

The Federation of Mountain Clubs of BC (FMCBC) promotes self-propelled activities, such as hiking, mountaineering, trail running and backcountry skiing through leadership, advocacy and education. We are a federation of 44 outdoor clubs with a membership of over 5,100 people from across the province. We engage with outdoor recreation organizations, government agencies and others to protect and maintain access for quality non-motorized recreation in BC's mountains and wilderness.

We have reviewed the Tenure Management Plan for Summer Operations of Sunshine Coast Mountain Adventures Ltd. (File: #2411953) and we oppose the proposed tenure application for the following reasons:

1. Heli-assisted day use wilderness activities: The FMCBC does not endorse day, or partial day, heli-assisted hiking, mountain biking, climbing, Via-Ferrata or picnicking in wilderness areas for environmental reasons and because of the negative impacts heli-assisted activities can have on remote, fragile alpine ecosystems and on other users' quiet enjoyment of remote wilderness areas.
2. Estimated full capacity use: The estimated full capacity use figures cited in Appendix 1 of the Tenure Management Plan are significant and concerning, given the proximity of a number of the proposed adventure zones (e.g., Buck Mountain, Mt. Crucil, Wakefield Matrix and the Henrietta Lake / Sylvia Lake / Mt. Sedgewick area) to the heavily populated Lower Mainland and the Sunshine Coast and Sea-to-Sky Corridor communities, whose populations continue to expand. Residents of the Lower Mainland, Sunshine Coast and Sea-to-Sky Corridor are already challenged to find backcountry areas where they can enjoy a wilderness experience. Introducing heli-assisted recreational activities will simply make it that much harder to get away from "civilization". **Only 4% of the Sunshine Coast has provincial protection.** Motorized air access significantly detracts from the wilderness experience of others. Lake Lovely Water and Spruce Lake are examples of wilderness areas where aircraft facilitated day use negatively impacts the wilderness experience of other users. Although the form of recreation (mountain biking, hiking, climbing or picnicking) conforms to the established or traditional recreational use in these areas, the motorized facilitated access (i.e., aircraft facilitated access for day mountain biking at Spruce Lake; and, heli-assisted day climbing in the Tantalus Range and sightseeing at Lake Lovely Water) has come to dominate these popular wilderness recreation areas to the detriment of the multi-day, non-motorized wilderness recreation users. We are concerned that the proponent's estimated full capacity use for the proposed adventure zones identified above will have the same negative impacts on the wilderness experience enjoyed by others in or near these proposed adventure zones.
3. Proposed adventure zones of Buck Mountain, Mt. Crucil and Wakefield Matrix: Given the proximity of these proposed adventure zones to the Sunshine Coast communities and public recreation areas (including Tetrahedron Provincial Park with respect to the Mt. Crucil zone), we recommend that before the tenure is considered, the proponent be required to conduct public information meetings in the Sunshine Coast communities and respond to any development and operation concerns raised by the communities and the public users . These operations will have significant negative impacts on visitors to Buck Mountain, Mt. Crucil, Wakefield Matrix, and of course, Spipiyus, Mount Richardson, and Tetrahedron Provincial Parks.
4. Proposed Sechelt Lake / Howe Sound adventure zone encompassing Henrietta Lake / Sylvia Lake / Mt. Sedgewick: The Henrietta Lake / Sylvia Lake / Mt. Roderick / Mt. Sedgewick area was a popular hiking / ski touring destination until the ferry service from Darrell Bay to the Woodfibre Mill was discontinued. The proposed LNG project at Woodfibre however has raised renewed interest in this

area. About 18 months ago, the FMCBC participated in a stakeholders' consultation meeting with the LNG proponent, who appeared amenable to restoring access to the existing trail system in the area. When access is restored, we believe this area will again become a popular wilderness non-motorized recreation area and this will help reduce the pressures on the heavily used recreation sites and trails in the Sea-to-Sky Corridor. For this reason, we are opposed to the inclusion of the Henrietta Lake / Sylvia Lake / Mt. Sedgwick area within the proposed tenure of Sunshine Coast Mountain Adventures.

5. Proposed Clowhom / Phantom Lake adventure zone: We have concerns about the proximity of this proposed adventure zone to Tantalus Provincial Park, which includes the popular multi-day climbing and hiking destinations of Mt. Ossa and Mt. Pelion at the northern end of the park. Since this portion of the Tantalus Provincial Park is designated Wilderness Recreation Zone, heli-assisted activities and motorized access are not permitted, allowing visitors to enjoy a remote, wilderness experience. We are concerned that the estimated frequency of heli-assisted activities (i.e., Via Ferrata, picnicking, biking and hiking) in the proposed Clowhom / Phantom Lake adventure zone will detract from the wilderness experience presently enjoyed by the park visitors. If the proposed tenure is approved, with Clowhom / Phantom Lake adventure zone included in the tenure, strategic use of the zone by the proponent may minimize the impact of the heli-assisted activities on visitors to Tantalus Provincial Park. This would include the location of any camps, picnic sites and heli-drop-off and pick-up locations.
6. Heli-assisted Via Ferrata: In our view, it is premature to include this heli-assisted activity in the proposed tenure because there is insufficient information provided by the proponent, other than to identify the Clowhom / Phantom Lake adventure zone as a possible location for this activity. When the proponent has researched the potential location and market demand for this activity, the proponent can submit a tenure application and give the public the opportunity to review and comment on the proposal.

To summarize: while it is apparent this application may present some limited commercial opportunities to a few individuals ultimately those who are simply trying to appreciate the wilderness experience in these wilderness areas will be compromised. What tangible and significant return does the province actually attain as compared to the significant loss of the true experience of the backcountry that is currently so accessible to all – regardless of affluence?

Submitted by:

Barry J Janyk
Executive Director
Federation of Mountain Clubs of BC
www.mountainclubs.org
604.873.6096

Soyons réalistes, nous allons rêver l'impossible

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