that the park would forever have its non-motorized recreation and wilderness values compromised. Loss of these values cannot be mitigated by the narrow strip of land between the resort and the park boundary as presently proposed.



2. There will be adverse effects on the winter backcountry sharing accord reached by different winter backcountry recreation groups, and adopted by the Sea-to-Sky LRMP, which the government has accepted. This accord zoned land for different types of backcountry recreation uses, for example Brohm Ridge, which is within the proposed GAS resort area, has become an important snowmobiling area. Snowmobilers would be displaced from this area by the proposed resort and have already been attempting to obtain a snowmobiling corridor which might impact the Park. If they were not given such a corridor, they would likely be given another area as compensation for displacement from Brohm Ridge. This would inevitably result in the loss of a non-motorized recreation area, disrupting the accord and the LRMP zoning, resulting in a further loss of non-motorized winter recreation opportunities.
3. We are concerned that the proposed GAS resort might want to expand their tenure area into Garibaldi Park in the future as we saw many years ago when the borders of Garibaldi Park were changed to accommodate Blackcomb Ski Resort expansion. More recently Whistler Blackcomb was expanded into the Flute Mountain area, thus changing forever that part of the park. We feel that these expansions of Whistler Blackcomb might be used as a precedent for GAS to expand into the Park, and this thin end of the wedge approach must be clearly blocked “in perpetuity” should the GAS project proceed.
4. Regarding summer recreation, we agree with local residents that recreation around Brohm and Cat Lakes will be severely limited by the proposed golf course part of the resort which will surround the lakes. This area supports many family summer activities such as swimming, hiking and camping which would be seriously restricted by the golf course. We note that this is a significant expansion of the resort footprint when compared with the previous plan. The resort would improve summer access as well as winter access to the western side of Garibaldi Park, and consequently there would be a large increase in summer visitors to this presently undeveloped area of the park which has no facilities to handle this increase. Decades of park’s budget restraints has caused serious deterioration of the park’s existing facilities, and in the present financial climate, installation of any new facilities in this area of the park are very unlikely. Thus, any increase in visitors to this area of the park without providing corresponding facilities would cause irreparable environmental damage to the natural environment.

We understand the new proposal is relying on water obtained from the aquifer in the vicinity of Paradise Valley to alleviate concerns regarding water use. Paradise Valley is several kilometres from the proposed resort and at a much lower elevation. The new proposal involves running the proposed water supply pipe from Paradise Valley along an existing logging road adjacent to the previously proposed resort boundary which would further expand the footprint of the resort. If this proposal goes ahead, we would like to see that any route for the water supply pipe is chosen such as to minimize its environmental impact taking into consideration the energy required for pumping and the size of the disturbed land. Running the water pipe along the main public access road as previously proposed for power lines, may be a better option.



Federation of Mountain Clubs of BC

Accessing the backcountry one step at a time

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The lower mainland is home to most of the Province's non-motorized recreationists and Garibaldi Park is a local, national, and international drawing card because of its wilderness non-motorized recreation values. The proposed GAS resort would have a major adverse impact on non-motorized recreation and the values for which Garibaldi Park has become well known, and should therefore not be allowed to proceed.

Yours sincerely,

A handwritten signature in blue ink that reads "Scott Webster". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Scott Webster,
President, FMCBC