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ALPINE RESORT

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Prevention Policy & Regulation Review Department,
Policy and Research Division, WorksafeBC,
Workers Compensation Board of British Columbia,
PO Box 5350, Stn. Terminal,
Vancouver, BC.
V6B 5L5.

Dear Sirs:

Proposed Amendments for Part 4: General Conditions in the OH&S Regulations.

Specifically: proposed new section 4.1.1 "Terrain Stability Assessment."

I have attached a letter from Jimmie Spencer, OBC and President and CEO of the Canada West Ski Areas Association. The position of the snow industry is quite clear in that the proposed changes while "well-intentioned, are misguided and unworkable" for our industry.

Along with Jimmie's thoughts I would like to add further comment.

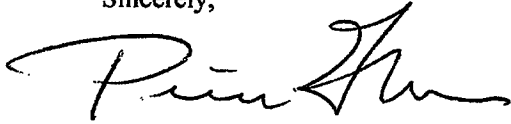
Terrain stability assessments as proposed by the amendments in section 4.1.1 and as described in Definitions, part 1, will require a "qualified registered professional (QRP)." In question is the timely availability of the two identified professionals, one an engineer as defined in the Engineers and Geoscientists Act or a forester as defined in the Foresters Act. Also in question, is the current inventory of QRPs sufficient? Are they fully aware of each BC's 43 resorts unique characteristics? Snow resorts already have highly trained Qualified Avalanche Experts (QAEs) on staff who monitor on a daily basis, risk assessment and avalanche control plans. These are based on well-researched snow industry norms and are tailor made to each resort based on years of practical experience. The staff are certified through the Canadian Avalanche Association. These people are certified in all aspects of snow management including the use of explosives with Worksafe BC. The other advantage they have is in mobility. They are intimate with the terrain they work in and are experts on either skis or boards. While the patrol have final say in the opening of a closed area for staff and public, snow resorts need to open daily and on time and the safety of the staff and public are paramount. This additional step of having a QRP appears to be unnecessary as all the checks and balances are in place for our industry.

In terms of Mount Washington's current winter inventory of QAEs we employ 8 fully certified experts who have WCB/Worksafe blasting tickets and a minimum two years experience in this line of work and are all highly proficient in sliding on snow. In terms of a succession plan for these people, we have a mentoring program fully documented for 8 additional employees who are

prepared for avalanche certification and other tickets. At all times during the winter season there are a minimum of 4 fully certified staff on duty with mentored back up of at least 4.

Thank you for your attention. Again, I would refer to Jimme's thorough letter outlining our industries ability to professionally and safely address terrain stability.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Gibson". The signature is fluid and cursive, with a large initial "P" and "G".

Peter Gibson, President Mount Washington/Chair BC Yukon Zone of the Canada West Ski Areas Association

Cc Jimmie Spencer