



August 11, 2020  
Squamish Lillooet Regional District  
Box 219, 1350 Aster Street  
Pemberton, BC  
V0N 2L0

Attention:  
SLRD Board of Directors  
Kim Needham, Director of Planning and Development

**Re: Whistler Sports Legacies Society/Soane – Zoning Amendment Application  
Whistler Olympic Park Seasonal Campground Use**

---

The above zoning amendment application came to our attention through our seat on the Resort Municipality of Whistler's Forest and Wildlands Advisory Committee to Council and we submit these comments as a group that has a engaged in

In relation to the application we would like to raise the following points for consideration:

**1. The Need For A Sub-Area Plan for the Callaghan Valley Should Be Addressed Prior To Supporting Any Changes In Facilities And/Or Use.**

The zoning amendment application highlights that a campsite may be considered by way of rezoning as per section 5.8.7. of the OCP for Electoral Area D.

*5.8.7 Limited tourist accommodation in the form of a lodge, RV or tent camping, or overnight cabins where directly auxiliary to an outdoor recreation use, sport training or event, may be considered by way of a rezoning.*

However, one of the preceding high-level objectives highlights the broader need:

*5.8.4 To encourage the undertaking of a sub-area plan for the Callaghan Valley overall, and to provide guidelines to regulate these existing uses until a more comprehensive plan is developed.*

This objective is repeated in relation to other Callaghan commercial property designations and we believe reflects the priority need of a sub-area plan, as repeatedly discussed by those who provided input into the Area D OCP. The need for a broader area planning process for the Callaghan was recognised prior to the development of the Whistler Olympic Park. That need has only increased as a result of this facility being built, as a result of improved access and significant changes in the volume and activities of users.

As AWARE has asserted at previous SLRD Public Hearings relating to commercial operations in the Callaghan - we suggest that a sub-area plan is needed prior to any further change in facilities and/or area use. Such a planning process should include an in-depth review of biodiversity values and not be developed solely through an anthropocentric lens. There should also be provision for projections of changes in pressures on the area in relation to climate change, recreation (volumes and user type) and population trends.

Therefore, in the absence of a cohesive Callaghan area plan we are opposed to further piecemeal development, inclusive of the proposed WOP campground.

Should the proposed rezoning application remain under consideration prior to a sub-area planning process we would suggest there is a need for:

## **2. An Assessment Of Change Of Use Of Surrounding Areas And Infrastructure**

We were pleased to see that the RV and camping site would be located on brownfield areas of the WOP site. However, we believe additional work is required to forecast the changes in user numbers and activities that could a) be reasonably anticipated but b) also emerge as unintended outcomes of the addition of a campsite to this area.

At a minimum this assessment should include

- Information on trails and activities WOP will be recommending to guests along with corresponding impact evaluations and mitigation strategies,
- Strategies for avoiding illegal camping if people arrive to find the site full (as is being seen with existing official camp spots),
- Information on anticipated guest education needs and details on how WOP will ensure positive stewardship messages on a range of essential topics. This should include how they are integrating recognised best practice and will sustain education long-term. This information should be inclusive of strategies for a diversity of guests who for example: may have little backcountry experience; limited wildlife awareness or who may not communicate in English/French.
- Measures that will be in place to avoid adding pressure to stretched education, management and enforcement bodies such as BC Parks, Conservation Officer Service, etc

## **3. Greater Clarity On Managing Increasing Potential For Human-Grizzly Bear Conflict**

AWARE was one of a number of concerned parties that pushed (successfully) to reduce the scale of the WOP development recognising the value of the Callaghan to threatened local grizzly bear populations. As a result of further research and greater understanding of local grizzly bear populations the importance of this area has become more apparent especially to females and cubs (which is especially important to recovery efforts because female reproduction is slow and cub mortality high at over 50%).

The reason for safeguarding the habitats and needs of grizzly bears is that they are an indicator species and umbrella species of the health of wilderness areas. If we have healthy grizzly bear populations this indicates there is a diversity of seasonal forage and habitats, safe spaces away from disturbance to raise cubs and safe corridors between populations. The presence of interconnected healthy 'wild' spaces is also the key to the survival of a huge diversity of other species.

As the SLRD, Squamish Nation, Lil'wat Nation and Sea-to-Sky local governments all passed resolutions to support efforts to protect and recover local threatened grizzly bear populations we would suggest that the applicant provide greater clarity on plans for eliminating the likelihood and managing incidences of human-bear conflict. This information should be shared prior to any rezoning and not just relate to campground facilities but to guest use of the Callaghan area and should be based on the knowledge and best practices of credible grizzly bear experts. To this effect we fully echo and support the recommendations made by the Coast to Cascades Grizzly Bear Initiative in relation to the proposed rezoning application.

In addition to the above, we share the concerns raised by others relating to wildfire and potential for increased fire risk based on the high proportion of wildfires started by humans. In addition to being a threat to communities, wildfires can clearly have catastrophic impacts on wildlife and habitats.

We thank you for your consideration of our comments.

Kind Regards,



Claire Ruddy, Executive Director

Association of Whistler Area Residents for the Environment (AWARE)

**From:** [Graham Haywood](#)  
**To:** [Alix MacKay](#); [Kimberly Needham](#); [Tony Rainbow](#)  
**Subject:** FW: \*\*\* External \*\*\* Hearing on WOP Campground  
**Date:** August 11, 2020 7:43:11 PM

---

Please see the written submission received during the PH.

Regards,  
Graham



**Graham Haywood**  
**Interim Director of Legislative and Corporate Services**  
[ghaywood@slrd.bc.ca](mailto:ghaywood@slrd.bc.ca)  
P: 604-894-6371 x229  
F: 604-894-6526  
1-800-298-7753  
[www.slrd.bc.ca](http://www.slrd.bc.ca)

*This message is intended only for the use of the individual or entity named above, and may contain information that is privileged, confidential or exempt from disclosure under applicable law. If you are not the intended recipient or their employee or agent responsible for receiving the message on their behalf, your receipt of this message is in error. Please notify us immediately, and delete the message and any attachments without reading any such information. Any dissemination, distribution or copying of this communication by anyone other than the intended recipient is strictly prohibited. Thank you.*

**From:** Steven Jones [REDACTED]  
**Sent:** Tuesday, August 11, 2020 7:34 PM  
**To:** Graham Haywood <GHaywood@slrd.bc.ca>  
**Subject:** \*\*\* External \*\*\* Hearing on WOP Campground

Hello,

I am writing in **opposition** to this proposed campground for the following reasons:

**1) I am concerned that such a proposal could proceed without requiring a proper assessment of the potential impact on a sensitive Grizzly Bear population.**

The Master Plan for Whistler Olympic Park notes that:

"The Sea to Sky Land Use Management Plan resource maps identify the majority of the lower Callaghan Valley as a medium grizzly bear/wolverine management priority area..."

The Coast to Cascades Grizzly Bear Initiative notes that:

"If the Squamish-Lillooet grizzly bear population grows it could over time help the Garibaldi-Pitt, Stein-Nahatlatch and North Cascades grizzly bears recover and thrive. Thus, ensuring good connectivity across the Highway 99 corridor between the growing communities of Squamish, Whistler and Pemberton is crucial."

This is a critical population within the broader context and it only has approximately 59 bears.

The Coast to Cascades Grizzly Bear Initiative also notes that:

"Like their neighboring populations, Squamish-Lillooet's 59 grizzly bears move with the seasons – relying on the valley bottoms for salmon in the fall, or critical plants in the spring before snow melt in lush alpine meadows and avalanche tracks."

Neighbouring jurisdictions are treating threats to Grizzly Bears very seriously.

RMOW has done excellent work in this regard including periods of full trail closures when conflicts arise.

In Callaghan Lake Provincial Park the policy is: "To protect active grizzly bear habitat and to avoid human-wildlife conflict, camping anywhere else within the park (including all lake shore camping) is not permitted."

In the Callaghan Conservancy: "No wilderness, backcountry or walk-in camping is permitted in this conservancy."

The government webpage for the Upper Soo Conservancy notes that: "Upper Soo Conservancy was established as part of the Sea to Sky Land and Resource Management Plan area. This conservancy includes an old-growth forest ecosystem and protects winter range for mountain goat and deer, and important habitat for grizzly bears."

It is unfathomable that the SLRD would consider introducing new overnight camping into this area without requiring a full wildlife assessment when the agencies responsible for neighbouring jurisdictions are taking such aggressive action to protect this vulnerable population. It is my opinion that an assessment should not simply be a condition placed on approval of this project. I believe that an assessment must be completed prior to a public hearing on the project.

**2) The continued erosion of public access to public land**

The Master Plan for WOP stated that:

"VANOC/WLS will not unreasonably refuse to allow individuals to pass freely through the tenured area for the purposes of a public recreation or other activity."

The Master Plan also acknowledges the existence of the Madeley Lake Rec Site.

In 2012, an amendment was made to the management plan.

<https://backcountrybc.ca/component/docindexer/?task=download&id=1217>

That ammendment included:

"Public "Motorised and non-motorized" access and continued use of the Madeley Road within the lease area from snow out to snow in (summer access) will now be managed by WOP who will continue to provide access heading north and south on the Madeley Road to lands / trails beyond namely the Madeley and Rainbow trail systems. (This will ensure as per Section 56 / that all reasonable public access will be maintained)"

Unfortunately, that has access has now been gated. At the same time, motorized road access continues within the Whistler Olympic Park.

From Whistler Photo Safaris Ltd.:

"BEAR SAFARIS IN WHISTLER OLYMPIC PARK

The park is home to a large population of black bears and we can view them from a distance in the safety of the vehicle. We will search for bears foraging for their meals in spectacular back-country scenery. Experience the park like it's your own private oasis."

I have also heard that WOP is now charging backcountry skiers a fee to simply cross through their land to access neighbouring land during the winter. I feel that this is against the spirit of the master plan.

It is not right for WOP to block access to an existing volunteer-maintained campground and to then attempt to operate a private commercial one instead. Until the dispute re access to the pre-existing public campground is resolved, this proposal should not proceed.

Sincerely,

Steve Jones

[REDACTED]  
[REDACTED]