



April 23, 2019

re: Crown Land File: #2412081 – Roadway; Disposition Transaction: 933468
Crown Land File: #2412082 –Water Line; Disposition Transaction: 933467
Crown Land File: #2412068 – Eco Tourist Lodge; Disposition Transaction: 933463
Applicant(s): Donald Worthington, Don Vanderhorst Consulting Ltd.

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 5,000 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 write regarding three applications submitted by the proponent, Don Worthington, Don Vanderhorst Consulting Ltd., in relation to a proposed wilderness lodge to be located near the top of Brohm Ridge, B.C.:

- Crown Land File: #2412068, Lease for Eco Tourist Lodge (45-year extensive use permit)
- Crown Land File: #2412081, Licence of Occupation for a roadway, extending from the end of Brohm Ridge Forest Service Road
- Crown Land File: #2412082, Licence of Occupation for a Water Line and water use from Natasha Lake

We are opposed to the granting of these three applications for the following reasons:

1. The proposed three-storey wilderness lodge, accessible by the proposed road, is within very close proximity of Garibaldi Provincial Park, a large wilderness protected area within a few hours' drive of the major population centers in southwestern B.C. The western portion of this Park is managed as an intensive, non-motorized recreation zone (i.e., hiking, mountaineering, backcountry skiing and snowshoeing). No information has been provided about the proposed activities for lodge visitors and their compatibility with the non-motorized recreation zoning of the Park.
2. While the public would benefit from improved access to Garibaldi Provincial Park, such improved access would result in heavy use of Brohm Ridge and areas within Garibaldi Provincial Park. With ease of access comes over-use, over-crowding and management challenges as evidenced at Joffre Provincial Park, which is a longer drive from the Lower Mainland. Until the short and long-term impacts of increased human use on the ecological integrity of Garibaldi Provincial Park (i.e., vegetation, wildlife and environment) are considered and planned for in an updated park management plan for the Park, we are opposed to the extension of a road above treeline.
3. The proposed lodge is entirely inside a designated ungulate winter range (UWR - #U2-002) – see [Map 1](#) and [Map 2](#). The range on the west side of Mt. Garibaldi is known as MQ-1 and extends from Cheekye River to the top of Brohm Ridge and includes Natasha Lake. The winter range is used by mountain goats and is one of largest winter ranges in the south coast region. There are two other UWR in the adjacent Clinker Ridge—WR-2 and WR-3. Summer range for mountain goats is in Garibaldi

Provincial Park, for example, the nearby Table Meadows area on the flanks of Mt. Price and The Table. It is probable that mountain goats are traveling between winter ranges in winter and that path would take them through the proponent's tenure or that of Garibaldi at Squamish (the Aquilini project, also known as "GAS"). Likewise, travel between summer and winter terrain would normally pass through proponent's tenure.

The proposed lodge and roadway extension are not compatible with the objective of preserving mountain goats due to habitat loss and sensory disturbance from construction activities, infrastructure (i.e., wind turbines) and increased human presence on and near Brohm Ridge and Mt. Garibaldi, disruption of migration patterns (summer and winter), cumulative impacts from the number of projects proposed on Brohm Ridge, and lack of detailed environmental studies of a regional nature.

Biologists are uncertain as to where mountain goats are birthing and to what extent the cumulative development proposals on Brohm Ridge will have on the animals and their very young, especially during seasonal migration. The problem with the approach taken by project proponents on Brohm Ridge is that they only study the impacts on animals within the project boundary. The GAS proposal, for example, did not look at the impacts on mountain goats during their birthing period, seasonal migration and regional impacts.

Mountain goats are extremely sensitive to noise and overhead disturbances. The presence of helicopters is a well-known harmful impact on mountain goats. The presence of wind turbines is not a known hazard but extrapolating from the generally accepted scientific literature, they would be threatened by large overhead towers with rotating blades.

4. We are concerned about the impacts on wildlife and downstream vegetation of the proposed dam and water removal from Natasha Lake, which appears to be the only substantial tarn on Brohm Ridge.

We conclude by asking that these three applications relating to a proposed wilderness lodge near the top of Brohm Ridge be denied. Ad hoc development should not be happening on Brohm Ridge, given its proximity to Garibaldi Provincial Park and the designated ungulate winter range. Rather than developing this attractive alpine ridge, extending the boundary of Garibaldi Provincial Park to include Brohm Ridge would go some way towards compensating for the extensive removal of parkland for the benefit of Whistler / Blackcomb.

Regards,

Barry J Janyk

Executive Director

Federation of Mountain Clubs of BC

www.mountainclubs.org

604.873.6096

fmcbc@mountainclubs.org