

# FMCBC Response to South Chilcotin and Big Creek Provincial Parks Draft Plans

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June 6, 2016

## Introduction

The Federation of Mountain Clubs of BC was involved in the Lillooet LRMP and other planning processes that resulted in the designation of the area as South Chilcotin Mountains and Big Creek Provincial Parks. Our members have used the area for at least 50 years. We want to be partners with BC Parks in maintaining the incredible wilderness values.

## Comments on Plan Highlights:

The FMCBC fully supports the key strategies that are described in the plan highlights. We have copied the strategies below and fully agree that plan implementation will depend on adequate funding for BC Parks.

Key strategies will be to:

- collect and map information on ecological values and wildlife habitats to enable future decisions on recreational activities and potential zoning of the parks;
- integrate the parks into the larger landscape through cooperation with adjacent land managers;
- provide needed attention to the condition and impacts of the existing trail system;
- increase the BC Parks presence;
- ensure that visitors know how to behave in bear country and prevent ecological impacts in a sensitive environment; and
- develop acceptable floatplane access plans that meet the expectations of park visitors.

## Vision

We approve of the vision in Section 3.1.  
June 2016: Still looks great!

## Good Objectives

- Maintain the existing natural diversity of plant and wildlife species and natural ecological processes. (Section 3.2.1)
- Provide for continuity of ecosystems to allow for altitudinal and latitudinal migration of ecosystem components and continuity of habitats in order to offset the effects of climate change.
- Maintain a backcountry and wilderness experience within the parks.
- Maintain the qualities of the environment that form the basis of the recreational attraction, including wilderness, solitude, viewsapes, wildlife and ecosystems.

## Strategies that we like

- Encourage a shift from day-use mountain biking (fly in – ride out) to a more leisurely, group oriented, multi-day approach to reduce the potential for wildlife disturbance and conflicts with other users.
- Do not allow tourism facilities to be placed in key recreation attraction areas (e.g., lakeshores, wildlife viewing areas, open meadows, open alpine areas) and require them to be hidden from view as much as possible.

However, the second point implies that there may be more tourism facilities inside the park. Our opinion is that there are already too many camps and cabins controlled by outside interests (with park use permits?). We recommend against special areas for commercial clients in wilderness recreation zones. Wilderness zones in Provincial Parks should be managed equitably for all users with the same level of wilderness camping or rustic huts/cabins available at reasonable rates for all.

## Comments on some of the strategies in Final Draft

Final Draft Plan	FMCBC Comment
<p>Make the park boundary more definable and easily located on the ground.</p> <p>Recommend that the park boundary be adjusted to use Gun Creek as the boundary in the southeast of South Chilcotin Mountains Park (between UTM coordinates N 5639354, E 508452 to N 5640063, E 505463).</p>	<p>A park boundary 20 m south of the creek edge would be better as a buffer.</p>

<p>Recognize commercial floatplane access as an appropriate means of access for many park visitors while keeping an acceptable level of disturbance for visitors and wildlife. Consult with commercial floatplane operators as part of the overall access plan in order to meet the objectives this management plan, avoid disturbance of wildlife and maintain a feeling of solitude for visitors. This may require limiting access by setting maximum number of flights or reducing flights.</p> <p>Work toward flight schedules that both recognize Spruce Lake as the primary and regular entry point into South Chilcotin Mountains Park, but also provide for quiet, undisturbed opportunities for visitors staying at the campgrounds; treat Warner Lake and Lorna Lake as less disturbed wilderness locations; and avoid park overflights or viewscape sightseeing.</p> <p>(Section 3.2.4)</p>	<p>This wording is a bit better but still not very clear.</p> <p>Historically, floatplane access has only been to Spruce and Lorna lakes. Only recently have commercial floatplanes started dropping mountain-bikers at Warner Lake. The zoning shouldn't have an area in the centre of the park in a "non-wilderness" zone. Mountain biking day trips should be moved away from this area. We recommend that Warner Lake be a plane free wilderness zone.</p> <p>We understand that many mountain bikers and a few commercial groups are lobbying to maintain flights to Warner Lake. We understand that some people would like to fly in with their bikes, but this does not fit in to the wilderness values that need protection.</p> <p>Lorna Lake has been used as a location for the start of a few weeklong camps over the years. We can see limited floatplane use at Lorna Lake with the restrictions mentioned below.</p>
<p>Docks for floatplane access on Warner and Lorna lakes will be inconspicuous in keeping with a wilderness viewscape.</p>	<p>Warner and Lorna Lakes are both remote wilderness lakes that should not have docks or any structures.</p>
<p>Provide opportunities for hunting. (Section 3.2.5)</p>	<p>Are there any regulations to restrict hunting close to campsites? Perhaps a 1 km buffer would be appropriate</p>
<p>Use the separation of activities (e.g., use-specific trails in high use areas, twinning trails, timing, location, trail direction, etc.) as a suitable management tool in specific instances, but not to be used as a widespread strategy in</p>	<p>Separation may be required if use increases in some areas, but some detailed on the ground discussions are required between different user groups before this is considered. Restrictions on bike and horse use in some areas during wet weather should be considered.</p>

<p>the parks. Consider designing some trails for one user type (long sections of such trails should not exclude other users). This will make some trails generally more attractive to one user group, decreasing pressure on more heavily used trails. For example, consider construction of a new Tyaughton Creek trail south of the creek as a replacement for the trail on the north side, primarily for mountain bikers to attract bikers away from more heavily used trails; consider a trail from Windy Pass to the north end of Spruce Lake for bikes only.</p>	<p>The proposed trail on the south side of Tyaughton Creek might be good to reduce conflicts on the Gun Creek trail. Perhaps the Gun Creek trail could be used for mountain biking up and the Tyaughton for biking down. That would make a good loop. We are not sure about another trail from Windy Pass. This is area used by Grizzly.</p>
<p><b>Section 3.2.5 Final Draft Plans</b></p>	<p><b>FMCBC Comments</b></p>
<p>Visitor numbers should be collected and monitored, together with visitor satisfaction surveys, on various trails to determine the need to preserve the expected remote experience, assess conflicts between visitors and impacts from specific users. Management action, such as quotas, should be considered where necessary. This would include indications of wildlife displacement or visitor dissatisfaction with the degree of solitude.</p>	<p>We support this. We hope that BC Parks will have funding to follow through with proper studies to gather information and consult with the public.</p>
<p>Campgrounds can be overcrowded at times. Official campsites have been suggested at Lorna Lake, Hummingbird Lake, Trigger Lake, Warner Lake, Deer Pass/Tyax Creek Junction and at the end of Relay Creek.</p>	<p>We should not use a “build it and they will come” philosophy in the parks. Let’s work together to figure out how we want to protect the wilderness and wildlife. Yes Lorna Lake is a fantastic wilderness location, but a campground should not be constructed close to the lake. Perhaps 500-1000m north along Big Creek there might be a suitable location. Let’s keep the wilderness feel at the lake.</p>

	<p>Warner Lake doesn't have a lot of flat dry ground close-by. Any facilities should be in keeping with BC Park's objectives: low profile, hidden from view when possible, and rustic in character, blending in with the natural environment.</p> <p>There is a small campground at Trigger Lake that was built by the Forest Service many years ago. Hummingbird Lake is quite small - we don't recommend a campground close to it.</p> <p>There is an old camp close to the Deer Pass trail – Tyaughton Creek junction that can continue to be used with some modest improvements. Does the guide outfitter still use that camp?</p>
<p>Cross-country mountain bike riding, rather than downhill, will be the principal form of mountain biking in the parks.</p>	<p>Agreed. One other point that our members have discussed: We recommend that perhaps electric-bikes should be banned in Big Creek and South Chilcotin Provincial Park on trails. Wilderness zones should be areas for self-propelled recreation.</p>
<p>Development or construction of technical trail features will not be considered.</p>	<p>Agreed.</p>
<p>Mountain biking will be restricted to existing or future trails; off-trail use will not be permitted.</p>	<p>Agreed, but mountain biking should not be permitted on all trails. There should be some trails primarily for hikers and horses. For example, the Gun Creek Trail west of Spruce Lake and the Deer Pass trail are areas where the trail is wetter and will be hard to maintain with much mountain bike use. Our vision is not for hardened mountain bike trails in wilderness. The Gun Creek trail is part of the Trans-Canada trail.</p>
<p>Trails used by mountain bikes should have good sight lines on downhill sections (e.g., 3X3m width and height).</p>	<p>Trails in a wilderness park should not be cleared to meet this standard. If a trail does not meet this standard in more than one or two places, mountain biking should not be permitted.</p> <p>Any additional safety generated by good sight lines may be lost by the higher speeds they permit on downhill sections.</p>
<p>Provide camping opportunities that are compatible with a feeling of solitude and that have a minimal impact on the environment.</p>	<p>Agreed. In a few areas of the parks, the guide outfitters currently have "private" camps that don't look the best. Could the outfitters share hardened and reserved campsites with public users? We understand that some campsites need</p>

	<p>to be reserved for guide outfitters that have historic tenures, but they shouldn't have exclusive use of prime locations.</p>
<p>Consider campground redevelopment on Spruce Lake for location, setting and visitor experience with consideration for alternate siting and improvements.</p>	<p>You have changed the wording a bit to soften it, but this is the best location for camping at Spruce Lake. If this campsite is closed, the adjacent commercial "lodge" must also be closed otherwise the plan will be viewed as giving preference to the commercial operator. Ideally wilderness campsites should be located at least 100 m away from alpine lakes, however we are not sure that there are good flat locations close to the lake that are not also prime grizzly habitat.</p> <p>Is there any chance that one of the private cabins on Spruce Lake could be donated to BC Parks and then destroyed?</p> <p>We don't think the existing old cabin used by the guide outfitter should be repaired at the present location so close to the lake. It doesn't fit in with your objective of having tourism facilities "hidden". Perhaps the commercial operator should share the public campground with a reservation system. Perhaps a small cooking shelter further back from the lake would work here.</p>
<p>Consider moving existing facilities where they are near habitats frequented by wildlife (especially Grizzly Bear) or on migration routes. The option of moving one of the tourism facilities and docks on Spruce Lake to the east side of the lake could be considered, primarily to decrease human presence in the area of Grizzly Bear habitat that is located on the north and northwest shore of the lake and north along the outlet, and to alleviate congestion in this area.</p>	<p>This is new and maybe related to our comments above. However, repeating a point we made above: We recommend against special areas for commercial recreation clients in wilderness recreation zones. Wilderness zones in Provincial Parks should be managed equitably for all users with the same level of wilderness camping or rustic huts/cabins available at reasonable rates for all.</p>
<p>Minimize environmental impacts at popular camping sites through regular monitoring, provision of adequate sanitary facilities,</p>	<p>This wording is better, but still not very clear. We don't think that fire rings should be provided at most campgrounds. We understand that campfires have been widely used by campers, but</p>

<p>hardening sites as required, and addressing issues (e.g., firewood gathering, erosion, garbage) as they arise. Dispersed, no-trace camping may occur elsewhere.</p> <p>Public campsites will be rustic with minimal facilities, appropriate for a wilderness setting. Provide only a basic infrastructure (fire rings and outhouses in regular backcountry sites; picnic tables in main access campgrounds) necessary for visitor appreciation of the parks.</p>	<p>in alpine areas they are not appropriate. Perhaps one group fire-ring is appropriate at each of the Spruce Lake camps further back from the lake. They should only be used when there is absolutely no fire hazard. Another problem with the fires is who will decide where dead wood will be collected from? Does BC Parks have the resources to supply wood or monitor use at the campsites?</p> <p>Another question is about adding tent platforms. BC Parks and Parks Canada provide tent platforms at some sub-alpine and alpine locations to reduce damage to meadows. Does BC Parks plan to do that at any of the busier campsites?</p>
<p>Continue to allow snowmobile use only on the Gun Creek trail to the Jewel Bridge and the area west of and including Wolverine Pass and Taylor Pass. Snowmobiles will not be allowed to descend into the Eldorado Creek or Pearson Creek watersheds from Harris Ridge or enter into Mountain Goat winter habitat within the park.</p>	<p>We generally agree with this recommendation. However, the statement about the Gun Creek trails doesn't make sense since the trail starts at the Jewell Bridge. I suppose there was an old trail further east, but most of that is outside the park. The park planning process talked about allowing snowmobile use in Slim Creek (outside park), but to keep the park area for wildlife and non-motorized activities in the winter. A map that shows that the majority of the park is not open to snowmobiles should be included in the final plan.</p>
<p>Heli-ski flight paths will avoid backcountry skiing areas as much as possible.</p>	<p>Agreed but the wording has been watered down and is not very clear. We are working on a detailed heli-ski/backcountry skier avoidance policy that we will forward to BC Parks. Thank you for including the map that shows where and when heli-skiing is currently permitted within the park areas. Any heli-ski tenures in the park should be short-term (5 year) permits to allow for changes if use patterns change. We are not pleased that the permit area conflicts with existing backcountry ski areas just east of Spruce Lake.</p>

## Management Services (Section 3.2.8)

<b>Final Draft Plan</b>	<b>FMCBC Comments</b>
Collectively meet with stakeholders on a regular basis (at least annually) to contribute to meeting park objectives.	We support this and would like to participate.
Investigate communication methods within the park to enable communication between tourism operators and BC Parks staff in order to coordinate travel plans, maximize trail use while maintaining a remote experience, and increase safety.	Thank you for changing the wording. Newer text via satellite technologies may meet this need without requiring towers. We definitely don't like the idea of towers in a wilderness park.

## Zoning (Section 3.3)

We appreciate that the zoning plan shows the higher value ecosystems that are important for large mammal species. However, we think that more work needs to go into recreational zoning. As described above we have concerns about concentrating day trip flights into more remote areas of the parks.