



21 April 2015

via email: Jennie.Aikman@gov.bc.ca

Jennie Aikman  
Regional Director  
South Coast Region, BC Parks  
Ministry of Environment

Dear Ms. Aikman:

Re: BC Parks - Draft Ski Resort Policy

Thank you for this opportunity to comment on the draft Ski Resort Policy. Our members are concerned that as currently drafted, this policy will not help resolve disputes between the public and the ski resort operators in Cypress and Mount Seymour Provincial Parks.

As you know from our previous discussions and correspondence related to BC Parks' Ski Resort Policy Intentions Paper and the North Shore Ski Resorts operational problems, the FMCBC is well aware of the importance of maintaining the viability of ski operations in these parks. The winter operation of these ski resorts results in a driveable access to the high country for backcountry recreation users, as well as enhancing recreational opportunities in certain areas of the parks for those who require a more developed environment, i.e., Controlled Recreation Areas. That being said, the two fundamental responsibilities of BC Parks in a Class A Park are to protect the park's natural environments and to facilitate public access for non-commercial, non-motorized recreation. Studies have shown that these two fundamental aspects are strongly supported by the public and yet they are not clearly discernible in the present draft.

The integrity of these parks and free public access to them must not be sacrificed to ski area commercial viability. The public's desire for minimal access restrictions and minimal disturbance of its enjoyment of these parks' natural environments should not be secondary to the operators' need for reasonable profits.

We believe the following points referenced in the draft policy should be reviewed, clarified and/or revised:

1. A 60-year lease is excessively long for providing certainty to the operator. We are told that a 60-year term is typical for resorts operating on non-park Crown Land; however, these are Class A Parks, a fundamental distinction, and operators within parks should be held to a higher standard. More importantly, BC parks is in no better position today than it was 30 years ago in envisioning the nature or magnitude of changes, which may occur and which may impact the ski resorts but more importantly parks. As described in the BC Parks Ski Resort Policy Intentions Paper:

Those factors include ever increasing public interest for year-round use; the need for frequent major infrastructure investments; changes in recreational opportunities (e.g., rise in popularity of mountain biking and snowshoeing); and changes in climate affecting ski conditions.



For those same reasons, it does not make sense to extend the permit term to 60 years. Such long-term leases will make it difficult for BC Parks to respond to changes to maintain or enhance the integrity of the parks and the needs of the public. In Canadian national parks the renewable lease period is 42 years, so it is difficult to understand why the lease term in a provincial park should be almost 50% more than in a national park.

2. The draft provides for some considerable changes to existing ski resort plans relating to public use and park access, and to possible long term impacts on natural and cultural aspects of the park. The operator will make these changes public when the ski resort development plans “are approved”, presumably by BC Parks, but it is not clear when the public will be consulted as to these changes. It is essential that the public has *adequate opportunities for consultation* during the planning stages, not after plans are approved as a “fait accompli”.
3. Although the draft refers to capacity and visitor management, which includes access to parks, it is unclear when capacity and visitor management are assessed and if any public consultation will occur before critical decisions are made which may impact non-paying public access to the parks. Visitor management is referenced in sections 2.3 and 5.2:
  - In 2.3, the draft states, “Planning for capacity and managing visitation to parks, including Ski Resort areas, is part of the work that BC Parks does with each Permittee and for each park individually and is not within the scope of this policy.” The section then goes on to state that rights and responsibilities for managing visitation to parks and access through the Permit Areas are set out in the Permit conditions for each of the Ski Resorts. Given the location of the Permit Areas in Mount Seymour and Cypress Parks particularly, the Permittees in essence control access to these parks, particularly when the ski resorts reach capacity.
  - In 5.2, the draft states, “This planning process [i.e., the park management planning process] may be used to determine visitor capacity, and if any limits for visitation are determined the Park Management Plan will set those limits.”

Given the public’s heavy use of the parks (both paying and non-paying), which will only increase given the proximity of the parks to the Lower Mainland, capacity and visitor management are critical to continued public access and enjoyment of the parks’ natural environments. Roles and responsibilities for capacity and visitor management must therefore be clearly set out, including the interrelationship between Ski Resort and park management planning, the timing of capacity and visitor management assessments, and opportunities for public consultation.

4. We feel the draft does not address adequately the maintenance of traditional and low impact use of parks, but instead concentrates on commercial use and development of parks. While we appreciate that this policy addresses commercial use of limited areas of parks, it should reiterate the original purpose of parks - which was for non-motorized recreation and access to wild and natural areas of the park.



## Federation of Mountain Clubs of BC

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We look forward to meeting with all the stakeholders soon to discuss the draft BC Parks Ski Resort Policy to consider ways to protect the natural environments and appropriate public use and access within the parks while providing reasonable certainty for the ski resort operators.

Yours sincerely,

Monika Bittel and Brian Wood,  
Co-Chairs, Recreation and Conservation Committee,  
Federation of Mountain Clubs of BC

cc. Hon. Mary Polak, Minister of Environment. Via email: [env.minister@gov.bc.ca](mailto:env.minister@gov.bc.ca)