



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. Garibaldi at Squamish Consultation to FMCBC

Dear Mr. Hamilton,

We are writing in regards to stakeholder consultation in relation to the Supplemental Application for the proposed Garibaldi at Squamish (GAS) Resort.

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.

The FMCBC and two of our member clubs (BC Mountaineering Club and Varsity Outdoor Club) have been listed in Table 5 on pages 17 and 18 in [Executive Summary](#) as having been consulted by the Proponent on the Supplemental Application. In fact, the FMCBC and these member clubs have not been consulted on the Supplemental Application and we feel that the level of stakeholder engagement is being misrepresented. The only direct consultation that the Proponent has had with the FMCBC was a meeting on September 24, 2007, as reflected in our follow-up letter of November 19, 2007. The meeting was in response to the FMCBC's initial comments on the GAS project.

Over the last fifteen years the FMCBC has submitted letters listing the numerous concerns we have with the GAS project. We are pleased to see that the plans for two golf courses have been removed from the application, but if the FMCBC had been directly consulted by



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fmcbc@mountainclubs.org
www.mountainclubs.org
Tel: 604.873.6096

the Proponent with respect to the Supplemental Application, they would be aware of our concerns that providing buffer zones of 25 and 50 metres from the Garibaldi Provincial Park Boundary are insufficient to protect the wilderness and recreation values of the park. We have submitted comments on the Supplemental Application.

The commonly recognized duty to consult includes a meaningful effort to accommodate concerns. At present we do not believe that enough accommodation has been made by the proponent to address our concerns and that consultation with our organization and our member clubs has been misrepresented by the Proponent. We feel that approval of the application should be delayed until the Proponent has duly and adequately consulted with the FMCBC and our member clubs.

We are requesting that the Environmental Assessment Office send a response to our concerns regarding the misrepresentation of the Proponent's consultation with the FMCBC and our member clubs.

Yours sincerely,

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