



2013-01-08

To: Jennie Aikman

I have prepared the attached comments working with members of the Federation of Mountain Clubs of BC Southwest BC Recreation and Conservation Committee.

Also attached is a copy of our hut policy.

It was good to meet you at the public meeting at Robson Square. Please call me at 604-209-2646 if you have any questions.

Jay MacArthur

Introduction

Federation of Mountain Clubs of BC (FMCBC) – SW Region Recreation and Conservation Committee members have reviewed the recent report from BC Parks: DRAFT Management Plan Amendment for the Spearhead Area - Garibaldi Park.

We have prepared the following comments (organized by section number in the draft plan amendment):

Section 5.2.1—LAND MANAGEMENT

Report Recommendation	FMCBC Response
<i>Objective: To work with adjacent land managers to provide appropriate public access to the Spearhead Area of the park.</i>	Agreed.
<i>Work with adjacent land managers to establish a new vehicle-accessible trailhead on the north side of Fitzsimmons Creek to provide summer access to the Singing Pass Trail.</i>	Agreed. As stated in our submissions of March 14, 2012, the FMCBC is willing to work with BC Parks and adjacent land managers to plan the access route.
<i>Connect the new trailhead to the existing Singing Pass Trail by way of a new trail, including a footbridge, over Fitzsimmons Creek.</i>	Agreed – see our submission from March 14, 2012.
<i>Explore the establishment of a trail from the trailhead to connect into the park on the Blackcomb Mountain side.</i>	Agreed – see our submission from March 14, 2012.

<p><i>Work with Whistler Blackcomb to improve the park visitor’s experience through the Controlled Recreation Area and provide appropriate all-season public access to the park. This includes working together to develop clearly demarcated trails with signage, and exploring measures to reduce other barriers to park access in summer and winter.</i></p>	<p>Agreed – see our submission from March 14, 2012. Year round public access routes through the Whistler Blackcomb Controlled Recreation Area are essential to access the Spearhead area. “Public access routes” should not require payment to Whistler Blackcomb or be subject to their authority.</p>
<p><i>Work with the Resort Municipality of Whistler to designate year-round parking in Whistler Village for both day use and overnight park visitors.</i></p>	<p>Agreed – see our submission from March 14, 2012. A free public access route through the Whistler Blackcomb controlled recreation area and appropriate day/overnight parking for park visitors is essential to maintain public access to Garibaldi Park.</p>
<p><i>Work with appropriate provincial ministries and the Resort Municipality of Whistler to improve access and signage to the Cheakamus Lake trailhead.</i></p>	<p>Agreed – see our submission from March 14, 2012. This access road needs improvement and more signs.</p>

Section 5.3—CULTURAL RESOURCES

Report Recommendation	FMCBC Response
<p><i>Promote and enable the practice of First Nations’ traditional use and activities in the Spearhead Area, including hunting, trapping, fishing, gathering, and social and ceremonial practices.</i></p>	<p>The FMCBC does not object to BC Parks' draft preamble or with the recommended objectives and actions under section 5.3, except as it relates to the first proposed action: <i>Promote and enable the practice of First Nations' traditional use and activities in the Spearhead area, including hunting, trapping, fishing, gathering, and social and ceremonial practices.</i> The focus of the draft plan is the Spearhead area, and while there may be other areas in Garibaldi Park that would be appropriate for First Nations' hunting and trapping, the Spearhead area is not one of these areas. Given the current intensity of use of the area which will only increase in the years to come, particularly if the proposed huts and trail systems are built or improved, hunting and trapping raise serious safety concerns and add a further stressor on the wildlife in this area. While not specified, presumably the wildlife to be hunted or trapped would include bear, marmots and mountain goats. Also, given the intense use of the Sea to Sky corridor and areas surrounding Garibaldi Park, which includes hunting and trapping, the</p>

	<p>ever expanding four seasons resort (Whistler/Blackcomb), a potentially new resort (GAS), housing developments, motorized and non-motorized recreation, forestry and other economic activities, the pressures on Garibaldi Park will increase, not decrease. The Park should therefore be promoted as a sanctuary/reserve/refuge, not only for humans, but also for wildlife and fauna. We therefore do not agree that BC Parks should enable or promote First Nations' hunting and trapping in the Spearhead area.</p>
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Section 6.2.1—HIKING/BACKPACKING

Report Recommendation	FMCBC Response
<p><i>Explore opportunities to develop an alpine hiking trail linking Blackcomb Mountain to Whistler Mountain. Any trail concept will need to ensure the trail provides a high-quality, safe hiking experience for a range of abilities, and will be designed to minimise long-term maintenance requirements and costs. The trail design will include basic facilities where appropriate, including campsites, pit toilets, and food caches.</i></p>	<p>Agreed. There is much interest in an alpine hiking trail or route, linking Blackcomb Mountain and Whistler Mountain. The cost to build and maintain such a trail must be budgeted for. The trail or route should not be commercialized and should be independent from Whistler-Blackcomb. There must be an adequate budget for maintenance of all trails in Garibaldi Park.</p>
<p><i>Work with Whistler Blackcomb to develop a trail connecting from the Flute Summit to the Singing Pass Trail.</i></p>	<p>Agreed. We support the establishment of an improved hiking trail to reduce erosion and protect the meadows. This trail-work should be done after improvements to the Singing Pass trailhead as discussed in section 5.2.1.</p>
<p><i>Hiking trails and any associated facilities will be designed to minimize impacts to sensitive ecosystems and wildlife. Ecosystem values of particular concern include Mountain Goats and alpine meadow vegetation.</i></p>	<p>Agreed.</p>
<p><i>Develop a trail from Cheakamus Lake to Singing Pass.</i></p>	<p>Agreed this would make a good route, but we are concerned about funding for this. Before new trails are built, an inventory is needed of all existing trails in Garibaldi Park. There must be an adequate budget for trail construction and maintenance.</p>
<p><i>Develop a loop trail linking Russet Lake and Adit Lake.</i></p>	<p>Agreed this would make a good route, but we are concerned about funding for this. Before new trails are built, an inventory is needed of all</p>

	existing trails in Garibaldi Park. There must be an adequate budget for trail construction and maintenance.
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Section 6.2.3—MOUNTAIN BIKING

Report Recommendation	FMCBC Response
<p><i>Objective: Encourage mountain bike access to park trailhead parking areas but limit cycling to two areas: the Red Heather Ridge trail up to the Elfin Shelter and the proposed south Cheakamus River Trail.</i></p>	<p>Agreed, for the reasons stated in our submission of March 14, 2012. We agree that the existing trails to Singing Pass and to Cheakamus Lake are too busy and muddy for mountain bikes. Our primary concerns are user conflicts, damage to sensitive alpine ecosystems, wildlife conflicts and the expense of maintaining and monitoring bike trails in sensitive alpine ecosystems. There are areas outside Garibaldi Park where mountain biking is more appropriate. Perhaps a bike rack could be installed on the Cheakamus Lake trail about 200 m up the trail with signs encouraging bikers to hike to the lake. A bike rack and signs should also be installed when a new trailhead is constructed for the Singing Pass trail.</p>

Section 6.2.4—WINTER RECREATION [BACKCOUNTRY HUTS]

Report Recommendation	FMCBC Response
<p><i>Backcountry huts are acceptable in the Spearhead Area if the following conditions are adequately addressed:</i></p> <ul style="list-style-type: none"> <i>– Huts will be accessible to the public at an affordable cost.</i> <i>– Huts will provide comfortable accommodation with minimal facilities to support self-sufficient users.</i> <i>– Huts will be designed to accommodate winter and summer use.</i> <i>– Huts, and access to the huts, will be located in areas where impacts to alpine ecosystems and wildlife, including Mountain Goats, are minimised. Huts will not be located in Mountain Goat winter range, and huts will avoid alpine forage habitat adjacent to Mountain Goat winter range.</i> <i>– Any hut proposal will seek to minimise the number of huts.</i> <i>– Any hut proposal will need to describe how water usage and waste management will be addressed, including developing an operational plan which minimises any air access required for servicing the huts. Hut users will be encouraged to pack out their waste.</i> 	<p>This seems like a reasonable starting point for further planning. However the carrying capacity of the Spearhead area and adjacent wilderness areas has not been raised or considered. How many people can the area support without “ruining” the area? While in agreement that huts and associated facilities provide a way to focus and manage visitor impacts and use, any proposed hut system will result in increased visitation. Any facility development in the Spearhead area will have a detrimental impact on adjacent wilderness areas. The carrying capacity of the Spearhead area and adjacent wilderness areas is therefore a critical and determining consideration before any facility development, whether trails, huts, campsites, outhouses, etc. is undertaken in the Spearhead area.</p>

<ul style="list-style-type: none"> - Any hut proposal will need to include a health and safety plan to address public health and safety associated with both the access to, and use of, the huts. - Any hut proposal will need to include a wildfire plan to address wildfire risk. 	
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Section 6.2.5—COMMERCIAL RECREATION SERVICES—HELI-SKIING

Report Recommendation	FMCBC Response
<p><i>The heli-skiing opportunities will continue to be a recreation service offered in the park. However, no new areas will be considered within the park for additional heli-skiing.</i></p>	<p>FMCBC members are very disappointed that the draft plan includes this recommendation.</p> <p>Our members are strongly opposed to the renewal of the park-use permit for heli-skiing.</p> <p>We have opposed heli-skiing in the park for many years. The Spearhead area provides some of the best backcountry skiing in the area. Virtually all, traditional non-motorized recreation areas in the Sea to Sky corridor have either been lost to unmanaged and unregulated snowmobiler use or are encompassed in Whistler Heli-Skiing’s (WHS) tenure. Garibaldi Park is therefore the only remaining area where back-country users can escape the noise, smell and dangers of motorized activities (snowmobiles and heli-skiing). Motorized access and recreation destroy the wilderness experience for those who use the Park for peaceful, self-propelled recreation. Heli-skiers can also “track-out” an area quickly, spoiling the experience for other backcountry users.</p> <p>The Spearhead area is a small percentage of the WHS tenure and although we understand it is important to the operator, they can fly to another area within their tenure to avoid backcountry skiers, whereas it is very difficult or impossible for back country skiers to avoid heli-skiers. We recommend that heli-skiing should be phased out over the next five years as use of the Spearhead Range by backcountry users increases.</p> <p>We are pleased that you will not consider expanding the tenure area.</p>

BC Parks will work with the heli-ski operator to add value for other park user groups and develop a permit management plan which includes restrictions on usage as required to minimise user conflicts and minimise impacts to Mountain Goats and other wildlife.

We are disappointed that BC Parks appears to be giving more weight to the arguments from a commercial operator than public users. There has been an enormous increase in backcountry skiing in the Spearhead Range over the past decade and this increase will only continue. The Spearhead Range offers a world-class ski-mountaineering route that will be a magnet for tourists from around the world. As more backcountry skiers use the Spearhead Range, we don't see how conflicts between backcountry users and heli-skiers can be avoided. Rather, conflicts will increase.

If heli-skiing is allowed to continue in the Park, which we strongly oppose, we recommend a permit management plan, which includes restrictions and possible elimination of heli-skiing if conflicts increase. The wording of the amendment must allow BC Parks to consider the phasing out of heli-skiing in the future. A formal avoidance policy must be developed by BC Parks to ensure that the heli-ski operator does not operate in the area when backcountry users are there. Park permit renewals should be limited to 5 year terms, as opposed to 10 or 15 year terms, to allow for ongoing monitoring of user conflicts, particularly as visitations are expected to increase, if a hut system is developed in the Spearhead Area. Further, heli-skiing should be prohibited on weekends, statutory holidays and other peak use days or weeks.

Monitoring of user conflicts should allow for public feedback. Before renewing WHS's park use permit in the future, BC Parks should solicit feedback from the public on WHS's performance and conflict management and not simply rely on self-reports from WHS, the park permit holder, or haphazard public complaints to BC Parks. This will introduce some independence in the evaluation process and increase accountability by both WHS and BC Parks.

We disagree that the heli-ski operator can add value for backcountry users. A commercial heli-ski operator cannot and should not be relied upon to provide support services, public safety and emergency response. Commercial heli-ski operators have complained of the "costs" associated with downtime and the disruption of their service to clients, while rendering assistance to other backcountry users. There is also only a small chance that a helicopter will be there at the right time. The heli-ski operator's helicopters will typically be filled with clients and therefore limited in their ability to render immediate assistance. If helicopter services are required, the Whistler heli-base is a short flight to the Spearhead. Other backcountry users, search and rescue or an air ambulance will be the primary first responders.

	<p>Regarding the locations of the proposed huts, we do not believe that conflicts can be mitigated by choosing different locations for the huts. Heli-ski routes occur throughout the Spearhead Range, crossing the normal Spearhead traverse ski route in multiple locations. Looking at the map on the operator's website, no reasonable ridge-top or col location is untouched by heli-skiing.</p> <p>The sites for the proposed huts must be chosen with the practical requirements of construction and the users' physical abilities (travel times /distances). Safety of hut users must be kept in mind. Otherwise the huts will not function and people will be endangered. Any impacts on heli-skiing must be secondary.</p>
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