



Federation of Mountain Clubs of BC

Accessing the backcountry one step at a time

PO Box 19673 Vancouver, BC V5T 4E7
fmcbc@mountainclubs.org
www.mountainclubs.org
Tel: 604.873.6096

July 18, 2017

Via Email: Kevin.Walker@gov.bc.ca

Kevin Walker
Land Officer
200 - 10428 153rd Street
Surrey, B.C.
V3R 1E1

Dear Sir,

**Re: Lands File Number: 2411569a
Licence of Occupation for Commercial Recreation - snowmobiling
Applicant: RWCB Adventures Ltd.**

The Federation of Mountain Clubs of British Columbia (FMCBC) is a province-wide umbrella organization of 42 outdoor recreation clubs with more than 5000 individual members. For over four decades, the FMCBC has represented non-motorized backcountry recreation interests and advocated for the preservation of and access to the wilderness experience for non-motorized backcountry enthusiasts.

The FMCBC has concerns about the application of RWCB Adventures Ltd., file number 2411569a, as the proposed snowmobiling tenure will significantly impact two popular backcountry skiing/snowshoeing areas: (1) Phelix Creek; and, (2) Semaphore Lakes. The dangers posed by high-speed snowmobiles, as well as their noise and pollution, destroy the wilderness experience for the non-motorized recreationists.

The application includes the Cadwallader Creek headwaters, which is very close to the Phelix Creek headwaters, where the UBC Varsity Outdoors Club (VOC) has a longstanding backcountry cabin (Brian Waddington hut). There are already snowmobile intrusions into the non-motorized area surrounding the VOC cabin via Cadwallader Creek and we believe granting a commercial snowmobiling tenure will simply legitimize motorized access to this non-motorized area and will create enforcement challenges. This is what occurred at Mount Sproatt, near Whistler, BC, where a commercial snowmobiling tenure facilitates public snowmobilers accessing the Rainbow Lake non-motorized area. Despite multiple efforts over the past eight years to educate snowmobilers about the Rainbow Lake non-motorized area, conflicts between non-motorized users and snowmobilers continue. To avoid the same problems in the Phelix Creek area, we recommend removing the area south of Piebiter Creek from the applicant's proposed tenure area to provide a reasonable buffer around the non-motorized Phelix Creek backcountry ski area. This would also reduce the detrimental impacts of snowmobiles on the Whitecap non-motorized ski lodge located in McGillivray Pass.

The Semaphore Lakes area is also a popular winter non-motorized destination area and we recommend removing the area west of the Hurley FSR, south of Freight Creek to the 1300 metre elevation point approximately 3 KM south of Railroad Pass, and east of Sampson Creek. This



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would provide a buffer around the popular winter backcountry ski/snowshoe area surrounding Semaphore Lakes.

Sincerely,

Monika Bittel

Co-chair, SWBC Recreation & Conservation Committee