

Valhalla Wilderness Society

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Comments on the Application for Heli-Ski Tenure on Battle Mountain in the Incomappleux Wilderness File # 4405291

Please note that the Valhalla Wilderness Society (VWS) reviewer owned and operated a cat-skiing operation and backcountry lodge for sixteen years, and that others contributing to this review are also skiers. We have all experienced the pleasures of backcountry cabins in winter, and we all recognize skiing as one of the more sustainable and least damaging industries in BC, depending upon the size, location, and density of operations.

Summary

Any kind of outdoor activity pursued to excess can be very harmful to the environment. This proposal overlaps five other heli-ski tenures and two existing lodges in or near the upper Incomappleux. There are other heli-ski and cat-ski operations, as well as other lodges, in the Central Selkirks. As a result, this proposal raises, not only its own potential impacts, but the amplified cumulative impacts upon wildlife and other recreational users that would result. It raises the subject of the carrying capacity of the mountains to sustain this level of use and still maintain something like their full spectrum of wildlife (given that the mountain caribou is mostly gone from some of these ranges.) Lastly, it raises the subject of whether MFLNR has any sort of goal to maintain wildlife species, or even to keep recreation and tourism at a level that doesn't become self-destructive of the quality of experience offered by the operators.

The area of this proposal is a defacto wilderness, the Incomappleux Wilderness. It has long played a critical role supporting the survival of the grizzly bear population that uses Glacier National Park. In a 1984 report, Environment Canada recommended that it receive special protection for this purpose. This wilderness also likely has blue-listed wolverines, as well as mountain goats, which are sensitive to disturbance. It is possibly mountain caribou winter habitat. While it is true that surveys have not noted caribou north of Pool Creek in the Battle Range in recent times, the Westfall Valley contiguous with this proposal is known mountain caribou habitat and set aside for that purpose.

We trust that biologists at the MFLNR are aware of research showing that blue-listed wolverines abandon their dens and move their kits when they are in the least disturbed by humans in winter. Mountain goats flee from helicopters, using levels of energy that can be replaced only slowly, if at all, in the mountain winters, jeopardizing their survival. Mountain caribou have been tragically displaced from the best winter habitat by helicopters and snowmobiles. And grizzly bears can be disturbed when they emerge from their winter dens if skiing is still going on.

VWS does not believe that the proposed lodge will be a winter-use only lodge for very long. The proponent's spectacular Icefall Lodge on the edge of Banff National Park has summer use. And Icefall Lodge is an excellent example of a successful business that seeks to multiply into another heli-accessed lodge and heli-skiing base elsewhere.

Across BC we have a situation of exponential growth in commercial recreation, and especially in backcountry lodge/helicopter combinations. So far as we know, there is no formal policy showing when or how to control or restrict it. This explosive growth was experienced in Europe. It caused so much harm to wildlife, other recreational users and communities that France, Germany and Liechtenstein have ousted heli-skiing from their whole country. Austria has strictly limited landing places in Tyrol to two and landings are not permitted on weekends. Switzerland, where no controls exist, has 42 official landing places, and citizens have been trying to get it banned for 20 years, to no effect.

One cause of this explosive growth was that helicopter/lodge operations employ young people who become skilled and soon want their own operations. An oversupply of helicopter businesses drove prices down and usage up. Our contacts in Europe state:

“Wildlife is threatened by heli-tourism: noise-exposure causes stress and hence, animals try to escape. But in winter, food-resources are scarce and it is quite possible that debilitated animals die because of helicopters. Helicopter-movements are difficult to predict for animals because speed and directions change quickly. Additionally, helicopters fly near to the ground and often, they appear suddenly from behind ridges, which leads to some bad surprises for animals. In spring time a lot of animals rear their offspring - and they react very sensible to any kind of disturbance. In the worst case, they abandon their offspring. And besides wildlife, any alpinist who accesses the mountains by fair means is disturbed by helicopters.”

We appreciate that in BC considerable winter habitat for mountain caribou, called Ungulate Winter Range (UWR), has been set aside from logging. However, mining, hydroelectric development and tourism development were exempted from being restricted by these zones. Restrictions on snowmobile use have been very few, and the spread of heli-skiing businesses seems to have no restrictions.

Where is there any wildlife survey required? Where are there any carrying capacity studies? Where are there any limits on the density of operations?

Like all heli-skiing companies, Icefall Lodge applicants promise that they will follow BC guidelines and avoid these wildlife species. Viewing the Wildlife Guidelines for Backcountry Tourism/Commercial Recreation in British Columbia (2006), these guidelines are meant only for permit holders and place no limitations on the number or location of tenures. Homilies such as “record wildlife encounters”, “do not harass wildlife”, “use consistent flight patterns” will mean little if the government stacks on so many tenures that the helicopters and wildlife have nowhere to go to get away from each other.

Does the Ministry know how many mountain goats use the tenure area? Does it know their preferred locations according to season? Does it know how many flights already go up and down the mountains on an average day, and where? When five or six different companies are looking for fresh snow every day, is there any room for the priorities of the mountain goats?

Helicopters bring human habitation into wilderness areas and have serious impacts on grizzly bears, and no doubt wolverines. Whether or not there are grizzly bears in the future will depend a great deal on how much development and intrusion of people is allowed in these mountains. The government recently dealt a staggering blow to grizzly bear survival in the Purcell Range by approving the Jumbo Resort.

We count at least 11 lodges held between the Icefall Lodge and the five helicopter / back-country lodge businesses already existing in the Incomappleux area, although most of these are in more distant

mountains such as the Rockies and the Cariboo. But in the Central Selkirks there are, as well, Revelstoke Cat Skiing which operates not far away; Great Northern Snowcats operates at Trout Lake, equally nearby; and Selkirk Wilderness Skiing, another cat-skiing operation, has a big lodge on Meadow Mountain, a little further away.

What areas have been set aside as winter sanctuaries from the noise and disturbance of machines and people during the winter? Some of the lodges whose websites we've perused obviously value the wildlife in their tenure a lot. It is a drawing card for their clientele and a big factor in the quality of the experience provided. The wildlife travelling through these tenure areas flow from intact, remote places like the Incomappleux Wilderness. As fewer and fewer places are left undisturbed, there will be smaller wildlife populations, fewer and fewer sightings by customers of existing businesses. Similarly, the skiing experiences become no longer a wilderness experience. Too many tenures begin to undermine the quality of experience for all.

Six overlapping heli-skiing tenures would certainly be very unfair for noncommercial recreationists. The Incomappleux Wilderness is very wild and remote, yet noncommercial wilderness hikers, climbers, backpackers and skiers do use it.

VWS is also deeply concerned about the virgin rainforest that begins on the lower slopes of Glacier Creek. The owner of the Mountain Hostel listed this forest on his posters to attract clients. The owner was never a more-is-better, or bigger-is-better person when it came to his lodge business. But we are deeply concerned about a new business coming in and expanding the Mountain Hostel.

The forest is an antique Inland Temperate Rainforest that abounds with rare species and species at risk, including a treasure trove of rare lichens, a blue-listed moss and the red-listed Mountain Moonwort, a tiny, primitive fern dating from a period shortly after the glaciers receded. VWS and other groups that have worked to protect this forest believe that it is a world heritage, and it certainly is a very public recreational resource.

Members of the public have poured in thousands of dollars to fund scientific research and raise public/government awareness of this now-renowned forest. We have funded research that government never contemplates funding. Work parties of numerous volunteers have kept open the road and improved the game trail in the forest for public safety. We believe that it is important for people to have opportunities to experience this forest. Yet we are also aware that if the forest were ever protected, there would need to be some kind of management approach to avoid overuse.

VWS is deeply concerned about the prospect of increased numbers of high-paying, easy-access commercial users so close to the Incomappleux forest. We are also concerned about the government's propensity to give private operators control over their tenures, to build such things as trails.

Much of the upper Incomappleux River is in a major park proposal, the Selkirk Mountain Caribou Park Proposal. The ten environmental groups supporting this proposal have always hoped that the road access could be made a little better than it currently is, so that more people could visit the forest; but not so good as to swamp the forest with visitors. We think the matter of access ought to be turned over to BC Parks or Parks Canada, with input from the scientists, environmentalists and recreationists who have worked to protect it. Several of these organizations have agreed that a trail should never be built completely through the forest and into the grizzly bear/avalanche track territory.

The Proponent's Management Plan

There is a discrepancy between the location of the proposed new lodge shown on the proponent's map, and the GPS coordinates of the location given in the management plan. The government should, in our opinion, post a revised application with the correct GPS coordinates.

The plan says the new lodge to be built is at 1,572 m. on the north side of Battle Mountain. However, the GPS coordinates provided in the management plan indicate a location down low, near the Incomappleux River. For the purposes of this review, we assume that the 1,500 m. elevation for the lodge is correct. This is in the headwaters of a creek shown unnamed on recent maps, but historically named Glacier Creek, which is what we will call it in this review. *If the proponent is considering any development near the river or the road, such as a helicopter landing or fuel depot, the public should know that in making their comments.*

The wildlife/species at risk section of the proponent's plan does not seem to stem from a habitat survey or on-the-ground knowledge and does not offer any details of the location at all. For instance, the proponent says it will stay away from grizzly bear and wolverine dens, but has anyone inspected the site for such dens? Wolverines have been known to move their dens if they see people within a couple of kilometers of their den sites. The guidelines for staying away from dens act for all the world as if the animals inside of them do not move around outside the dens. Putting a lodge in a grizzly bear denning area or a grizzly bear travel corridor should be avoided at all costs.

The Incomappleux Wilderness as a Grizzly Bear Refugium Connective Corridor and Buffer Zone for Glacier National Park

The Incomappleux Wilderness is a roadless area beyond the logging roads in the upper Incomappleux watershed. When Glacier National Park was created, the headwaters and 18 kilometres of the uppermost Incomappleux River received protection. But the lower elevations, which had a large expanse of primeval Inland Temperate Rainforests of very great antiquity, received no protection. Two-thirds of the length of the lower river were logged. Grizzly bears and other wildlife lost an immense amount of intact low-elevation spring habitat, and the invasion of logging roads, which today are overrun by ATVs in bear hunting season, have no doubt taken a toll.

But between the upper end of the clearcuts and Glacier National Park, there are now about 15 kilometres of river flowing through what is still intact, defacto wilderness. A stand of virgin Inland Rainforest, with trees up to 1,800 years old, still stands along 5 kilometres of this part of the river, starting at Glacier Creek.

A number of tributary creeks to the Incomappleux Valley also remain unlogged or largely so (with some valley-bottom clearcuts), greatly extending the wilderness on both sides of the valley that is available for grizzly bears, wolverines, mountain goats and endangered mountain caribou. Such is the case of Battlebrook, Glacier and Kellie Creeks on the east side of the valley. Boyd Creek, which has some relatively recent road and cutblocks, is still fairly important to these animals, as it connects to critical habitat in the Westfall River on the Duncan River side of the mountains. Above Glacier and Kellie Creeks stands Battle Mountain, a very important part of this connective corridor. The Valhalla Wilderness Society has included much of the Incomappleux Wilderness in its Selkirk Mountain Caribou Park Proposal, encompassing 37,354 hectares of the Incomappleux watershed.

Grizzly bears, wolverines, mountain goats, and endangered mountain caribou are all present in Glacier National Park, and can be assumed to be present throughout the Incomappleux Wilderness. During the 1980s Environmental Canada did a wildlife survey of the park and surrounding area. The report, issued in 1984, stressed that the park is too small to maintain its grizzly bears, and that it depends on surrounding

wilderness to do so:

“No point in Glacier National Park is more than 14 kilometres from the park boundary. Russell et al. (1979) recorded daily movements of 20 km for male grizzlies. The small size of both Mount Revelstoke National Park and Glacier National Park means that the bulk of the parks’ bear populations are probably transient, ranging both inside and outside the parks at different times.”

“Ecological Land Classification of Mount Revelstoke and Glacier National Parks, British Columbia”, Environment Canada, 1984 p. 201.)

Despite a population of about 40 grizzly bears using the park, only two dens had been found, indicating that prime denning areas are located outside the park. Park bears suffered mortality because of collisions on the Trans Canada Highway and the CPR railroad, because of conflicts with humans in the park and in work camps outside the park, and because of hunting on logging roads in areas outside the park. The report lamented the effect of encroaching roads and backcountry work camps in these areas, recommending protection for the Incomappleux.

Page 210: “As areas adjoining MRNP and GNP are opened up by logging, the parks are increasingly becoming isolated reserves for grizzlies. Improved access increases legal and illegal hunting pressure, and the presence of isolated work camps at numerous locations in the Selkirks and Purcells increases the opportunities for grizzlies to be attracted to garbage and food and shot as nuisances. ... It is essential that land-use policy for the areas adjoining these parks take into account the inability of these small parks to sustain a grizzly population that does not cross park boundaries (Hamer 1974A, Mundy 1963).

Page 249: “Grizzly bear populations in MRNP and GNP are small (see grizzly bear species account) and the parks do not support self-contained populations. ... Grizzly bear management in the parks is increasingly influenced by land use policy adjacent to the parks To reduce grizzly mortality from control actions to protect recreationists, it has been recommended before that Clachnacudamn and Mountain Creek watersheds be given special protective status (Mundy 1963, Hamer 1974a, Marsh 1972). MOST GRIZZLY SIGHTINGS BY WILDLIFE INVENTORY STAFF WERE IN THE INCOMAPPLEUX AND FLAT CREEK WATERSHEDS, AND WE RECOMMEND THAT THE INCOMMAPPLEUX BE GIVEN SIMILAR STATUS.”

Unfortunately, in the 1980s logging roads were punched into the Incomappleux Valley as far upstream as Glacier Creek, where a clearcut hosts parking for hikers who come to experience the ancient forest that begins across the creek. Glacier Creek is where the proponent has proposed a new lodge in the high country. It is also the place where intact habitat at low elevation begins for the grizzly bears, and on the road one can see that the habitat is well used by them.

The Valhalla Wilderness Society has been doing conservation work in the upper Incomappleux Valley since 2001. Throughout the valley, perhaps because of heavy hunting, bears do not seem to be numerous and for the logged portion of the valley, most of them seem to be black bears. However, in the upper end of the valley, as one is approaching Glacier Creek, there are several avalanches that come down off of Battle Mountain onto the road. There has seldom been a year when we have failed to see grizzly bear sign on the road in this area, which may be abundant in early spring. Wolf sign has been seen here as well. A little further on, the forest is very wet, fostering heavy Devil’s Club in a strip of beautiful old-growth forest between the road and the river. The bears travel along this area to Glacier Creek, where the road ends in a clearcut, which hosts parking for hikers coming to visit the ancient forest.

A game trail somewhat well used by elk and deer starts up the creek, and along this path bear biologist Wayne McCrory has pointed out tufts of grizzly bear fur on small trees along the path. If possible, trips formally guided by VWS personnel begin with a bear safety talk by McCrory and always bear spray for every member of the party. 2.2 km up the creek is the proposed site of the new lodge.

Whether or how much the grizzly bears of the Incomappleux ascend the creek, we do not know. We do know that they use the ancient forest, especially in spring and early summer. Although one year the droppings indicated a resident bear in the forest, we have never seen the bears, themselves. It is likely that more often they are passing through the forest to the avalanche-track havens up Battlebrook Creek or the Incomappleux River. Glacier Creek has only one clearcut. The rest is part of the intact wilderness. Without a professional assessment in the area of the proposed lodge, there is no reason to assume that Glacier Creek is lacking in its own high-quality grizzly bear habitat.

The Selkirk Mountain Caribou Park Proposal

A month or so ago, VWS submitted to MFLNR a copy of a petition with 5,000 signatures on it, asking for protection of the Selkirk Mountain Caribou Park Proposal.

The proposed Battle Lodge may not be in the park proposal, because it is on the edge of the current boundaries; but the impacts would spread throughout the proposal and affect all of the values for which the area should be fully protected.

Aside from our park proposal, Battle Mountain has its own reasons for needing protection. It has a long history as a place for wilderness mountaineering. The first record we have of recreational climbing on this mountain is the 1947 Harvard Mountaineers journal available on the Internet. Also on the Internet, one can find the account of the 2004 climb of Battle Mountain by the Kootenay Mountaineers Club. In 2010 the Alpine Club of Canada held its summer camp there. We understand that there is an existing hut on the mountain. Our contact with various local mountaineers indicates that Battle Mountain is known and valued for the wilderness mountaineering adventures it affords.

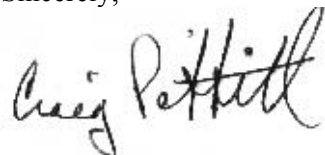
Unless a stop is called on further expansion of helicopter, lodge assisted commercial recreation, VWS predicts that in 10 or 15 years there will be heli-hiking all over these mountains, few if any grizzly bears and mountain goats, no wolverines, and no caribou. There will be a trail from the Battle Lodge down to the big trees, and possibly even a helicopter landing where Glacier Creek intersects the end of the logging road, to deliver the guests of the expanded Incomappleux Lodge and the additional Battle Lodge. The government will have refused to pay to have the road fixed, and members of the public will be permanently blocked from experiencing the big trees. One of the greatest stands of big trees in the world, equivalent to California's redwoods and sequoias or the Coastal Temperate Rainforest of the Olympic Peninsula or Carmanah — will be closed to the public unless they have the money and the inclination to pay for a week's stay at one of the lodges.

This is already in danger of happening, and will worsen when the proponent expands the capacity of the old Mountain Hostel. Indeed, the Mountain Hostel has, for several years now, used the Incomappleux forest in advertisements to attract clients, while closing public access to the road where it crosses private property. Although the road was damaged by a washout, it could just as easily have been fixed.

In summary, VWS is very opposed to the expansion of heli-skiing and backcountry lodges in the area outlined by the proponent. VWS requests that the Ministry of Environment and Ministry of FLNR recognize how seriously the Incomappleux ecosystem has been damaged by past logging decisions. The big trees and the grizzly bear havens around them should never have high numbers of visitors, yet this proposal would put a commercial lodge and heli-skiing business within 2.2 km. It is also very sad that the mountain caribou habitat of the Westfall and Duncan already has overlapping heli-ski tenures. Your Ministry has, until now, given top priority to commercial businesses. This is an opportunity to do

something for public noncommercial recreation and wildlife. It concerns the possibility of preserving an atmosphere in which people might experience something of extraordinary antiquity and primeval wholeness. It starts with NOT approving a new lodge or an overlapping sixth heli-skiing tenure. The next step is to create the Selkirk Mountain Caribou Park.

Sincerely,

A handwritten signature in black ink that reads "Craig Pettitt". The signature is written in a cursive, slightly slanted style.

Craig Pettitt
Director
Valhalla Wilderness Society