



Federation of Mountain Clubs of BC

Accessing the backcountry one step at a time

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June 9, 2010

The Honourable Patrick Bell
Minister Responsible for the Integrated Land Management Bureau
Room 138
Parliament Buildings
Victoria, BC V8V 1X4
Tel. 250 387-6240
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Re: Administrative revisions to the Sea to Sky Land and Resource Management Plan (LRMP)

Dear Minister,

The Federation of Mountain Clubs of British Columbia (FMCBC) is an umbrella organization of approximately 20 outdoor recreation clubs having a total membership of about 3500 individual members dispersed throughout the province. We have represented self-propelled/non-motorized backcountry recreationists throughout the Sea to Sky LRMP process and its precursor, the Sea to Sky Backcountry Winter Sharing Forum.

We have recently become aware of several administrative revisions to the LRMP which were approved on December 8th, 2009. Administrative revision #3 includes changes to the first table in section 5.2.2, regarding the types of lodges and cabins allowed in various Wildland zones. The FMCBC is concerned that what is labelled as a simple administrative revision may have larger than envisioned consequences for the implementation of the LRMP.

In the original LRMP document, the wording was such that any overnight commercial recreation facility was called a "lodge." The revision changes this so that commercial facilities accommodating more than 12 persons are called "lodges" and those accommodating up to 12 persons are called "cabins." There are several places in the LRMP that state "no commercial lodges" or something similar. In our opinion, these statements could have been interpreted by stakeholders to mean that no overnight commercial facilities of any size would be permitted. Under the revised LRMP commercial "cabins" would be permitted in these areas.

We feel that this is a substantial change that is not appropriate for the administrative revision process. We feel that, at a minimum, the following areas of the LRMP should be reviewed to determine what the specific intent of the stakeholders was in terms of the prohibition on commercial facilities:

- Wildland #4 (Cultural) "North Lizzie Creek to Cloudraker Mountain"
- Wildland #24 (Recreational) "Twin 1 / Twin 2 Divide to Joffre Lakes Park"
- Wildland #30 (Tourism) "Tantalus South - Woodfibre - Echo Lake"
- Wildland #32 (Tourism) "Upper Ashlu"

We would also like to point out that while there are many instances of the phrase "commercial lodge" in the LRMP document, the new terminology of "commercial cabin" is not used. This casts a shadow on the interpretation that this lodge/cabin distinction was supposed to be clear and that only an administrative revision was required.

We understand that drafting complex documents such as the LRMP can be complicated and are open to more discussions on this matter. Please let us know who we can contact to discuss this further.

Sincerely,

Scott Webster
Vice-President, FMCBC