



April 3, 2007

Diane Tetarenko,
Manager, Adventure Tourism
Ministry of Tourism, Sport and the Arts
Nanaimo, BC

Dear Ms. Tetarenko,

Re: Knight Inlet Helisports Communication and Avoidance Strategy

Thank you for forwarding the new strategy for communication and avoidance submitted by Knight Inlet Helisports (KIHS). The positive steps the proponent is taking to mitigate potential impacts with recreation parties in the proposed tenure area encourage the Federation of Mountain Clubs (FMC). With progressive mitigation measures in place there should be no need for conflicts, especially given the size of the potential operating area.

The strategy does however raise some issues of application and practicality that need to be addressed and we have made some suggestions. Notwithstanding our comments to this communication and avoidance strategy the FMC still has significant issues with the tenure application as a whole and in particular the inclusion of Zone 2, Mt Waddington. We will speak to the specific issues with this plan below, and follow-up on the general application and respond to your letter of March 15 in a separate submission.

I should first note that the KIHS Contact Information, which is fairly extensive, is a great resource for the recreational public and it will be useful for trip planning and perhaps more importantly emergency response should it be needed. We will add this information to our database of contacts and resources.

Our first observation is that the contact list (Appendix 1) is not conclusive. There are a number of entities, which potentially conduct trips in the proposed tenure area. Those located in BC include (but are not limited to): the five BC sections of the Alpine Club of Canada (Vancouver, Victoria, Prince George, Okanagan and Whistler); the British Columbia Mountaineering Club; The Kootenay Mountaineering Club; the Varsity Outdoors Club at UBC; the Island Mountain Ramblers in Nanaimo; the Heathens in Campbell River; and the Clearwater Outdoor Club. I personally know that each of the above-mentioned organizations have been in the area at least once, but there may be others. Other organizations outside of BC that we know use the area include (but are not limited to): the three Alberta sections of the Alpine Club of Canada (Calgary, Canmore and Edmonton); The Toronto section of the Alpine Club of Canada; the Alpine Club of Canada 'national' headquartered at Canmore; the Seattle Mountaineers; and the Mazamas in Portland Oregon, etc.

In addition to the Commercial Recreation Tenure holders (Appendix 2) there would be a number of commercial operators that would fall under “Incidental Use” (with respect to the existing CR Policy) in the area including (but are not limited to): the Adventure Programs Dept at Thompson Rivers University in Kamloops; the Association of Canadian Mountain Guides headquartered in Canmore; National Outdoor Leadership School (NOLS) out of Concrete WA; the American Alpine Institute in Bellingham WA; and numerous 'private' guiding companies based in Vancouver, Squamish, Banff, Canmore, and elsewhere. I should note that it is Canada West Mountain School in Vancouver (contact Brian Jones) and not Canada West School as identified in Appendix 2. And we are the Federation of Mountain Clubs not the Federation of Mountain Climbers. We should also point out that some parties access the Coast Ranges from Campbell River via West Coast Helicopters, Vancouver Island Helicopters, or other Island based companies. However Mike King of White Saddle Air is the main transporter and a key contact as identified.

We would suggest that KIHS attempt to maintain a contact list for the above organizations (and others that may use the area). However, if the intent is to reach the general recreational public “to determine if there are any existing users in the area or any planned tours”, as indicated in point 1, even the use of a more inclusive contact list will be problematic. While perhaps most parties that use the ranges may be associated with one of the identified clubs and organizations, trips would generally be organized in a 'private' manner by a small group of individuals, and would not necessarily be ‘club’ trips. Often the club has no knowledge of such trips until perhaps after they are complete and a member writes a story for the club newsletter.

Clubs do certainly offer organized trips into the area and these would certainly be easier to capture in planned communication. But generally it wouldn't be practical for clubs to get the information to and from members. Club contacts would also need to be considered. The two club contacts identified would not be “official” contacts for such matters; they are only expressing concerns about the application. I can try to provide appropriate club contacts, but as they are volunteer organizations contacts will be ever changing. Most clubs have a general email and phone contact that could be used and can be found on club websites. The FMC though not a club, it does include most of the clubs mentioned above as members and could certainly help to disseminate information to members. However, here again there would be no guarantee that the information is being received properly. And we certainly do not have the capacity to deal with information requests on a bi-weekly basis. We would suggest that KIHS send a broadcast e-mail out pre-season (and perhaps once mid season) to the more inclusive contact list reminding members that they should advise KIHS of upcoming activities.

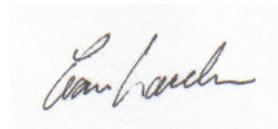
You would then need to consider the many climbers and skiers etc. that have no affiliation with any club or organization. I myself have organized a climbing trip into the Waddington Range with friends with no affiliation whatsoever. How would these interests be reached? Or do they need to be? We would suggest that there is some responsibility that needs to be assumed by public users that plan to go into these areas. Parties could proactively contact KIHS for information and to let them know of their trip plans and locations etc. KIHS could certainly make this process easier by providing relevant communication and avoidance information and contacts on their website. This is becoming standard practice in the heliski industry. It has been suggested that KIHS also consider having an area on their website where someone could enter their planning information (itinerary, intended camp locations, times, and contact info etc.). This is certainly something to consider. KIHS could also consider posting a bulletin and contact information on a website like Bivouc.com a website, which is used often by climbers and skiers for trip information.

The FMC also has some concerns with KIHS proposed avoidance strategy. We are pleased to note that KIHS has increased its proposed minimum distance from 1km to 5km. However the statement “or at least over the next ridge” is problematic for us. We do not want to be in a situation where a ski party is working hard to reach an objective on one side of a ridge and have helicopters buzzing around just over the ridge. We would expect KIHS to commit to a minimum 5km distance and over the next ridge, not an either or situation. Our hope is that given the enormity of the region covered by the application KIHS, as a responsible operator, would completely stay out of the drainage that the skiers or climbers are occupying.

This leads us to the logistics of avoiding parties in the field, whether or not they have made contact with KIHS. Ski tour and climbing trip itineraries and logistics are fluid and can change due to weather, terrain conditions and group abilities/dynamics. It would not be possible to predict with any degree of accuracy where a party will be on any given day. In addition parties can cover a large area (up to 15km from camp) in a typical travel day. Fixed camps will be easy to locate and avoid, but parties venturing for a day trip or parties advancing a camp would be much harder to locate. For this reason we would again hope and suggest that KIHS use a significant buffer (i.e. stay out of the appropriate drainage) to avoid parties. At a minimum KIHS (and parties) will need to keep on top of their communication to update pilots and guides of their whereabouts. Unfortunately KIHS may also need to do fly-bys to determine group locations and whether a group has left the area.

This addresses our main issues with the strategy. In closing we hope these concerns can be considered and our suggestions adopted in the Communication and Avoidance strategy and Management Plan by KIHS. Thank you for your attention to this submission and we look forward to your response.

Respectfully,



Evan Loveless
Executive Director
Federation of Mountain Clubs

CC. John Dawson, Knight Inlet Helisports Ltd.