

SLRD Board of Directors
Squamish Lillooet Regional District
PO Box 219, Pemberton, B.C., V0N 2L0

August 8, 2020

Re: Whistler Olympic Park Zoning Amendment Application

Currently there is a shortage of legitimate camping spaces in the Whistler area. As the location for the proposed tenting and RV sites has already been altered from its natural state, minimal environmental impact will occur. Adding more spaces will be a benefit and hopefully it will reduce illegal camping in the Whistler area.

However, there is growing concern from the public that Whistler Olympic Park (WOP) has blocked public driving access to Madeley Lake. For decades the Madeley Lake road has provided access to Madeley Lake for a variety of outdoor recreation activities including canoeing, kayaking, stand up paddle boarding, fishing, camping, hiking, and it is the main road access to the Madeley-Rainbow Lake trailhead. While it is still possible to access these areas on foot, it adds approximately 4 KM each way. Which is an insurmountable distance for anyone wanting to take personal watercraft, such as kayaks, to Madeley lake. It also makes the previously reasonable day trip to Hanging Lake on the Madeley Rainbow trail a much more challenging outing.

At a time when all forms of backcountry use are dramatically increasing every effort should be made to maintain or increase public access to the backcountry not to close it off. Impeding public access to one area only moves the problem to a different area. At a time when many areas of the backcountry are at or near capacity it is imperative that we do not lose any existing access points.

It is disturbing that a commercial operator is once again blocking or impeding public access to crown land. Several years ago, when WOP and Callaghan Country were fighting over control of the Madeley Lake area for cross country skiing, the proposed solution was to remove the FSR designation from the Madeley Lake Road. At the time I called Scott Shaw McLaren from Forest Lands and Natural Resource Operations and expressed my concern that this may lead to the public being prevented from getting to Madeley Lake. Scott assured me that public access to Madeley Lake would always be available via the road. This clearly is not happening. Once again, the public are being prevented from accessing crown land by a commercial recreation operator. This is a disturbing trend.

From recent media stories and online posts, such as the misuse of Lake Lovely Water, it is blatantly evident that there is a growing segment of society that has a great sense of entitlement that they take to mean they can do whatever they want in the backcountry with complete disregard for the environment and they believe someone else will clean up their mess. Or worse yet, they are too ignorant to understand that they have behaved inappropriately. This needs to be stopped before one group of people ruin the backcountry for everyone. A coordinated education campaign by such organizations as Leave No Trace, Adventuresmart, the Alpine Club of Canada, the B.C. Mountaineering Club, VOC, and Destination B.C. could ideally reverse this trend. The social media platforms that have to

a great extent fueled the dramatic increase in backcountry use, could be used to spread the message regarding appropriate backcountry etiquette.

Rather than preventing or impeding public access to the backcountry, every effort should be made to maintain or improve access. I am confident that through collaboration with the public and outdoor groups that a workable solution to this issue can be achieved and public driving access on the Madeley Lake road can be restored.

Bryce Leigh

[REDACTED]

[REDACTED]



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August 10, 2020

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via email planning@slrd.bc.ca

Attention:
Kristen Clark
Interim Chief Administrative Officer

Kim Needham
Director of Planning and Development

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

Further to my letter of 26 May 2020, I am writing now to provide further detailed analysis and comment on SLRD Zoning Amendment Bylaw No. 1673-2020 (Whistler Olympic Park).

Thank you for the opportunity for the Resort Municipality of Whistler ('RMOW') to provide input on this application ('WOP') as part of the Public Hearing, which is an important step in the public engagement process to hear from broad community interests and consider how unintended consequences may be proactively managed through the process of a rezoning.

To provide input to this detailed analysis and comment, the RMOW referred the application to its Forest and Wildland Advisory Committee (FWAC) and Whistler's Bear Advisory Committee (WBAC), as well as internally to relevant RMOW departments. In addition to the broad community interests, these groups represent organizations such as the RCMP, GFL Environmental (previously Carney's Waste Systems), BC Conservation Officer Service, Coast to Cascades Grizzly Bear Initiative and Association of Whistler Area Residents for the Environment (AWARE).

The proposal is adjacent to RMOW boundaries and is identified as an important resource that includes high wildlife and ecological value. Whistler residents have a vested interest in understanding how the proposed rezoning will impact wildfire management, Alpine trail use and maintenance, and wildlife



including Grizzly Bear habitats, traffic management and finally, how this proposal fits into an overall plan for the area.

The municipality is also concerned about the precedent setting potential of this rezoning in the absence of a larger Callaghan Valley recreational plan. We refer to the Sea to Sky Land and Resource Management Plan ('LRMP') which is to provide greater certainty for local economic development and the long-term sustainability of ecological, social and cultural values in the Sea to Sky plan area. The LRMP identifies a management direction for *"the Province and First Nations to develop a joint Recreation Management Plan for the Callaghan Valley, outside of protected areas,"* and to not issue any *"new commercial recreation tenures until a study is completed to support the Recreation Management Plan."*

Following a more thorough review of the proposal and broader referral to interested parties, there are a list of questions that the RMOW believes have yet to be addressed, and as such, they are outlined below together with some recommendations to consider.

When will a holistic Callaghan Valley Area land use plan, or a Recreation Management Plan be developed?

RMOW has a number of concerns with the proposed development, the most important being that regardless of the merits of the current proposal, a sub-area plan of uses in the Callaghan Valley, as called for in the Electoral Area D Official Community Plan, has not been completed, nor have any guidelines been provided to regulate existing uses, which is an essential reference to reviewing permanent proposals of this type for accommodation uses.

The Electoral Area D Official Community Plan ('OCP') identifies Settlement Patterns, and of particular relevance, makes reference to, *"nodes of activity based mainly around commercial tourism, both frontcountry and backcountry. The Callaghan Valley is one such node that has been identified as an important resource that includes high wildlife and ecological values, as well as high recreation values, and established recreation facilities. It is intended that in the future the Callaghan Valley will be the subject of a planning process to develop a sub-area plan to address the unique characteristics and needs of the Callaghan Valley."*

I also refer to Land Use Designations in the OCP, under section 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.'*

To our knowledge, a *Recreation Management Plan* as identified in the *Sea to Sky Land and Resource Management Plan* has also not been completed. The proposed rezoning reflects an incremental approach that can be expected to lead to requests for additional supporting amenities and services – and may have unintended consequences which have not yet been fully considered and planned for. Accounting for and balancing existing and future recreational, economic and environmental values is critical. Prior to the



approval of developments of this nature, RMOW anticipates a collaborative planning process in the Callaghan Valley area which holistically plans from the entrance of the valley at Highway 99 to the top of the watershed, a portion of which is within RMOW boundaries.

Additionally, with one proposed application will come another, and it is important that this planning happens sooner rather than later.

What is the Wildfire risk management plan?

I reiterate our agreement with Regan Kohlhardt, Planning Section Head, BC Parks, Sea to Sky/Sunshine Coast Areas comments that the “New campgrounds also bring with them the risk of wildfire. BC Parks is concerned that a campground near Callaghan Lake Park and the two adjacent conservancies, Callaghan Conservancy and the Upper Soo Conservancy, will heighten the risk of wildfire in BC Parks.”

Wildfire is one of the most significant threats to RMOW and this proposal is particularly concerning given its proximity, distance from Fire Response teams, intended summer use including “fire pits” and “barbeque areas” associated with 46 campsites and the addition of an overnight summer long population of approximately 150 campers (most wildfires are human caused). Loss of life is our number one concern with any wildfire threat. The Whistler community also has billions of dollars in public and private infrastructure that could be impacted by a wildfire originating in this location.

The SLRD Staff Report of June 24, 2020 indicates that with respect to wildfire concerns, the SLRD Campground Bylaw No. 1568-2018 sets out the requirement for a detailed fire protection, safety, and emergency management plan to be developed for new campgrounds within Electoral Area D. It indicates that the applicants will be required to develop these plans, and the safety plan must include details on how fire pits and campfires will be managed, especially during provincial fire bans. This defers these important considerations which should be considered and addressed at this stage, including the greater potential for wildfire in the area through increased usage and wildfire emergency response.

What is the Wildlife protection and management plan?

Grizzly bears have been tracked by the province in the Callaghan valley for over a decade. The bears are active in the WOP area and surrounding mountains including sightings in recent years very near the day lodge. Given that both the SLRD and RMOW have passed resolutions to support grizzly bear recovery, activities in the area must support grizzly bear recovery. If the campsites are to be approved, it is recommended that WOP undertake an assessment by a credible grizzly bear expert prior to development, of grizzly bear use and risk factors that identifies methods for reducing the potential for conflict including site layout, waste management and public education.

The proposal for an RV campground will bring in more visitors and traffic driving up the Callaghan Road. With the high number of bears foraging along the roadside in the springtime, there is concern about



human bear conflict as more people stop on the road, or worse, go out hiking to actively look for bears. This has been identified as a growing concern. A comprehensive Callaghan Valley access management plan would enable a thorough consideration and addressing of all potential consequences.

Education, waste management and interpretation for visitors should be included in the proposal to address wildlife interactions and minimize opportunities for conflict.

What is the Emergency Response plan?

Emergency response procedures should also be included to address a range of natural hazards, including fire, flood and earthquake. The existing Whistler Olympic Park emergency plan likely has this, but would require updating to identify the proposed change in land use, with camping facilities. It is expected that this would be addressed through the rezoning process.

What sewer and water plans have been provided?

The Vancouver Coastal Health Authority has provided a detailed response concerning the provision of drinking water, sewerage, sani-dump and greywater. As noted in the response, information has not been provided regarding the proposed design or placement of these new facilities and the connection to existing facilities. It is the RMOW's view that design feasibility of providing these services and requirements should be considered through the rezoning process to ensure appropriate access to services and prevention of unintended consequences to surrounding areas.

How will appropriate resources be allocated to and manage this additional use?

With additional numbers of people in the area, this will drive additional need for more management and enforcement resources, and with Conservation Officer Service already under pressure and under-funded, who will perform this function?

RMOW does provide park ranger services on the Sproatt and Rainbow mountains trail network, but does not provide services in the Callaghan valley, and therefore, resourcing for the Callaghan valley area is required to be established to take a proactive management approach, rather than react to a future situation which may be difficult to reverse.

We further note our concern about the recent gated closure of the Madeley Lake Recreation Site. This decision made by WOP directly limits public access to a joint RMOW / RSTBC hiking trail, also contributed to by local not for profit groups, and does not provide sufficient parking provision at this location. This decision was implemented without coordination of stakeholders, and has reduced available recreation opportunities at a time of significant importance to public health. This may also have the unintended consequences of dispersing vehicular traffic to other already over-crowded areas adding additional capacity pressures to neighbouring recreational areas such as those in Whistler.



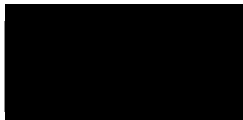
It is appreciated that the recent significant increase in level of use in this area, and poor behaviour of users regarding waste and other activities, may be cause for concern, and contribute to decisions such as this, but this is the reason that proactive management, coordination with all stakeholders and identification of appropriate resources, are required with a Recreation Management Plan as identified in the Sea to Sky Land and Resource Management Plan, and with a sub-area plan of uses as outlined in the Electoral Area D Official Community Plan.

Summary

Regardless whether additional recreational opportunities in the region may be desired and/or appropriate, and the need for WOP to maintain and sustain operations with a range of revenue streams, there is not yet a plan that would consider how this proposal, and future subsequent proposals from other applicants, can be managed holistically.

Approving this application without consideration of the overall plan for the Callaghan Valley at this time seems premature.

Sincerely



Toni Metcalf
General Manager, Resort Experience

cc:
Virginia Cullen, Chief Administrative Officer, RMOW
Mayor & Council, RMOW

From: [Kimberly Needham](#)
To: [Alix MacKay](#)
Subject: FW: *** External *** Public Hearing: Bylaw No. 1673-2020
Date: August 11, 2020 4:07:18 PM
Importance: High

PH



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From: Planning
Sent: Tuesday, August 11, 2020 4:07 PM
To: Kimberly Needham <KNeedham@slrd.bc.ca>
Subject: FW: *** External *** Public Hearing: Bylaw No. 1673-2020

From: Aleksey Nozdryn-Plotnicki <[REDACTED]>
Sent: August 8, 2020 6:05 PM
To: Planning <planning@slrd.bc.ca>
Subject: *** External *** Public Hearing: Bylaw No. 1673-2020

SLRD Board of Directors,

Broadly I support continued expansion of commercial operations at Whistler Olympic Park under the condition that the public not lose access to the backcountry as a consequence.

I am a happy patron of the cross-country ski trails a couple of times a season, especially those further afield to Callaghan and Madeley Lake. Paying to park for the winter Hanging Lake trail is irksome, but acceptable.

What is not acceptable is summer time gating of the Madeley Creek FSR and any legal position that ticketless visitors beyond are trespassing. This is a seriously aggressive move against the public, and could certainly be interpreted as a COVID timed land grab. WOP have shown themselves not to be reliable partner.

I think summertime access to the Madeley Lake FSR should be returned.

I think some requirement to maintain the Madeley Lake FSR should be considered.

I think that a free access corridor/option to the winter Hanging Lake trail from the Alexander Falls Rec Site parking should be considered.

Especially given the gating of Madeley Lake FSR, it should be considered to place a special requirement to rebuild and maintain the Beverly Creek bridge that has washed out on the Rainbow-Madeley Lake Trail

When considering these options, it should be emphasised that returned summertime access to the Madeley Lake FSR should not be seen as a concession on the part of WOP. Public access was and is the status quo, and the gating is a recent wrong action that is simply waiting to be corrected.

As a resident of the Whistler Cay, the Rainbow Lake area and 21-mile drainage are an important part of my back yard and to be denied access to the connecting areas in the Callaghan Valley backcountry both negatively impacts me, and is entirely unnecessary.

Sincerely,

Aleksey Nozdryn-Plotnicki

[REDACTED]
[REDACTED]
[REDACTED]

From: [Kimberly Needham](#)
To: [Alix MacKay](#)
Subject: FW: *** External *** Whistler Olympic Park- Zoning Amendment for Campground
Date: August 11, 2020 4:04:24 PM
Importance: High

For the PH



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From: Planning
Sent: Tuesday, August 11, 2020 3:58 PM
To: Kimberly Needham <KNeedham@slrd.bc.ca>
Subject: FW: *** External *** Whistler Olympic Park- Zoning Amendment for Campground

From: Doug Wylie <[REDACTED]>
Sent: August 6, 2020 10:13 AM
To: Planning <planning@slrd.bc.ca>
Cc: edit@pique-newsmagazine.com
Subject: *** External *** Whistler Olympic Park- Zoning Amendment for Campground

To Planning Department - SLRD,

I am writing regarding the proposed rezoning to create a campground facility at the Whistler Olympic Park. My concerns are not with the creation of the campground itself but with the growth in summer recreational activities that this will enable and the impacts on public access to Madeley Lake.

It has come to my attention that the WOP has gated the access road to Madeley Lake this summer. This has effectively cut off public access to the lake and the trail to Hanging Lake and Rainbow lake. Such a summer gate closure can only be to enhance the activities existing or proposed by the Olympic Park but it effectively cuts off a historic public access to crown lands.

In the early 1980's Don MacLaurin and I flagged and slashed the route to Hanging Lake. This trail was originally roughed in by a forestry crew in the 1960's. After that the Rotary Club of Whistler built the trail

into a usable standard. It has been a popular route to the Rainbow/Sproatt area ever since. The Madeley Lake has always been used by fishers and others for decades. This road is not very steep and remains passable to most vehicles.

This gating of a popular access to an alpine area is an example of a growing problem in the region. Over the years, as logging has declined, numerous forestry roads used by the public have deteriorated to the extent that they are no longer passable to even 4wd pickups. Also private industrial and recreation businesses have further limited access. Singing Pass and Black Tusk are just two local examples.

I urge the region to take into account the actions of gating this road by the WOP when considering approval of additional summer activities in their tenure. Excluding public access to crown lands should not be allowed to continue if approval of a rezoning for a campground is contemplated.

Yours truly,

Doug Wylie, [REDACTED]
[REDACTED]

From: [Kimberly Needham](#)
To: [Alix MacKay](#)
Subject: FW: *** External *** Fw: Whistler Olympic Park Medeley Lake Road and WOP Zoning Amendment Application Bylaw no.1350-2016 Amendment Bylaw 1673-2020
Date: August 11, 2020 4:06:20 PM
Importance: High

PH comments



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From: Planning
Sent: Tuesday, August 11, 2020 4:04 PM
To: Kimberly Needham <KNeedham@slrd.bc.ca>
Subject: FW: *** External *** Fw: Whistler Olympic Park Medeley Lake Road and WOP Zoning Amendment Application Bylaw no.1350-2016 Amendment Bylaw 1673-2020

From: Michael Blaxland <[REDACTED]>
Sent: August 7, 2020 3:10 PM
To: Planning <planning@slrd.bc.ca>
Subject: *** External *** Fw: Whistler Olympic Park Medeley Lake Road and WOP Zoning Amendment Application Bylaw no.1350-2016 Amendment Bylaw 1673-2020

From: Michael Blaxland
Sent: Friday, August 7, 2020 2:40 PM
To: danielle.Cunningham@gov.bc ; planning@sird.bc.ca ; Doug Wylie ; Patrick McCurdy ; Bryce Leigh ; Ken Martin
Subject: Whistler Olympic Park Medeley Lake Road and WOP Zoning Amendment Application Bylaw no.1350-2016 Amendment Bylaw 1673-2020

To the Government of British Columbia and SLRD Board of Directors

The Alpine Club of Canada Whistler Section ("ACCW") has no objections to Whistler

Olympic Park (“WOP”)needing to develop commercial operations as a revenue source to cover expenses at this wonderful facility. IF the proposed seasonal campground is where indicated near the Day Lodge and beside the Ski Jump (as stated in the advertisement found at page 35 of the Pique) , ACCW has no objections and supports the Amendment. However it does not appear to be an appealing camping location in comparison to other lakeside or riverfront local camping options. ACCW objects if the location was to be on the lake adjacent to the WOP lease namely Madeley lake.

The Alpine Club of Canada Whistler Access Committee has a general concern as to the lack of hiking access to the alpine in the Whistler area. ACCW has over 300 members who are local hikers.Many of us note the closure of Joffre Lakes and restrictions on the big 3 access points to Garibaldi Park has increased the demand on all other area hiking trails. One alternative to Garibaldi Park is the Callaghan Valley and the Madeley Lake trail to Hanging Lake and Rainbow. The Yellow gate at the start of the Madeley Lake FSR which provides public access to fishers, campers and hikers has been locked. It appears to be locked by Whistler Olympic Park. The Rotary Clubs of Whistler built the improved Madeley Lake trail. Many locals object to the extra plus 5 km walk to the trail head caused by no longer being able to drive on a public Madeley Lake Forest road to the trailhead.

We have heard rumours WOP has given an exclusive contract to a private operator to do bear tours. Another rumour is WOP wants an exclusive campsite to reduce forest fire risk caused by irresponsible campers using the public Medeley Lake campsite.The reality is the public is being excluded by WHO from access to public lands without any chance for prior review by the public. If this Amendment is in any way being used to justify an exclusive campground at Medeley Lake or to justify the closure of the yellow gate on the Medeley Forest Road ACCW is opposed

Our research indicates the WOP lease is on an ongoing basis for both amateur sports and “the general public for recreational activities”(s4.1(g)WOP lease). WOP does not have exclusive use and we request the Province make WOP unlock the yellow gate at the start of the Medeley Lake road ASAP. Any campsite should be limited to the subject lands indicated on the map for Amendment Bylaw 1673-2020.

Michael Blaxland Chair ACCW Access Committee