



**RE: Bridal Falls Gondola Proposal  
Application for temporary 2-year Licence of Occupation for feasibility assessment  
File #2412059**

The Federation of Mountain Clubs of BC (FMCBC) promotes self-propelled activities, such as hiking, mountaineering, trail running, snowshoeing, 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 application from Bridal Falls Gondola Corp. (File: #2412059) for a temporary 2-year Licence of Occupation to assess the feasibility of the construction of a multi-passenger Gondola project above Bridal Falls in the Fraser Valley. We have the following preliminary comments and concerns with respect to the gondola proposal:

- a) The Crown Land covered by the phase one application is extensive, encompassing the Cheam / Lady Peak and Elk Mountain / Mt. Thurston areas. These areas are already very popular with and extensively used by the public for a variety of outdoor recreation activities, including hiking, snowshoeing and backcountry skiing. With visitation numbers of the proposed gondola projected to exceed 500,000 persons per year, or over 1300 visitors per day, carrying capacity studies are necessary to assess the impact of the proposed visitation numbers on (1) the current public trail system (wear, tear, maintenance and use), (2) the current use of the areas, (3) the ecologically sensitive sub-alpine and alpine environments in these areas; and, on (4) the wildlife, which includes mountain goats, grizzly bears and cougars.
- b) Any proposed facilities, particularly the summit and backcountry commercial buildings, should be subject to an environmental assessment. The assessment should consider, among other matters, the servicing of the facilities (i.e., water, power, sewer, maintenance, communication, road access and emergency services, including fire and search and rescue), not just the physical footprint of the proposed facilities.
- c) Wildlife studies should be independent and should examine and assess the impacts of the proposed facilities and visitation numbers from a regional perspective and not limited to the proposed boundaries of the controlled recreation area. The studies need to consider the summer and winter ranges of wildlife, migration corridors between them, and the seasonal needs and vulnerabilities of the wildlife (for example, where do nanny goats give birth). An influx of visitors at certain times of the year could have negative impacts on wildlife populations.
- d) Given the extensive current recreation use of the phase one application area, outdoor recreation clubs and organizations, such as the Federation of Mountain Clubs, its member clubs in the Fraser Valley and Lower Mainland (see <https://mountainclubs.org/about-us/member-clubs/> for member club information) and the Chilliwack Recreational Advisory Group (CRAG) should be consulted regarding the existing uses, the potential displacement

of user groups should the proposed project proceed, the scope of the project and location of the facilities.

- e) We are concerned about the term “Licence of Occupation” which tends to imply that the licence holder can restrict use by the public. Please ensure that public users are not restricted from using the area except for short interruptions such as for helicopter landings. No permanent or temporary structures should be built close to any existing hiking or wildlife trails or natural features such as lakes and tarns.
  
- f) Another concern is public safety. The ridges near Cheam Peak have steep slopes that can have dangerous cornices and are not safe for inexperienced hikers, snowshoers or backcountry skiers. Making access too easy is a concern, especially in bad weather. Any proposal should have extensive review by the local search and rescue team.

If you would like clarification on any of the above comments or concerns, please contact me by email. Thank you for the opportunity to provide our preliminary comments on the application to study the feasibility of constructing a gondola above Bridal Falls.

Regards,

Barry J Janyk  
Executive Director  
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