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Via email: Bickerton, Nicola.Bickerton@gov.bc.ca

Re: Blackcomb Helicopters Ltd, Heli-biking application Lands File number 2411936

I'm on the executive of the Vancouver Section of the Alpine Club of Canada and also a director with the Federation of Mountain Clubs of BC.

I have reviewed the application and am very concerned about the following proposed heli-biking routes:

Mount Barbour, NW of Pemberton is not currently a popular hiking or mountaineering objective but it is very close to two very popular locations: Tenquile Lake and Sun God Mountain. Adding more helicopter and mountain bike use will not be popular with existing users who visit these areas to experience the wilderness and enjoy the peace and quiet. Mount Barbour is in the middle of a possible high ridge traverse between Sun God and Tenquile Lake.

Barbour South, Ogre Owl, MacKenzie Ridge

These areas are also in the Tenquile-Owl Recreation Area and increase use will have a negative affect on the current users of this area that are searching a wilderness experience.

Ipsoot and Rutherford Ridge

Mount Ipsoot is a popular mountaineering destination but I don't have any information on the use of the area. See my notes below about general concerns and the information from ACC Whistler.

Rutherford Ridge

I'm not aware of much current public use of the ridge due to the difficult access. See my notes below about general concerns and the notes from ACC Whistler.

General concerns:

- I believe that mountain bikes do not belong in wilderness areas like this. Trails that look natural, that blend into the environment can never be built on mountain ridges to withstand high levels of mountain bike use.
- If you watch any mountain bike video, you can see the constant erosion that mountain bikes cause. Building a trail to withstand this will destroy natural vegetation and be an eyesore on a mountain ridge.

- Mountain bikes and increased helicopter use are not compatible with wildlife values in my opinion.

Concerns from ACC Whistler Section

1. Motorized access, particularly by helicopters whose very loud sound can be heard over large distances, greatly impacts the quiet enjoyment of other backcountry users who are in the vicinity. The negative impact of the helicopters on other recreationists enjoying the area cannot be underestimated. The noise from both the flight paths and the landing zones is very disruptive and drastically reduces other backcountry users' enjoyment of the area.
2. With the exponential increase in backcountry users throughout the Sea to Sky corridor over the past few years many areas are already seeing large numbers of users who are accessing the backcountry by non-motorized means. This is especially true in the Tenquille-Owl Lake Recreation Area (TOLRA). Granting a heli-biking license in the area will undoubtedly increase the user numbers beyond the carrying capacity of the area leading to a substantial decrease in the quiet enjoyment of the area by other users who have traditionally visited the area by human power for its unspoiled natural beauty. The general public clearly shares this concern as over 1880 people have signed the online petition against heli-biking in the TOLRA. (For the petition and comments go to <https://www.change.org/p/forests-lands-and-natural-resources-preserve-the-tenquille-to-owl-lake-recreation-area>.)
3. While we believe that heli-biking in general is not an appropriate activity, we are adamant that it should not be legitimized in an area with decades long history of self propelled recreation. History has demonstrated that inevitably motorized access ultimately becomes the dominant activity to the detriment of all other user groups.
4. Much of the terrain in the TOLRA is sensitive alpine and sub alpine that is extremely vulnerable to erosion and degradation caused by mountain bikes. The current number of visitors to the area is still within the tolerance levels that the area can handle without serious ecological damage. Adding hundreds of mountain bikers to the area will definitely exceed the area's ecological carrying capacity resulting in irreversible ecological damage.
5. As the number of backcountry users increases there is a corresponding increase in the number of backcountry users who are capable of, and willing to, access more areas of the backcountry by human power either on foot or by bike. There are sufficient numbers of people accessing the Sea to Sky backcountry by human power that there isn't a need for motorized access, particularly helicopter access. Having helicopter access to these areas will inevitably lead to conflicts between the human powered access group and the helicopter access group. In every case the human powered access group is inevitably the looser when this conflict arises. Some outdoor clubs, including the Alpine Club of Canada-Whistler Section, have recognized this issue and now have a policy against using motorized access for any area that can be reached by human power in a day. This applies to both summer and winter.
6. Noise from helicopter flight paths and landing zones is extremely disruptive for wildlife. In areas that are already frequently used by hikers and self-propelled mountain bikers, introducing another more intrusive source of stress to wildlife is unacceptable. In areas such as the TOLRA, Rutherford, and Soo where wildlife is frequently subjected to the unrelenting intrusion of snowmobiles in winter having the negative impact of helicopters in summer would mean that the wildlife habitat is being disrupted for much of the year.

7. While the Rutherford and Ipsoot areas included in this application do not see the same volume of users as the TOLRA, our concerns regarding noise, flight paths, user group conflicts, motorized access, and wildlife are applicable.

In summary, the ACC Vancouver Section and the Federation of Mountain Clubs of British Columbia are opposed to the proposal.

Please keep me informed about further opportunities for public input on this file.

Yours truly,

Jay MacArthur