



22 June 2015

Chris Hamilton
Executive Project Director
Environmental Assessment Office
PO Box 9426 Stn Prov Govt
Victoria, BC,
V8W 9V1

By email: Chris.Hamilton@gov.bc.ca

Re. Comments on Garibaldi at Squamish Supplemental Application

Dear Mr. Hamilton,

The Federation of Mountain Clubs of BC (FMCBC) is an umbrella organization of 34 non-motorized outdoor recreation clubs representing over 5000 individuals across B.C. For over forty years we have been representing the interests of our members and non-motorized outdoor recreation users and have been working to protect and maintain access to quality non-motorized recreation throughout B.C.

It is our opinion that the original and supplemental applications submitted by Garibaldi at Squamish Inc do not address our concerns regarding the negative impacts of the proposed resort on non-motorized recreation in the area. As stated in our letter sent to the Environmental Assessment Office on January 8, 2014 (http://mountainclubs.org/wp-content/uploads/2014/01/GAS_letter_Jan_2014.pdf), if this project proceeds, we foresee significant impacts on backcountry winter recreation and summer front country recreation.

We believe that if the resort goes ahead, there will be adverse effects on non-motorized backcountry recreation in Garibaldi Provincial Park which will compromise its non-motorized recreation values forever. Although the Supplemental Application shows minor adjustments to the northern and northwestern portions of the project area boundary, in our view, the proposed buffers of 25 and 50 m are insufficient to address the concerns outlined in our earlier submissions, including our letter of January 8, 2014.

We are also worried that once established the resort will want to expand their tenure area into Garibaldi Park as we saw when the borders of Garibaldi Park were changed to accommodate Whistler Blackcomb Ski Resort expansion. Any expansion into the park will negatively impact non-motorized backcountry recreation and will compromise the wilderness values of the park.



Furthermore, we are concerned that there will be negative impacts on the winter backcountry sharing accord which was reached by different winter backcountry recreation groups and was adopted by the Sea-to-Sky LRMP and accepted by the government. Areas along the Sea-to-Sky corridor have been zoned for different types of backcountry recreation uses and the Brohm Ridge, which is within the proposed GAS resort area, has become an important snowmobiling area. If the resort is built, the snowmobilers will be displaced and will likely be given another area as compensation for this displacement. This would inevitably result in the loss of a non-motorized recreation area along the Sea-to-Sky corridor.

We are pleased to see that the proposed 18-hole golf courses have been removed from the resort's development plans, but we still feel that the resort development will improve summer access to the western side of Garibaldi Park. This improved access will likely increase the number of summer visitors accessing an undeveloped area of the park. Any increase in visitors to this area of the park without providing corresponding facilities has the potential to cause serious environmental damage to the park and reduce its wilderness value to non-motorized recreation users.

Because of the potential negative impacts on backcountry non-motorized recreation, the FMCBC still does not support the GAS project and feels that it should not be allowed to proceed. We would like to request a letter from the Environmental Assessment office confirming that the concerns in our January 8, 2014 have been considered and brought to the attention of the proponent.

Jodi Appleton
Executive Director
Federation of Mountain Clubs of BC