

Strathcona Provincial Park Master Plan Review RE: Horse Use in the Park

General Comments received by mail to BC Parks and Ministry of Environment offices to June 25, 2008.

The following comments have been edited for spelling and privacy only.

	Comments
M1	<p>May 31st, 2008</p> <p>RE: Bedwell</p> <p>I was good to see you at the meeting in Courtenay last Wednesday, May 28th.</p> <p>I enclose my submission re: the CWR "proposal".</p> <p>Also is a copy of my letter of August 9, 2007 to the Minister, and a copy of the local paper report of May 27/08.</p> <p>Our Comox and District Mountaineering Club members, including me, have thousands of hours of "sweat equity" in Strathcona Park. The park has millions of dollars worth of resources "locked in" and thieves are only "backed up" until they can make a renewed grab.</p> <p>Thanks for considering my pitch and for your letter to me of May 16th, 2008.</p> <p>*****</p> <p>Letter to the Honorable Barry Penner, Minister of Environment PO Box 9047, Stn. Prov. Gov't Victoria, BC V8W 9E2</p> <p>Dear Mr. Penner</p> <p>RE: Clayoquot Wilderness Resort Application for Park Use Permit for horses and mountain bikes in Bedwell Valley of Strathcona Park</p> <p>In my view, everything about this proposal needs serious examination. While the trails and bridges do need some work, using them as a lever to get private enterprise into the Park is unacceptable.</p> <p>I have been a member of Comox District Mountaineering Club for some fifty years, during which our Club has put in thousands of hours of volunteer labour on trail work, signage, geographical feature naming, meetings and public hearings, our reward being the pleasure of doing it, and the occasional plane or helicopter flight into the work site, plus \$1,000 worth of tools back in the 1990s.</p> <p>For many years, the Forbidden Plateau area, before being taken into the park, suffered severe horse damage, trails were oceans of mud to wade through and became eroded down to bed rock in places.</p> <p>Demolishing the Gayle Magee Memorial Bridge across the Lower Bedwell, as proposed by Clayoquot Wilderness Resort, is also unacceptable.</p> <p>Likely the worst aspect of the CWR deal would be the setting of a precedent for other Park plunderers, who are only backed up until they can make a grab for something else. (Our Friends of Strathcona Park Blockade at Price Creek from January to March, 1988 to</p>

	<p>rid the Park of Cream Silver Mines, from Phillips Creek-Cream Lake area, and Casamiro Mines from Della Falls, and brought an end to the so-called “Recreation Area” designation, a sneaky government mis-nomer which would have allowed logging and mining in Strathcona Park.)</p> <p>Ten years ago, friends and I worked on the trail from Bedwell Lake down into the Valley to You Creek area. If you allow horses and mountain bikes as far as You Creek, they could get up to Bedwell Lake to some of the stunning scenery in the Park. Mixing horses, hikers, and mountain bikers on the same narrow trail is a recipe for accidents.</p> <p>Our provincial Parks are far too precious and irreplaceable to be diddled away and Strathcona Park should never again be used as a “Goody Bag”.</p> <p>Thank you for considering my pitch.</p>
M2	<p>Friday, September 21, 2007</p> <p>RE: Horses in Bedwell Valley of Strathcona Park</p> <p>I speak for the Wilderness Tourism Operators who are totally committed to conservation and good stewardship; so much so that they are committing funds and resources to conservation projects inside and outside provincial parks. Please see http://www.wilderness-tourism.bc.ca/SOP_featured_cos.html.</p> <p>If you were doing the Strathcona master Plan today with the information available about Clayoquot and the Ahousaht Holistic Centre and could have walked the trail with us, I wonder if you would not feel differently about horses and the commercial tourism proposal suggested by Clayoquot Wilderness Resort in the Bedwell Valley.</p> <p>The decision in the Master Plan about commercial activity in Strathcona Park was made in the late 80s and early 90s when BC Parks (and especially Strathcona Park) were threatened by increased mining and forestry activity. The government was proposing to take large areas out of the park to create new mining zones. At that time, tourism interests and some people with Strathcona Park Lodge played significant roles in stopping the silver mine development at Cream Lake and getting the legislation changed so that Strathcona Park would be classified as a Class ‘A’ Park and mining would not be allowed.</p> <p>Only about four percent of the province was designated provincial parkland at that time. Also, Strathcona Park was used more heavily by the public and the trails were maintained by Parks. Times are different now! Fourteen percent of BC is now in parks. Sadly, Provincial Park’s budgets have been heavily cut, resulting in very little trail development and maintenance. There is also considerably less conservation enforcement in the parks. Friends of Strathcona are needed as much now as ever. In her June 04 email, [name] wrote that access to the park was difficult and information almost impossible to find. Only those who are “in the know” can figure out which trails are maintained and accessible.</p> <p>Now switch to the Bedwell Valley and the Clayquot Wilderness Resort (CWR). They started commercial operation in 2000. From the beginning they placed a very high value on conservation and environmental stewardship. The owners have invested heavily in salmon spawning bed replacement. The run had been all but wiped out by very poor logging practices during the time that the area was not in Strathcona Park. Now the fish are coming back, but restoration on this spawning project is ongoing. After last winter’s storms caused considerable damage in the valley, the CWR carried on, even though enormous effort was needed to restore the damage. In addition to this, by having a presence there, CWR has acted as a deterrent to the poaching of animals.</p> <p>CWR owns 500 acres at the head of Bedwell Sound. Their resort has provided a partial barrier to clearcut logging of the pristine Ursus Valley. Serious pressure to develop a large mine in the area has also been made more difficult. Most importantly, CWR is working</p>

	<p>hard to encourage tourism development with Ahousaht First Nations on the east side of the Bedwell, where the Ahousaht have traditional and reserve lands. They are engaged in a project with the Ahousaht to develop a holistic centre in the valley that would cater to tourists in the summer and would provide a much needed retreat for First Nations people in the winter. Such a holistic centre would complement plans of the Ahousaht to build a canopy walkway. This would make a selling out to primary industry seem less attractive to these impoverished people, as well as providing them with long-term income.</p> <p>The CWR wants to extend its range of activities and give its clients horseback access to the old roadbed that parallels the Bedwell Trail, with the destination being in the vicinity of You Creek. This area is not pristine. There were ten people who walked the trail on September 11. Three were directly involved with CWR and the seven others. Six people, were in favour of allowing horses on the old road bed (some with the proviso that the master plan be amended if required). It should be mentioned that the CWR is fine with strict guidelines with respect to horses.</p> <p>The Strathcona Master Plan allowed for horse use in the park: (Item 6.6.6) “Horse Use: Recent public submissions have urged the provision of some horse riding opportunity in Strathcona in areas able to withstand the impact.”</p> <p>“Objective: To provide opportunities for horse use which have minimal impact on the environment or conflict with other users areas.”</p> <p>The plan did not include Bedwell as there was not a proposal or request at that time, but the consideration behind the recommendation for Gold Lake and Kunlin Lake is, I think, the same, only stronger for CWR Bedwell proposal as it includes consultation and approval of the Ahousaht First Nation which is strongly recommended in section 4B of the Master Plan amendment of 2001.</p> <p>I would ask you to carefully reconsider your opposition to the idea of the commercial horse operation proposed by the CWR in the Bedwell. Look at the notes of the Round Table, talk to the participants of the recent inspection and visit the area yourself if you possibly can. I think the goals and objectives you sought in the Strathcona Park Master Plan are better served by supporting this development than by opposing it.</p> <p>Yours truly,</p>
M3	<p>The use of horses in Strathcona Park has been prohibited for good reason. They have a much greater impact on trails and off trail areas than hikers. Horses in particular can turn trails into mudholes very quickly, and trample and graze vegetation.</p> <p>Once we lower our standards for wilderness protection and promote commercial activities in parks, there will be many more applications by those who value parks more as revenue generators than as last bastions of wilderness and biodiversity. Strathcona Park is a jewel of a wilderness area. We must do all we can to protect the wilderness values and the natural ecosystems. This means limiting non-commercial use and prohibiting commercial use. Tour groups on horses are not appropriate in Strathcona Park!!</p> <p>The proposal by Clayoquot Wilderness Resort to run horse tours in Strathcona provincial Park in the Bedwell Valley must be denied. The use of horses in this area is against the Park’s Master Plan and against the recommendations of the Strathcona Park Public Advisory Committee, and against the principles of wilderness park management.</p> <p>Sincerely,</p>
M4	<p>I am writing because I was unable to attend the public meeting in Courtenay, BC, May 28, 2008, regarding possible amendment to the Strathcona Park Master Plan to allow horse access to the Bedwell Valley.</p>

	<p>I am a local resident who has hiked in Strathcona Park for almost thirty years and highly values the physical, mental, and spiritual benefits of time spent in this wilderness environment. Truly priceless.</p> <p>I have several concerns about extending horse access to the park beyond the two areas already designated for horses, in particular allowing horse traffic in the Bedwell valley.</p> <p>There will undoubtedly be habitat loss/displacement and environmental destruction. The construction of horse trails and campsites will result in removal of trees and underbrush, and soil disturbance at the very least. Animal habitat will be destroyed and their movement patterns disrupted. This does not fit Strathcona Park's mission of conserving biodiversity and protecting ecosystems.</p> <p>There will be further impacts on the land as well as on animals and people. I have experienced these impacts first hand in other areas that I explore and horses use. The enjoyment of hiking is greatly reduced when shared with horses. In addition to the offensive stench of feces and urine, especially in the heat, trails become pitted and water collects. Horses chew up trails, especially in wet conditions, leaving areas susceptible to erosion and pollution. Run off, fouled with waste products of horses, eventually finds its way into local waterways. In the case of the current horse proposal for Strathcona Park, these waterways will be the local creeks and streams of the Bedwell Valley, a drinking source for animals and people. This degradation cannot be allowed in Strathcona Park where protection of the ecosystem has to be first priority.</p> <p>One of the cornerstones of Strathcona Park's Mission Statement is preservation of ecological integrity. To introduce horses with their feces, urine, food and associated microorganisms will undoubtedly have effects on the many large mammals and smaller wildlife that survive and hopefully thrive in this wilderness area. It is of the utmost importance to protect their pristine ecosystem in its natural state. The biodiversity of Vancouver Island wildlife preserved and protected in Strathcona Park simply cannot be guaranteed with the intrusion of such a large non-traditional species as the horse.</p> <p>Finally I think philosophically it is wrong to allow a private or profit organization into our BC Parks. The parks are public and should remain so. Privatization does not fit within the boundaries of our BC Parks, no how financially attractive it might seem. Keep Strathcona Park, the first provincial park in British Columbia, with an international profile as a part of the UNESCO Biosphere Reserve, free from any private encroachment.</p> <p>In closing, I encourage you to hold firm to the current Master Plan for the park and not allow horse traffic into the Bedwell Valley or any other parts of Strathcona Park beyond the two areas already so designated.</p> <p>Maintain the integrity and preserve the ecology of Strathcona Park for present and future generations.</p> <p>Sincerely,</p>
M5	<p>May 29, 2008</p> <p>File: 84360-40/Strathcona</p> <p>RE: Strathcona Park Master Plan Review:</p> <p>Thank you for your letter dated May 16, 2008 requesting my participation to review the Strathcona Park Master Plan in order to clarify and confirm areas of the park appropriate for horse use including the lower Bedwell River Road corridor/trail. I attended the public meeting in Courtenay last night.</p> <p>Strathcona Park is a very special place and my family has many wonderful hiking and</p>

	<p>camping memories. I would like to think that future generations would be able to have similar experiences.</p> <p>I cannot support any expansion of horse use in Strathcona Park and specifically along the Lower Bedwell River.</p> <p>There are many hazards created by allowing horse use in the Park including degradation to trails, the introduction of non-native plant species in the droppings and by the added nutrients that will affect fauna and flora. The interaction of horses and large predators such as bears, cougars and wolves would have a negative effect on the wildlife group. I can foresee many disastrous conflict particularly if horses are corralled over night.</p> <p>I have specific problems concerning expanding horse use along the lower Bedwell River.</p> <ol style="list-style-type: none"> 1. This area is not accessible to horse use by the general public from the Bedwell Sound area as this is private property. And even if access permission was granted the inconvenience and expense to barge horses in would, in all effect, eliminate use by the general public. 2. This valley is recovering from previous intense human impact and I have serious concern that the introduction of horses here will impede this natural recovery. Although the Bedwell Valley area is zoned Wilderness Recreation, the Wilderness Conservation Area surrounds it and any introduced plant species could easily spread into these pristine areas with disastrous results. I shudder to think that our ignorance today could cause a problem here similar to that caused by the spread of scotch broom on the East side of Vancouver Island. 3. Horses should not be allowed in a valley due to its sensitive ecological systems and due to it being a wildlife corridor. Also the river course can easily change and wash out trails resulting in riders taking their horses along the riverbed. 4. The Bedwell River trail is a much-loved hiking route. I have found that sharing trails with horses diminishes the wildlife experience. <p>In conclusion, I request we leave the Master plan as it is and evaluate the present areas where horse use is allowed before any further expansion is made. In any case horse use should not be allowed in river valleys and other ecologically sensitive areas.</p> <p>Thank you for giving me this opportunity to express my views.</p> <p>Yours truly,</p>
M6	<p>May 28, 2008</p> <p>To Whom It May Concern:</p> <p>The horse Council of BC represents over 21,000 horse people in the province and lobbies on behalf of riders and owners.</p> <p>Thank you for the opportunity to allow their voice to be heard.</p>
M7	<p>I would like to thank you for recognizing that horse groups should be considered stakeholders in this process.</p> <p>There are approximately 21,000 horse people represented by the Horse Council of BC. The horse council acts as a regulatory body for equestrian vents as well as lobbying for and promoting in behalf of horse riders and owners. Also there are probably about the same number of independent owners or riders that do not belong to horse council but act through other organizations. So you can see that decisions made here regarding horse use in Strathcona Park have the potential to affect a large group of potential park users.</p> <p>The Horse Council of BC supports the continued use of horses in Strathcona Park and is excited at the prospect of possible expansion of areas that may be determined to be appropriate for horse use.</p>

	<p>Of course consideration must be given to maintaining the natural ecosystems within the park. To that end horse council is recommending that only existing active or abandoned roads or trails be considered for use and that specific regulation and restrictions should appropriately be applied and included in the park master plan.</p> <p>Recommendations for horse use in Strathcona Park:</p> <ol style="list-style-type: none"> 1. Allow horse use on existing roads and trails 2. Allow horse use on abandoned roads and trails 3. User groups wishing to use the park for equestrian excursions to maintain roads and trails so as not to negatively impact the surrounding fauna and flora 4. Watercourses to be bridged if possible or use solid bottom crossings only 5. "Quarantine" of horses/feed so as not to introduce foreign plants, etc. to park ecosystems 6. User groups to allow public access to trails under their stewardship within the park 7. Monitoring of wear and tear on trails and corrections made if necessary – "standards" 8. Maintain natural watercourses along trails 9. Use of corrals at camping areas. Camping areas to be determined by type of ground suitable to be able to sustain horse use without significant degradation 10. No crosscountry use so as to protect the natural terrain vegetation 11. User groups responsible for costs of developing and maintaining trails and campsites 12. Public use areas available in camp areas 13. Permit system to control numbers of users at any given time, such as in use in Broken Group Islands and West Coast Trail 14. Existing horse use areas be retained and future areas be explored for use; Bedwell Valley to mine site; Ash River Valley; Elise Lake-Ninim Lake-Oshinow Lake Loop <p>Thank you,</p>
M8	<p>File 6130-08 May 26, 2008</p> <p>I am writing to express my opposition to the proposal to allow horse access to Strathcona Park. I am opposed on the following basis:</p> <ol style="list-style-type: none"> 1. horses cause great damage to trails; 2. this proposal represents a commercialization that will have a negative impact on the wilderness coastal mountain experience; 3. horses were never used on the coast by aboriginals; they do not fit aesthetically, cultural/historically, or ecologically with climate and terrain of the coastal bioregion; 4. hikers and horses meeting on confined trails could pose a hazard for all; 5. the Comox Valley Regional District has spent considerable time and expense in designing a trail surface that resists damage from horse traffic on the One-Spot trail. <p>The cost of construction for an adequate surface has come in at \$56.58 per meter. Consideration should be given to the fact that the West Coast receives considerably more rainfall than the Comox Valley and the cost to build adequate trail surface may be even more in the Bedwell Valley.</p> <p>If it's decided to permit this type of use then I urge that the trail be built to our standard, as a minimum requirement.</p> <p>Sincerely,</p>
M9	<p>I received your letter regarding the Strathcona Provincial Park Master Plan Review.</p>

	<p>Unfortunately, I am out of town all of next week so will miss the May 28 open house. I will try and comment via your web site.</p> <p>I also wanted to express my concern about snowmobilers in the park. I was on a backcountry ski tour in the park to Albert Edward via Helen Mackenzie and Circuit Lakes on the May 3-4 weekend and on my way skiing out, ran into three snowmobilers. They came almost as far as the ranger cabin, up the slope from Helen Mackenzie Lake. They also drove around on the lake and out along the cross-country ski trails. I have also heard from other people that there are snowmobilers in the park regularly.</p>
M10	<p>June 12, 2008</p> <p>RE: file 84360-04/Strathcona;</p> <p>These are my comments on the Strathcona Provincial Park Master Plan Review.</p> <p>I found the public consultation process most unsatisfactory because of the short notice of the meeting and the confusion about whether it was to be about horse use throughout Strathcona Park or specifically in the lower Bedwell River Road corridor/trail. In fact, at the meeting I attended in Courtenay, the facilitator said that the purpose of the meeting was to establish criteria for horse use. It is difficult to prepare for such an important meeting if one has such little time and no clear ideas of its purpose.</p> <p>BC Parks staff tried hard, but unsuccessfully, to separate the purpose of the meeting from the Clayoquot Wilderness Resort (CWR) proposal to take horses into Strathcona Park. The two are obviously connected, and I am appalled at BC Parks' open support for the CWR proposal, the duplicity in its presentation of the issue and its manipulation of the public consultation process.</p> <p>I have read the 1993 Strathcona Park Master Plan (MP and 2001 Master Plan Amendment (MPA) and am impressed by the amount of public consultation that took place in the creation of these documents. The current Master Plan Review process by comparison is completely inadequate and has been very poorly organized in an apparent effort to meet some arbitrary deadline.</p> <p>I do not concur with the claim by BC Parks that there is lack of clarity in the documents about whether horse use is a permitted activity in the Bedwell Valley. The MP and MPA are quite specific in naming where horse use is permitted, (west of Gold Lake, the Kunlin area north of the Ucona River, and in the Donner and Oshinow Lakes area) and the reasons for selecting those areas: that they are at the periphery of the Park; that there is little potential for conflict with hikers and wildlife; and there are existing roads that can withstand this type of use.</p> <p>It is clear from reading the MP and MPA that the public sentiment is that the most important role of Strathcona Park is protection of the wilderness, where native flora and fauna can exist with minimal disturbance by human activities. Opportunities for human recreation must not be allowed to compromise the ecological integrity of the Park, and "management decisions need to be made which first and foremost protect the Park" (<i>MP, Introduction, page 3</i>).</p> <p>I am opposed to horse use in Strathcona Park for the following reasons:</p> <ul style="list-style-type: none"> - Horses have a huge negative impact upon the environment, especially in this area where the annual rainfall is so high. Evidence of past horse use and its destructive effects can still plainly be seen in some areas of the Park. Even the hardest trail surface will become degraded and full of mudholes, making it unappealing to hikers and eventually to riders as well. - The manure produced by horses is a very big problem. It is essentially a noxious

	<p>garbage, because it looks unsightly, it contaminates water and soil, it stinks and attracts flies and it contains viable seeds of non-native plant species. I do not support the notion that, because horse manure is biodegradable, it is not a problem.</p> <ul style="list-style-type: none"> - I do volunteer work in three Comox Valley parks, removing invasive non-native plant species that, if not controlled, would dominate the habitat and lead to eradication of desirable native species. It is very hard work that needs to be done on an annual basis, forever. It would make far more sense to respect the objectives of the MP and take measures to discourage the introduction of non-native species, because eliminating them once they have become established is impossible, and controlling them would require enormous resources. Banning horses from the Park would accomplish this objective. - It has been suggested that horses be fed sterilized feed for a period of time before entering the Park to prevent introduction of non-native species, but opinions vary on how long it that period should be. And how will compliance be monitored? But even if this mitigating measure were adopted, there would still be horse manure on the trails. - CWR has proposed that its horses would travel along gravel bars in places where roadbed has been washed away. That is absolutely unacceptable. An objective of the MP is to protect the pure, unpolluted quality of waters within the Park. Horses traveling through or across watercourses or along river and stream banks will drop manure that will end up in the water, polluting it and rendering it unsuitable for human consumption, and endangering the myriad of riverine organisms that rely on clean water to survive. - I believe that the most important criterion for horse use in Strathcona Park is no-trace horse use. The no-trace ethic ensures that the negative impact of human activities upon the environment is minimal. It is a standard of behaviour that must be encourage in all Park users, not just hikers and backpackers. - I believe that horse use is totally inappropriate in the Wilderness Conservation Zones of Strathcona Park. - Since horse use is currently permitted in a few named areas at the periphery of the park, and because the environmental impact is not large because so few riders use the trails, my recommendation is that horse use should remain as a permitted activity in these areas, but only on existing roadbeds that remain hard and stable. - It is clear that the current opportunities for horse use in Strathcona Park are adequate, and horse use in other areas is neither necessary or desirable. The CWR proposal will not increase opportunities for the public to ride horses in the Park because the Bedwell River trail is, for all practical purposes, inaccessible to them. - I do not support another amendment to the Master Plan because I do not believe it is necessary. However, I suggest an addendum – “Horse use in Strathcona Park is not permitted except in those areas specifically named in the Master Plan and the Master Plan Amendment” – would serve to clarify the contrived issue of whether horse use is a permissible activity in the Bedwell River Valley. <p>I would like to receive project updates by email</p> <p>Sincerely,</p>
M11	<p>I am sorry that it took so long to answer your letter of May 16/08 about Strathcona. I am afraid I have come to the point in my life where I have to back off on anything much out of</p>

	<p>town as I find I cannot drive too far anymore. I am still very much involved with BC Parks with folks in Victoria to work on the Trans Canada Trail and Cowichan River Footpath. There are close enough to home. I would like to back out of the Strathcona Planning although Strathcona, especially the Della Falls has been a big and beautiful part of my life.</p> <p>Thank you</p> <p>Sincerely,</p>
M12	<p>03 June 2008</p> <p>RE: Strathcona Park Master Plan Review; File: 84360-40/Strathcona</p> <p>I am writing to express my disappointment felt by CDMC members over the flawed process BC Park is conducting to review the Strathcona Park Master Plan.</p> <p>Notice of the Public Meeting that was held in Courtenay on 28 May 2008 was inadequate. Some people received notice in the form of a letter from BC Park that, although dated 16 May, was received in the Comox Valley on 22 May, only 6 days before the Courtenay meeting. Others saw a BC Parks announcement in the Comox Valley Echo in the 23 May Edition, while others were made aware of the meeting only the day before, when a journalist's report on the issue appeared in the 27 May edition of the Comox Valley Echo.</p> <p>There is ambiguity in the stated purpose of the Public Meetings. In the BC Parks letter it stated that the purpose was to "clarify and confirm areas of the park appropriate for horse use including the Lower Bedwell River Road corridor/trail", while the announcement in the newspaper stated its purpose as being "to assess the appropriateness of horse use in the park specifically (my emphasis) along the lower Bedwell River road corridor/trail." It was not until we arrived at the meeting that we learned that, in fact, the meeting was to be strictly confined to establishing criteria for horse use throughout Strathcona Park.</p> <p>How can the public be expected to participate effectively in the process if they are given such short notice of the meeting, and when the purpose of the meeting is unclear? Research takes time and cannot be done until one knows the topic. Furthermore, there was no prior press release or other form of communication from BC Parks to provide background information on the reason for the Master Plan review and to provide clear direction on the input being sought from the public. That might have gone a long way to preventing the confusion and frustration clearly felt by the public at the meeting.</p> <p>The stakeholder meeting lacked representation from some important community groups. For instance, the Ahousaht Band was the only First Nations band invited, but the traditional territory of several other First Nations bands (Comox, Cape Mudge, Campbell River to name a few) also extends into Strathcona Park, and none of them were invited. As well, local governments participated in the creation of the Master Plan and its subsequent Amendment, yet none was invited to send a representative. Strathcona Wilderness Institute was not invited, and there are probably several other groups that should have had the opportunity to participate. CDMC received its invitation to attend as a stakeholder only 2 days in advance, and received no other information but the date, location and time. It is not reasonable to expect people to contribute effectively in such a meeting if some indication of its expected outcome is not provided.</p> <p>The public meeting has been told that a decision about a Master Plan amendment will be made based on input from the public meetings, the stakeholder meeting and the results of an environmental impact assessment being done in the lower Bedwell River valley. It would have been helpful to have had the results of that environmental assessment available for scrutiny at the public meetings. The public needs to have as much information as possible in order to make rational, educated comments, but because of the</p>

	<p>foreshortened time frame of the public process, this important data was not available.</p> <p>A point of confusion is that the facilitator at the Courtenay meeting stated that there was to be no discussion about the Clayoquot Wilderness Resort (CWR) application for a Parks Use Permit to guide its guests into Strathcona Park as far as You Creek, because this was not the issue. Yet the information boards at the Open House featured details of the CWR application, and the newspaper announcement of the meeting stated specifically that the Bedwell Valley was to be the focus of the review. Moreover, the environmental impact assessment, which is to be one of the key elements in determining if amendments to the Master Plan are needed, is to be carried out only in the Bedwell Valley. It certainly appears that the CWR application is the principal issue, rather than horse use throughout Strathcona Park.</p> <p>It is obvious from the passionate comments expressed at the public meeting in Courtenay that the public is overwhelmingly opposed to expanded horse use in Strathcona Park. But because the public was misled about the focus of the review, many of the comments BC Parks will receive from them may be deemed irrelevant because they will address the subjective issue of appropriateness of horse use in Strathcona Park rather than the objective issue of criteria for horse use. If this is the case, then the public will have been effectively marginalized by the very badly organized process.</p> <p>We respectfully suggest that, in order to restore the public's confidence in the process and to lend credibility to it, BC Parks slows it down. What's the rush? A further round of well advertised public meetings and a more inclusive stakeholder meeting will demonstrate that the public input is a valuable part of the decision-making process and that BC Parks is not merely going through the motions of consultation. Unless people feel they have been provided with an opportunity for meaningful consultation BC Park cannot claim to have conducted an acceptable public process to resolve a very contentious issue.</p> <p>Sincerely,</p>
M13	<p>June 16/08</p> <p>RE: Strathcona Park Horse Use (Private) in the Bedwell Valley (Clayoquot Wilderness Resort)</p> <p>I would like to register my strong opposition to the proposal to allow the private use of public parkland as suggested by this application. My objection is not so much the use of horses in the park – as we have this use well established in some of our major parks but this is “public use” not private.</p> <p>My main objection is the fact that parkland – in this connection will be lost to public use. My experience with horses tells me that roads and facilities will be required – corrals and building to house guests and wranglers plus the transport of feed – introducing weed seeds etc. into the natural area.</p> <p>Just because the Bedwell was designated and so-called Park Reserve doesn't mean it can be sold to private clubs. The purpose of the reserve status was to facilitate the extraction of some resources that in doing so would not permanently alienate or destroy the recreational values of the park – selling to a private club is not the way to go.</p> <p>Please use what influence you may have to stave off the alienation of parkland.</p> <p>Yours truly,</p>
M14	<p>To: BC Parks Ministry of Environment 2080A Labieux Road</p>

	<p>Nanaimo, BC V9T 6J9</p> <p>Our mission: Back Country Horsemen of BC is an organization that provides an environment of equestrians who are interested in trail riding and the back country, a social, safe leaning atmosphere where people of all ages and experience can enjoy trail riding and the wilderness experience. Through collaboration with individuals, government, business and other recreation users of public lands we strive to preserve and enhance the use of public lands for all equestrians.</p> <p>Our mandate is to maintain existing trails in areas where equines are allowed. Backcountry Horsemen of BC practice the Leave No Trace philosophy whereby there is minimal evidence that we have been in an area.</p> <p>As Backcountry Horsemen, we support the move to allow equestrians into Strathcona Provincial Park in areas that the planning managers decide are appropriate.</p> <p>If you have any questions, please feel free to contact me.</p>
M15	<p>June 16, 2008</p> <p>At the time of the 1993 Strathcona Park Master Plan process, a few specific areas were named where horse use would be permitted.</p> <p>These areas were chosen largely because of existing logging roads.</p> <p>In retrospect, allowing horse use even in these few restricted areas of the park may have been a mistake, since it seems to have opened the idea, in some minds at least, that the whole of Strathcona Park is up for consideration with regard to horse use.</p> <p>This was never the intention.</p> <p>The original master plan treats these areas as exceptions to the general rule for the park, and this is reinforced in the 2001 Master Plan amendment, where once again, these same areas are the only ones under consideration.</p> <p>It's an extremely long mental jump to infer from this that the entire park is up for consideration for horse use.</p> <p>It's an even longer jump when we take into consideration the very obvious theme of minimal human impact, which runs strongly through the entire Strathcona Park Master Plan.</p> <p>The recent impromptu series of public hearings was supposedly to remedy the lack of clarity in the master plan on the issue of horse use in the park.</p> <p>One Parks staff was apparently unaware of this lack of clarity when he stated, according to the SPPAC minutes of October 26, 2004, that "the lodge had applied to take horses in the park but was turned down. That part of the park is closed to horses."</p>
M16	<p>June 16, 2008</p> <p>RE: Horse Use in Strathcona Provincial Park</p> <p>Friends of Clayoquot Sound oppose amending Strathcona Park's Master Plan to allow horse use in the Bedwell Valley, or anywhere else in the park where horses are currently prohibited.</p> <p>We do not consider horses to be ecologically appropriate in rainforest or in/adjacent to watercourses, especially salmon bearing ones.</p> <p>If criteria for horse are considered as an amendment to Strathcona's Master Plan, we support adopting the criteria for horse use put forward by Friends of Strathcona Park.</p> <p>To the FOSPs list of horse use criteria we add the following:</p>

	<ul style="list-style-type: none"> - 5 years as the maximum length of Park Use Permits, with a review after each 5-year period - zero tolerance for negative predator/human interactions as a result of horse use. <p>Thank you for considering our comments.</p> <p>Please inform us when a decision is made regarding this issue.</p> <p>Sincerely,</p>
M17	<p>June 14, 2008</p> <p>To BC Parks Strathcona District</p> <p>On behalf of the 5200 plus members of the BCWF, Vancouver Island Region we would like to express our opposition to Clayoquot Wilderness Resort's proposal to build and use horse trails within the boundaries of Strathcona Wilderness Provincial Park.</p> <p>Strathcona Park was established in 1911 and is British Columbia's oldest park. The Vancouver Island Region of the BC Wildlife Federation has had an involvement with the park that goes back to the early 1950s, which is even before we were a Federation. Since that time we have fought flooding, mining, logging and land trades with a park that should have served as a shining example of our commitment to wilderness and its protection.</p> <p>We fully support the position of the BC Wildlife Federation's Parks Committee that commercialization does not belong in our wilderness parks.</p> <p>Clayoquot Wilderness Resort is without question a commercial operation and should be denied this proposal.</p> <p>Our position to Clayoquot Wilderness Resort's proposal does not preclude discussion on residents using horses within the park boundaries but these discussions must take place between the Parks District and the public before any decision is made.</p>
M18	<p>11 June 2008</p> <p>Re: File 84360-40/Strathcona</p> <p>On behalf of the Comox District Mountaineering Club (CDMD) members, I am writing to advise you that the only criteria for horse use in Strathcona Park that we can support is no-trace horse use, the same standard of wilderness ethics that is expected of all Park users.</p> <p>If hikers are required to defecate at least 50 metres away from watercourses or bodies of waters, and to bury their feces, why should they have to put up with piles of smelly, unsightly, polluting horse manure deposited along trails in the Park? How can park values be protected and appropriate behaviour encourage if one group of users if one group of users is allowed to use the Park without regard for the environment and other users?</p> <p>If hikers and backpackers are expected to pack out what they pack in, why should horse users be permitted to leave heaps of horse dung on the trails. Is horse manure littering the trails any more acceptable than plastic bags or beer cans? We don't think so. Horse manure maybe biodegradable, but it is not innocuous.</p> <p>CDMC members do not want to see further degradation of trails in the Park, such as has occurred from historic horse use on the Mount Becher trail and in Forbidden Plateau. There is ample evidence of the enormous environmental damage that results when horse riding occurs in rain forests. Has nothing been learned from past mistakes? Horse use does not occur without significant environmental impact.</p> <p>Horse use in the Park also comprises some objectives identified in the 1993 Master Plan (MP) and 2001 Master Plan Amendment (MPA):</p>

	<p><u>MP, page 23; 5.2 Water</u> Objective: to protect the pure, unpolluted quality of waters within the Park. How pure and unpolluted will those waters be after horses have been ridden along riverbeds or across streams, defecating as they go?</p> <p><u>MP, page 25; 5.3 Vegetation</u> Objective: to eliminate and discourage the establishment of non-native species. How can BC Parks ensure that horses have been fed sterilized feed for a sufficient length of time so that viable seeds of non-native species are no longer present in the animal's gut? The answer is that they cannot. And what resources does BC Parks have available to eliminate non-native species? The answer is none, as is evident from the amount of Scotch broom flourishing in the peripheral areas of the Park.</p> <p>We believe the most important function of Strathcona Park is the conservation of wilderness; opportunities for human recreation come a distant second.</p> <p>Therefore, the only amendment to the Strathcona Park Master Plan that CDMC can support is one that will completely eliminate horse use from the Park.</p> <p>Sincerely,</p>
M19	<p>Though our main concern is Oyster Bay Regional Park, we take an interest in other parks in central Vancouver Island area. We are not in favour of horses in Strathcona Park because we feel that the park should be kept as pristine as possible with minimum disturbance. With so much of our island being logged and developed, parks are more important than ever, particularly as reserves for biodiversity.</p> <p>The Bedwell River area is within the Clayoquot Sound UNESCO Biosphere Reserve which deserves maximum protection. Horses would have a negative impact on trails (weight and hooves) and water quality (urine and feces) and disturbance to wildlife and plants would undoubtedly occur. Non-native species would probably be introduced. Strathcona is BC's oldest and one of its biggest parks. It has suffered much abuse in the past and now it is time to show it some respect!</p> <p>Thank you for the opportunity to respond to this important decision.</p>
M20	<p>June 19, 2008</p> <p><u>Re: Strathcona Provincial Park Master Plan Review</u></p> <p>The Outdoor Recreation Council of British Columbia (ORC) acts as an umbrella organization for BC's leading public recreation federations or organization which are provincial in scope. While ORC may not necessarily represent the views of all its members on a particular issue, it does have the ability to consult groups with varying interests on issues concerning recreation and we also discuss many such issues at the regular meetings of ORCs Executive Board of Directors and at its Annual General Meeting.</p> <p>For the past several months ORC has been considering issues related to the use of the Bedwell Valley by horses from the Clayoquot Wilderness Resort (CWR) to access Strathcona Provincial Park across its southern boundary. We have reviewed the concerns raised by groups such as the Friends of Strathcona Park (which is not a member of ORC), as well as other local and regional groups. We have decided that, on balance, the Bedwell Valley should be opened up to use by horses provided CWR agrees to maintain the trail it uses for its horse tours inside the Park. As a result we recommend that during the Review of the Park's Master Plan the necessary amendments be made to permit use by horses in this area.</p> <p>In coming to this conclusion we have considered the following:</p>

	<p><u>Introduction of invasive or alien plant species:</u> This possible outcome of the introduction of horse feed and manure in the Park has been cited as a reason not to allow horses in this area of the Park. However we understand that CWR would use standard purging techniques and feed modification to ensure that the diet of horses for periods immediately preceding and during their use of the Bedwell Trail would not introduce alien species.</p> <p><u>Erosion of Trails:</u> This could be the most egregious outcome of increased use by horses of the trail in question due to the impact it could have on the use of the trail by hikers. We suggest this can be addressed by placing the onus on the commercial user to maintain the trail, or neither it nor the hikers would have a trail to use. Hence the condition for use referred to above.</p> <p><u>Level of Traffic:</u> It is our understanding that the overall level of traffic in this area of the Park is minimal and that it is unlikely to rise significantly if used by one additional tour operator. We also understand that additional use of the southern extremity of the Park could be considered to meet the overall objectives of the Park Master Plan.</p> <p><u>Reputation of the Operator:</u> We have been led to understand by local sources that CWR has displayed a responsible approach to preservation of the environment in its sphere of operations.</p> <p>In summary we recommend that the Park Master Plan be amended with a view to permitting and providing for horse use in the Bedwell Valley.</p> <p>Yours sincerely,</p>
<p>W21</p>	<p>The Hon. Barry Penner Minister of the Environment Parliament Buildings Victoria, B.C.</p> <p>Dear Minister Penner,</p> <p>I am writing to encourage you to not amend the Master Plan for Strathcona Park to permit any horse use beyond that currently allowed.</p> <p>There are a number of concerns raised by the application for Clayoquot Wilderness Resort (CWR) in the Bedwell Valley, ranging from significant environmental concerns, to how the government has conducted its recent “consultation process” on the matter.</p> <p>1) The flaws in the consultation process alone are reason enough to call a halt to amending the plan. There has been very little advertising, what there was appeared a few days before the meetings, the message given to the public about the purpose of the meetings was vague, ambiguous and confusing. The meetings were poorly managed. There was a critical lack of involvement by key stakeholders, including various First Nations and a number of communities bordering on Strathcona Park.</p> <p>2) Horse use has already been thoroughly considered and is included in the plan which was developed very democratically over a period of years involving every community and stakeholder group. The plan should not be revised based on a single permit application by a single commercial interest.</p> <p>3) The public that did attend the consultation process spoke overwhelmingly against the CWR proposal and amending the master plan.</p>

4) In the event that these arguments do not persuade you and you remain intent on amending the Master Plan for Strathcona Park the following criteria must be included in any changes you make:

- horses can only be permitted in locations accessible to all British Columbians on an equal basis and at minimal expense to the user

- access to horse riding areas must be by public roads capable of accommodating vehicles pulling horse trailers

- horses must be ridden only on accessible, continuous, regularly maintained, solidly-based graveled road surfaces

- all horse routes must be significantly removed from fresh water courses, including streams, rivers, lakes and oceans

- all water crossings must be via horse-capable bridges - no horses allowed in water courses at any time

- horses can not be permitted in the alpine, in valley bottoms, on hiking trails, or in any sensitive habitat

Please note that the areas presently designated for horse use in the park meet all of these criteria, which is why they were carefully chosen in the first place. There is no need for revision to the plan at this time.

I look forward to your response on this matter.

Sincerely,