

**Garibaldi at Squamish
Environmental Assessment Review
Supplemental Information Application
Mountain Resort Branch, FLNR – Comments – June 22, 2015**

SOCIO-ECONOMIC:

Skier Visitation – the Mountain Resorts Branch disagrees with some of the assumptions behind the visitor projections by Garibaldi at Squamish and is of the opinion that the projections are significantly overstated.

- It is unclear how Garibaldi will achieve 730,000 skier visits and up to 1,000,000 non-ski visits for a total of 1.73 million visitors at build-out; and if they were to achieve that visitation, they would likely be drawing a significant portion of those skiers from existing ski resorts, such as Whistler Blackcomb.
 - Proponent states that trends in the U.S show that while the population has increased, skier visits have remained constant (9-20) and that skier visitation has remained constant but the number of ski areas has decreased from 546 to 470 in 15 years (9-20). How does this translate to 1.73 million visits with the addition of a new resort in close proximity to Whistler?
 - Proponent does not do sufficient analysis on the demographics and attributes of the skier projections. There is no analysis that reconciles new skier participants against exit rates from an aging population.
 - Pg. 9-56: Proponent assumes no additional increase in recreational infrastructure at Whistler Blackcomb and therefore Garibaldi will fill a need for additional lifts based on projected regional population growth. This is an incorrect assumption.
 - WB is in the final stages of receiving provincial approval for a 60 year phased expansion at the resort which includes the addition of 18 new lifts and other recreational infrastructure including expansion into the currently undeveloped west flank of Whistler Mountain.
 - WB projects that their expansion will drive an increase in total new visitation at the end of 60 years to be 600,000 winter and summer visits at an already well-established destination resort. Garibaldi's projection that it will achieve an additional 1.73 million visits appears to be overly optimistic.
 - There is significant undeveloped capacity currently approved by the province at BC resorts. In recent years, the BC tourism sector has been hit hard with a high Canadian dollar and the decline in global economies due to sub-prime fall-out. MRB has been advised by 6 mountain resorts they are prepared to do further significant capital investments, once market conditions are in place. Given that this capacity is at existing resorts where infrastructure is already in place, they will be more responsive to market changes to capitalize on market share, which will affect Garibaldi's visitation projections.
 - It seems reasonable to assume that Garibaldi would intercept some regional and local visitation because it is closer to regional and local markets. If the regional/local market is about 50% of

Whistler Blackcomb's current clientele (Appendix 9B-20) then interception as a result of Garibaldi's proximity to markets could be significant.

- Some of Garibaldi's non-ski visitor projections appear to be overly optimistic and unsupported:
 - 60,000 Nordic visitors at Garibaldi vs 30,000 at Whistler;
 - 60,000 ice-skating visitors per year. What is the impact on the District of Squamish arena?
 - 1650 heli-ski visitors. There is no reference to heli-ski activities in the project description; therefore the effects are not being considered in the 2015 EA review.
- **Cluster Effect** – It is doubtful that the cluster effect applies to the Garibaldi-Whistler Blackcomb scenario.
 - The cluster effect model works where there is a significant visitor population/market in the surrounding region such as in Colorado. BC's market, however, is substantially smaller and BC is not centrally located in Canada for efficient access from other markets eg. Ontario and Quebec.
 - The close proximity of Big White and Silver Star in the Okanagan has not borne out the assertions that the cluster effect would apply in BC. Garibaldi's reliance on the cluster effect as its response to mitigating effects on Whistler is concerning.
 - Has Garibaldi confirmed that Whistler Blackcomb would consider joint-marketing with Garibaldi?

Accommodation Effects – it is unclear from the Accommodation Impact Study how the assertion can be made that the addition of 21,922 bed units in the Sea 2 Sky corridor will not significantly affect occupancy rates at Whistler.

- Accommodation Impact Study uses 1.925 million incremental visits as a basis for its assumption. The Skier/Boarder Demand Analysis uses 1.73 million visits. This requires clarification.
- It is unclear how the accommodation analysis ties into the bed unit allotment for the project and the concept of hot, warm and cold beds.
- Does the Resort Municipality of Whistler confirm the assumption that 2 million visitors per year translates into 5 million visitor days?
- General comment: the study does not clearly describe methods, assumptions and rationale for predictions, outcomes and forecasts provided.

OTHER

Land Use

- **Pg 9-34: Point of Clarification:** Black Tusk Snowmobile Club did not construct the 2 buildings it is using. The buildings were a former day lodge and ancillary building constructed by a ski hill developer for an unsuccessful ski operation in the 1960's. The Club has taken over the maintenance and use of the buildings for its members.
- **Pg 9-37: Point of Clarification:** Woodlot Licence – it appears that the revised study area only overlaps with 1 woodlot not 3 as stated in the Supplemental Application.
- **Pg 9-44: Point of Clarification:** Does the reference to 6 fee simple land parcels include privately and Federally-held land, as there only appears to be 3 privately-held parcels?