



Reference: 262947

April 21, 2021

VIA EMAIL: [louisepedersen@orcbc.ca](mailto:louisepedersen@orcbc.ca)

Louise Pedersen, Executive Director  
Outdoor Recreation Council of B.C.  
PO Box 28112  
Vancouver, British Columbia  
V6C 3T7

Dear Louise Pedersen:

Thank you for your letter of April 3, 2021, to Honourable Katrine Conroy, Minister of Forests, Lands, Natural Resource Operations and Rural Development, regarding investments in maintaining Forest Service Roads. I have been asked to respond.

We appreciate the Outdoor Recreation Council of BC's interest and summary of the Office of the Auditor General's Management of Forest Service Roads audit report from November 2020, as well as the Forest Practices Board's (FPB) Access Management and Resource Roads: 2015 Update special report. We have worked closely with both groups of auditors and appreciate their third-party analysis. We agree there are opportunities for improvement in our Forest Service Road (FSR) management and systems policies and data collection.

Similarly, it is also important to recognize the three recent on-the-ground FPB Audit of District Manager Obligations on Forest Service Roads audit reports for the Peace, Campbell River and Okanagan Shuswap natural resource districts. In each case the findings were positive and the board reported, "The forest service road and major crossing construction, maintenance and deactivation practices carried out by the ... Resource District Manager ... complied in all significant respects with the requirements of the *Forest and Range Practices Act*, the *Wildfire Act* and related regulations."

In terms of scope, in 2015 the FPB estimated there was approximately 620,000 kilometres of resource roads in British Columbia, of which approximately 60,000 kilometres are FSRs. By comparison, there are about 48,000 kilometres of provincial highways and rural side roads. About 12,000 kilometres of the FSR network is financially capitalized to ensure safe, secure and ongoing access to 1) communities, 2) rural residences and 3) high-value recreation (in priority order).

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As you may know, FSRs are not built or maintained to the same standards as paved public roadways. Most FSRs have gravel surfaces and are narrow (often one-lane wide) and many are not maintained for public vehicular access. There may be roadside brush limiting visibility, soft shoulders, more and tighter curves, with road grades that are much steeper than encountered on public highways. Users are obligated to drive FSRs commensurate with existing road conditions under the *Occupiers Liability Act*.

The ministry relies upon the Engineering program policies to help inform FSR maintenance and deactivation practices and priorities. These policies are regularly reviewed and revised if necessary, to meet the dynamic nature of resource road management. This is to ensure we are accounting for subtle or broader changes in our business, including the important recreational considerations you have identified, as well as other variables such as rural economic development, climate change, First Nations reconciliation and the available resources to manage the complex resource road network.

You may be interested to know that, through a November 2018 policy memorandum (attached), District Engineering Officers and District Recreation Officers are encouraged to meet annually to review the local Recreation Sites and Trails priority list of High Value Recreation. This is to ensure the local road managers are accounting for current recreational access considerations in their budgeting process. Through this process the ministry tracks which FSRs are critical for the public's access/egress, which guides the Resource District's annual budget request. The service plan quantifies and allocates the limited operational maintenance funding in the priority order listed above. Accordingly, Resource Districts with the highest use/highest risk FSRs serving rural communities receive the greatest share of the limited operational maintenance funding.

Overall, the ministry Engineering program and the forest industry undertake considerable effort to collectively and effectively manage the FSR network as to mitigate risk and facilitate user safety and environmental protection commensurate with legislation, regulation, policy, road data systems and available resources. Local partnership agreements with other stakeholders are sometimes considered where practicable, typically based upon the capacity of stakeholder groups (through local governments) to adequately maintain the road infrastructure. Generally, long-term FSR management typically falls back to the provincial government over time due to the reality of risk management and overall cost of FSR maintenance.

While the ministry supports the objectives of increasing tourism and recreational opportunities in the province, we currently have limited funds available to continuously maintain all FSRs other than those accessing rural communities and residents. Therefore, it is incumbent upon our Engineering program to assess the risks, determine the options and manage the FSR network to mitigate these risks, which may include partial or full road deactivation. User safety and environmental protection are paramount, and effective policy will continue to guide the program in this regard.

We always welcome feedback directly from local government and stakeholders to help inform these efforts. Functionally, local District Managers and their staff are frontline and are critical to this process, as they prepare annual needs assessments on FSRs that eventually result in maintenance plans.

Louise Pedersen, Executive Director

The ministry encourages local governments and other informed users such as yourselves to help inform this process. Our policies and service plans are living documents and we are always looking for ways to improve and make it as relevant as possible to current needs commensurate with legislation, policy and available resources.

Please do not hesitate to contact Peter Wyatt, Director, Engineering Branch, at [peter.wyatt@gov.bc.ca](mailto:peter.wyatt@gov.bc.ca) if you have further questions.

Again, thank you for writing and sharing your concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Elliott', with a stylized flourish at the end.

Richard Elliott  
Executive Director

Attachment: HVR FSR Road Maintenance Memorandum – November 15, 2018

pc: Minister Katrine Conroy, Ministry of Forests, Lands, Natural Resource Operations  
and Rural Development