



Resorts of the Canadian Rockies
Experience the Ultimate

4.10



From: Robin Siggers
Mountain Operations Manager
Resorts of the Canadian Rockies, Inc.
Division 11 Fernie Alpine Resort
Box 5339 Fernie B.C. V0B 1M0
Ph. 250-423-2459
Fax 250-423-6644
rsiggers@skifernie.com

To: Workers Compensation Board of British Columbia Policy & Regulatory Review
Department.

Re: OH&SR Proposed Amendments to Part 4: General Conditions 4.1.2 Avalanche
Assessment.

This letter is written on behalf of the employer Resorts of the Canadian Rockies, Inc. and is to confirm that our company strongly disagree with the proposed changes to 4.1.2. that state: **“Before work commences in a workplace where there is or may be a risk to a person working in the workplace from an avalanche, a qualified registered professional must conduct an avalanche assessment”**.

This proposed regulation in our view creates an unrealistic expectation that the new regulation would improve worker safety. The Fernie Alpine Resort Avalanche Safety Team has been in the business of avalanche terrain identification, control and mitigation for over 30 years.

The Fernie Alpine Resort ski area is located in the East Kooteney region of B.C. in the Southern Rocky Mountains. The Fernie Alpine Resort operates on 2800 acres of crown lease lands and has an average of 300,000 skier days annually. Fernie Alpine Resort currently operates one of the largest ski area avalanche safety programs in North America. The Resort Avalanche Safety Program is based upon the Rogers Pass Snow and Avalanche Safety Program model. Our program was developed in the mid 1970's and is continually updated as new terrain is developed or techniques become available. Fernie Alpine Resort's Avalanche Safety Plan identifies all in bounds avalanche terrain, mitigation measures, and safety protocols for all mountain staff. This work is performed on a minute-by-minute basis during the ski season.

For the past 30 years, Fernie Alpine Resort has been on the leading edge of avalanche safety program development in Canada. Working closely with the Canadian Avalanche Association, Fernie Alpine Resort has acted as an industry leader promoting avalanche safety for ski areas and the alpine ski industry in general.

Fernie Alpine Resort was a founding member of “Infoex”, an industry avalanche information exchange program that after more than 20 years of operation is now

internationally recognized as the best information sharing system for avalanche safety operations in the world. "Infoex" is now recognized as the world's richest database available for avalanche research purposes. Fernie Alpine Resort has been a major contributor of avalanche related data since the "Infoex" inception.

The avalanche forecasters of Fernie Alpine Resort have worked for many years as instructors for the Canadian Avalanche Association Industry Training Schools (CAATS). CAATS is widely regarded as the world's best avalanche training program.

The Fernie Alpine Resort Snow Safety Analyst is a Professional member of the Canadian Avalanche Association as dictated by the Fernie Alpine Resort Avalanche Safety Plan. To achieve Canadian Avalanche Association Professional Membership requires approximately five years of working full time in an avalanche safety program doing avalanche mitigation and terrain assessments. In addition the CAA Continuing Professional Development Program provides members the opportunity to continue to develop expertise in avalanche safety measures.

It is the view of Resorts of the Canadian Rockies, Inc. that the Professional members of the Canadian Avalanche Association within our staff are completely qualified to do the work described in the changes to regulation 4.1.2 (2). They have the experience and the history to do this work. They are the recognized experts.

Currently there are insufficient numbers of "Qualified Registered Professionals" as per the definition Part 1.1. We believe the available "Qualified Registered Professionals" would not be qualified to make terrain assessments for an Avalanche Safety Program such as the one at Fernie Alpine Resort. The Fernie Alpine Resort staff that do the avalanche control work here in the Resort are the undisputed experts in that field. If anyone wants to inquire about avalanche safety, mitigation, control work, or avalanche terrain identification within our ski area boundary they would seek out our staff as the resident experts.

The Fernie Alpine Resort avalanche safety teams have spent countless hours in the terrain during storms, observing avalanches. Our snow safety observers have been there and seen what happens in winter during the myriad of variations of avalanche conditions that can occur within the snowpack and terrain over an hour, a day, a week and each month of the ski season.

We do not believe that evaluations of a "Qualified Registered Professional" regarding the avalanche terrain and pathways within our resort will improve on this.

Fernie Alpine resort Avalanche Safety Plan

The Fernie Alpine Resort Avalanche Safety Plan is a formalization of policy and procedures that have been adopted or projected by Fernie Alpine Resort to facilitate the safe management of avalanches which have the potential to effect the ski area's terrain, staff, users, and related facilities. Within this plan is a general outline of the actions of the

Avalanche Safety Team, Ski Area Management, and other operating personnel pertaining to avalanche safety for the entire ski area. The plan has been designed and prepared to protect the skiing public, the staff, and physical installations at Fernie Alpine Resort from the hazardous effects of avalanches. The plan uses a combination of closures and active methods to control the risks of avalanches. Strictly enforced procedures and closures are used to control the movements of staff, public, and equipment about the resort. The operational closure decisions are made the Avalanche Safety Analyst or Duty Analyst. The Avalanche Safety Analyst or Duty Analyst will maintain status as professional members of the Canadian Avalanche Association.

Having this comprehensive Avalanche Safety Plan is a requirement for the ski area as part of our "Master Development Agreement" with the Province of B.C. The "Commercial Alpine Ski Policy" which is today, the leading Provincial document regarding the development and operation of British Columbia's ski resorts, governs this agreement. Additionally we are audited on an annual basis by the B.C. Safety Authority that review our procedures for avalanche risk assessments and mitigation measures with regards to ski lifts.

All avalanche sites and affected areas are given a closed status at the end of each day's operation. They remain closed until the Avalanche Safety Team has determined that they are safe from avalanches. Closure decisions are the responsibility of the Avalanche Safety Analyst or his appointed Duty Analyst.

Operationally our avalanche safety program records hundreds of avalanche events each winter within our resort. We use an average of \$150,000 of explosives annually to control avalanches, firing over 1000 avalancher rounds, throwing over 1000 hand charges and flying dozens of helicopter control missions. With our automated weather stations, our snow safety teams do weather observations twice each day and more frequently during snowstorms. Full snow profiles are done weekly or daily if needed to monitor layer.

We record every avalanche occurrence larger than size 1.5 both naturally and artificially triggered within our ski area boundary, according to the standards included in the Operational Guidelines for Snow and Avalanches Observations by the Canadian Avalanche Association. These avalanche observations include photographic records and detailed technical measurements. These are cataloged and archived for future reference.

We believe the proposed regulatory change would not be able to offer any greater results than what we currently achieve. Our forecasters and ski patrol staff are out in the terrain every day from the when the first fall until the ski area closes for the season each spring. Our avalanche safety team has an intimate knowledge of our terrain, including every side gully or small open patch in the woods where an avalanche may occur should the avalanche conditions allow. Our Avalanche Safety Observers understand through experience when an avalanche path is ready to produce an avalanche that may outrun its historical boundary, because they have been there to see it happen. Our Avalanche Safety

Team are the experts that understand the subtle effects of precipitation, temperature, wind, sun, and how these factors combine with our terrain to create avalanche conditions.

We believe that “Qualified Registered Professionals” hired to fulfill the requirements of this proposed regulation change would, in fact have no choice but to talk to our staff to understand our avalanche hazards.

Worker and public safety are critical to the survival of our industry. The Avalanche Safety Team at Fernie Alpine Resort are very aware of the risks and dangers involved in avalanche control. We are compelled to do everything possible to keep workers safe from the risks of avalanches and we believe we have the tools, the people, and the expertise to continue to do that.

There is no question that ski areas with avalanche terrain within their boundaries such as Fernie Alpine Resort need written Policies and Procedures that detail daily operating plans, blasting procedures, recording standards, decision making and performance measuring based on “Industry Best Practices. We have these subjects thoroughly addressed in our “Avalanche Safety Plan” and Operational Manual.

We strongly believe that Qualified Avalanche Professionals should be responsible for worker safety with regards to the risk of avalanches. We believe that Qualified Avalanche Professionals are defined as the Avalanche Duty Analysts, and Snow Safety Teams as described here.

In closing, we believe this proposed regulatory change to be redundant, ineffective and simply the wrong approach to worker safety within ski areas in British Columbia. As ski area operators, Resorts of the Canadian Rockies, Inc. and the Fernie Alpine Resort strongly disagree with the proposed changes.



Robin Siggers
Fernie Alpine Resort Mountain Operations Manager



Andy Cohen
General Manager B.C. Division, Resorts of the Canadian Rockies