



July 15, 2019

The Honourable Doug Donaldson
Minister of Forests, Lands, Natural Resource Operations and Rural Development
PO Box 9049 Stn Prov Govt
Victoria, BC V8W 9E2
Via: engagefrpa@gov.bc.ca

Dear Minister Donaldson:

Forest and Range Practices Act Consultation

The Outdoor Recreation Council of BC (ORC) applauds the BC Government on its decision to make significant changes to the *Forest and Range Practices Act*, which is a key piece of legislation that sets out the parameters for how these vital public lands and resources are managed.

As an umbrella organization representing the broad spectrum of non-commercial outdoor recreation interests in BC, ORC welcomes this opportunity to provide broad recommendations for what we see as some of the necessary changes to BC's *Forest and Range Practices Act*.

Outdoor recreation is a highly valued component of most British Columbians' lifestyle, and access to outdoor recreation amenities is known to help determine the choice of employment and residence for many of us. According to the 2009/10 Outdoor Recreation Study: BC Resident Participants, published by Destination BC in 2013, 91% of BC's residents participated in at least one outdoor recreation activity during the past year. Of those that had participated, nearly two-thirds participated in activities at least once a week.

Although the social, health and economic values of outdoor recreation opportunities are widely recognized¹, the economic impact benefits can be difficult to quantify. However, we know that outdoor recreation stimulates economic activity locally and regionally as participants spend money on equipment, food and travel². Outdoor recreation also plays a role in invigorating communities all across BC financially through the creation of trails and facilities as amenities that spur economic development and diversification. Through planning that integrates trails and recreation facilities with cultural activities and hospitality, there is rich potential for promoting amenity-rich communities (or a conglomerate of communities) as a tourism destination.

¹ Elisabeth Buchwald (2018)

² Kux Stephen & Wolfgang Haider (2014)

Additionally, studies show that participation in recreational activities is an important contributor to good mental health and quality of life³. Parks and trails that are accessible to urban and rural communities offer an excellent incentive to engage in physical activity and are shown to help reduce depression, relieve stress and improve self-esteem. Furthermore, participation in outdoor recreation and physical activity help reverse the current trend towards a sedentary lifestyle that is recognized as a major contributor towards many health and social issues.

Outdoor recreation opportunities, trails and parks are also essential for improving and maintaining healthy communities. Communities that have easy access to outdoor recreation opportunities tend to also have safer and livelier neighbourhoods, higher levels of volunteer engagement and environmental stewardship. Social bonds are strengthened when families and community members participate in outdoor recreation together and when seniors and individuals with disabilities are actively engaged in recreation activities.

Outdoor recreation can also play a critical role in supporting Indigenous reconciliation. There is tremendous value in incorporating Indigenous knowledge, history and perspectives in the planning and management of recreation and trail projects, and with each of these efforts, there is an opportunity to foster the kind of relationships with Indigenous communities that we want to build for the future⁴.

The Forest and Range Practices Act

FRPA is the governing Act for the forestry industry's practices. It outlines legal objectives for the management of forests and range in the province including concerns about adverse impacts to objectives such as cultural heritage resources, soils, water, fish, wildlife, biodiversity, timber, forage, recreation, resource features, and visual quality.

Recreation is part of the Forest and Range Practices Act (FRPA) framework and makes up one of the 11 FRPA values for which government may set objectives to manage and protect under the act. FRPA defines recreation resources broadly as recreational features, scenic or wilderness settings that have recreational significance, and recreation facilities. These objectives are established through regulation and land use plans.

Issues and Solutions

We are fortunate to live in a province that is rich in natural resources which supports multiple primary resource sectors including forestry, mining, agriculture, forestry and tourism. While extraction of timber has traditionally been - and continues to be - a vital part of BC's economy, the overall contribution to the economy has seen a steady downward trend since 2004⁵ while tourism as an industry has seen an increase, greatly helped by BC's international 'Super, Natural BC' brand which markets the province as unrivalled in terms of its natural beauty and abundant wildlife, clean air and water, and access to and diversity of recreation activities. There are several factors behind the decline in the economic contribution of forestry including the

³ Rosenberger, Randall S.; White, Eric M.; Kline, Jeffrey D.; Cvitanovich, Claire (2017)

⁴ Outdoor Recreation Council of BC (2019)

⁵ Should not be interpreted as an inevitable decline to zero.

recent impacts of the mountain beetle infestation, increasing wildfire activity, low timber prices and lingering impacts of softwood lumber duties.

Forestry and tourism/outdoor recreation draw on different, often competing values from the same piece of crown land. While forestry licensees seek to obtain economic value through the extraction of timber⁶, the tourism and outdoor recreation sector draws value through non-extractive, high quality experiences facilitated by access to and through forested crown lands⁷. However, within this context it's important to point out that the combination of outdoor recreation and tourism draws upon a limited resource that must be managed well and not overused or abused. Investment into managing this resource is necessary.

Climate Change and Resilient Landscapes

Lack of landscape resilience and climate change impacts all British Columbians. We must take a long term view in land use planning and make ecosystem health and resilience a priority to ensure BC's forests can cope with the impacts of climate change. The province must seek input from Indigenous communities, local communities and scientists, and fire management plans must take into account the recreational, ecological and community values in addition to timber values.

Landscape level planning

It is critical that FRPA contains a meaningful objective for retaining recreation values during and after industrial activity. In the absence of an objective, there is no requirement for licensees to include results and accompanying strategies in their Forest Stewardship Plans and subsequent cutblocks. Established facilities and trails under section 56 of FRPA which include objectives for recreation are offered some protection but many existing trails are not yet legally established under FRPA, which is an issue for protecting and maintaining the recreational values.

We believe that public access to crown land for responsible outdoor recreation and nature enjoyment is one of our essential rights as British Columbians. With crown lands covering 94% of BC's landbase, motorized vehicle access on forest roads is often necessary to get to recreation areas and trail heads. However access for outdoor recreation is becoming increasingly limited across the landscape as more and more gates close off previous access. We ask that the province maintains an open gate policy which has been common practice in the past.

We also request that the province maintains access for outdoor recreation through the maintenance of forest roads to areas that provide significant recreation opportunities, while obviously taking into consideration any adverse impacts to wildlife, water quality and fish habitat during the decision-making. The province should consult with the outdoor recreation community before decommissioning roads to more fully understand current and future access needs.

⁶ Generally considered a renewable resource, except in the context of old-growth forests.

⁷ Gooch, Natasha (2011)

Circle routes connecting rural communities should be one of the priorities with a request to leave some key bridges allowing off pavement access to and through rural communities and reducing the number of 'cul de sacs' that many current forest service roads present. We also ask that the province creates water access sites at bridge install locations for potential camping spots or day use areas.

Opportunities for public involvement in access management planning for the location of new resource roads and for the deactivation of existing roads have been weak for over a decade and means that opportunities to address specific access issues and concerns are lost. In your review of FRPA, we ask that you give proper consideration to developing a process at a higher (landscape/tactical) level that can address access management planning and provide direction for operational plans⁸.

We ask that the province gives consideration to the Forest Practices Board's recent report, 'Tactical forest planning: the missing link between strategic planning and operational planning in BC'⁹. Enhanced landscape level planning can help the provincial government facilitate better coordination between strategic and operational plans and help ensure that the cumulative effects of multiple developments and natural disturbances due to climate change are carefully planned for and managed. Tactical (landscape level) planning might also be the proper place to address the broader issue of land allocation for commercial recreation. It is currently a significant and growing concern of ours that the province each year approves a large number of commercial adventure tourism applications at the expense of public non-commercial recreation and without taking into account the cumulative impacts of adventure tourism licences and industrial developments. As commercial enterprises are being granted exclusive rights to land traditionally used by the outdoor recreation community, the non-commercial recreation community is so to speak being squeezed out of many areas. By adopting a landscape level planning, the impact to the public has a better likelihood of being taken into greater account.

Lastly, in addition to considering recreation values, we also recommend that the province undertake inventories and assessments on values like old-growth, endangered species and critical habitat, freshwater quality and salmon stock data and trends are necessary to support the planning process.

Public Trust

Full transparency is essential in regaining public trust. All information on pending resource applications, planning (including review opportunities of forest stewardship plans) and rationale should be made public through an accessible digital platform, including input from industry, local authorities and other stakeholders. All relevant maps, assessments and studies should be made public as early as possible in the planning process.

⁸ Forest Practices Board (2018)

⁹ Forest Practices Board (2019)

We encourage the province to consider an easier process for the outdoor recreation community to become formally recognized as stakeholders in the forest planning process. Issues that the outdoor recreation organizations have interest in include instances when trail systems are within cut blocks and to further work with BCTS and other forest companies to improve trails systems during and after cuts.

Resource Values and Objectives

It is critical that an updated FRPA recognizes, appreciates and considers non-timber values of forest lands including those that support a strong outdoor recreation sector along with values such as community engagement, indigenous rights, protecting old-growth forests, functioning ecosystems and climate resiliency.

The province's continued reliance on economic returns from timber extraction is reflected in the Government Actions Regulation (part of FRPA). Section 2 (1) (b) requires that orders do not unduly reduce the supply of timber. FRPA should encompass values that are important to British Columbians and to the outdoor recreation sector, which need to be given at least an equal consideration including wildlife, biodiversity, connectivity of habitat, outdoor recreation and visual quality. It is clear that the province has continued to prioritize timber extraction over other uses, including outdoor recreation and tourism, however an updated FRPA must view crown land with a vision that supports a more diverse and integrated economy. For this reason we ask that the current restraint of "without unduly reducing the supply of timber from British Columbia's forests" should be removed from FRPA's legal objectives.

We ask that the province include local and provincial recreation groups as core values in the FRPA process to allow participation, input and improvement to trail and facility systems before, during and after harvest.

Oversight and Accountability

Licensees should be required to provide sufficient information for provincial decision-makers to evaluate operational plans and proposed forest operations for consistency with legal objectives and require government approval of site-level plans. Decision-makers should be required to provide written reasons that are accessible to the public that outlines how proposed industrial activity is consistent with statutory tests, legal objectives and public comment. It would also be in the public's interest to give government the authority, without adding an excessive bureaucratic burden, to set objectives that are informed by public input for a particular area.

About the Outdoor Recreation Council of British Columbia

Founded in 1976, the Outdoor Recreation Council of British Columbia (ORC) is a registered non-profit charity and works on behalf of 50 provincial and regional member organizations to protect and promote responsible outdoor recreation. Our vision is for British Columbia to be a world leader in the conservation and enjoyment of outdoor places, and for all British Columbians to have access to diverse and abundant opportunities to enjoy outdoor recreation experiences.

Specifically we work to encourage British Columbians to actively participate in outdoor recreational activities that will enhance their physical, social and mental well-being; advocate for and facilitate access to public lands and waters for outdoor recreation; build bridges between outdoor recreation groups; and encourage the safe and responsible use of the outdoors through education programs promoting safety and outdoor ethics.

Thank you in advance for considering the Outdoor Recreation Council of BC's submission to the Forest and Range Practices Act consultation. We look forward to continuing to work with you as a partner in making responsible outdoor recreation a way of life in British Columbia.

Sincerely,



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Executive Director

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