

## Comments on WSBC Avalanche planning process.

1. The commercial snowmobile industry is young and needs more time to implement <sup>new</sup> regulations. We've been working hard on our guide standards as they relate to avalanche safety for our guests and most operations have good measures in place. (control, training, observations) E.g. I have run a back country operation since 1993, and never even been near an avalanche in the Revelstoke area. *Also we operate on very large terrain, making assessment costly & labor intense and at times impossible.*
2. The qualifications for avalanche planner is absurd and excessive. 15 years is too long. Presently only 2 people in this province are qualified, and presently only 6 snowmobile people have a level 2 CAA training, which may take up to 3 to 5 years to obtain. A doctor practices in what .5 or 6 years. Also our industry needs to train their own planners, as our industry is quite different and unique. We are non gravity based, and many avalanche technicians do not understand how snowmobiles work and what terrain they use.
3. Our industry largely operates in front country and simple terrain. The majority operates 2 and 3 hour tours. Complex terrain makes out only 4 % of uses, yet operations will close down if they cannot meet WSBC requirements short term.
4. Our approach to avalanche safety is one of avoidance. I deal with hundreds of snowmobilers a year that ride backcountry with me. In 13 years we have had 2 minor accidents only, always caused by carelessness of the clients, not the terrain, guiding, conditions or avalanche situations. In an area deemed avalanche dangerous, we commercially never have been faced with actual avalanche control measures we had to implement, prior, during or after an avalanche situation, due largely to our pre-trip decision making process of avoidance. And this with our present guide standard of a level 1 CAA training. Most of the 'challenging' and 'complex' terrain gets used very little, and can easily be avoided due to the nature of our activity.
5. *Add to amendments the fact that all snowmobile operators also go through a M.T.S.A. tenure approval process that include a*  
 Our recommendations are *Avalanche Management Master Plan.*
  1. To reduce the planner experience qualification to 8 years max.
  2. Our industry might not survive a rapid introduction of this legislation. We need time to implement our standards and those of WSBC for operating in avalanche terrain. Mandatory implementation further might require financial assistance to get small operations on board with guide and planner training and qualification. We require interim recommendations to be implemented over a 6 year period. This would enable us to train sufficient staff to a level 2 avalanche technician (CAA)
  3. Avalanche safety plans would require a min 2 year implementation period

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