

**RE: Compass Heli Tours Ltd.
Application for Licence of Occupation
File #22412022**

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, commercial operators and others to protect and maintain access for quality non-motorized recreation in BC's mountains and wilderness.

We have reviewed the application from Compass Heli Tours Ltd. (File: #2241202) for a Licence of Occupation to conduct multi-use adventure tourism activities in the Harrison Lake, Breakenridge, Nahatlatch River and Kwoiek Creek areas. Public recreation use of the proposed tenure areas tends to be low because they are difficult to access and they are remote. Their beauty and remoteness however are what makes these areas appealing to the public recreation users for multi-day backcountry ski trips primarily in the spring (traversing into the area from the Lizzie Lake area) and hiking / mountaineering traverses in the summer (accessed from the higher areas near the Stein). Public recreation users who make the effort to access these remote and beautiful areas would be very disappointed at seeing or encountering helicopters. To eliminate or minimize the adverse impacts of chance encounters with public recreation users, we recommend that Compass Heli Tours Ltd. be required to develop and implement an avoidance protocol, to post the protocol on the company's website, together with contact information (name, telephone number and email address) and a form, which the public recreation user can complete, providing trip dates, number of people in the party, planned route and contact information. Prior communications with public recreation users will allow the operator to proactively plan their operations to avoid interactions with such parties and minimize auditory and visual impacts, rather than simply react when the operator observes public recreation users in the tenure area.

Should the Licence of Occupation be granted to Compass Heli Tours Ltd., backcountry recreation clubs should not be precluded from building trails or huts in the proposed tenure area in the future.

If you or Compass Heli Tours Ltd. would like clarification on any of our comments or concerns, please contact me by phone or email. We would also welcome the opportunity to discuss and comment on the avoidance protocol. Thank you for the opportunity to provide comments.

Regards,

Barry J Janyk
Executive Director
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