



Revelstoke, April 20, 2021

Honourable Nathan Cullen, MLA
Minister of State for Lands and Natural Resource Operations
LNROSecretariat@gov.bc.ca

Dear Minister,

Thank you for the opportunity to provide input into the potential restructuring of the Ministry of Forests, Lands, Natural Resource Operations and Rural Development. As an umbrella organization composed of organizational members representing the broad and diverse spectrum of public organized outdoor recreation user groups in BC, we have canvassed our members concerning their experiences and insights. Please find our response to your three questions below.

What would you say is working well today in your interactions with FLNRORD and the natural resource sector ministries?

Working with Recreation Sites and Trails BC

As a public, organized outdoor recreation sector, our main interface to FLNRORD is primarily Recreation Sites and Trails BC (RSTBC). There was a strong sentiment that RSTBC is a strong advocate within government for recreation and access. Many of our member organizations report that they have good or excellent working relationships with district officers on volunteer partnership agreements for trails and recreation site facilities.

Provincial trails strategy

RSTBC is the lead provincial agency for supporting the implementation of the Trails Strategy for British Columbia (2013). The Trails Strategy is an important document that guides how trails are planned and managed in BC. Its vision is "a world-renowned, sustainable network of trails, with opportunities for all, which provides benefits for trails users, communities and the province." The Provincial Trails Advisory Body (PTAB) is a working group established by the Province in 2015 that is co-chaired by the ORC and RSTBC and composed of representatives from various provincial government ministries, local government, the outdoor recreation sector and tourism. The PTAB's mandate includes the mandate to conduct periodic formal reviews and make recommendations for improvements to the Trails Strategy.

A recent comprehensive review of the Trails Strategy showed a large number of shortfalls in terms of its implementation and how it was resourced. The PTAB will present its recommendations to government shortly for how best to update and implement the new Trails

Strategy. Implementation of the new Trails Strategy presents a significant opportunity for the Province to leverage strategic connections and goals with First Nations reconciliation, rural development, diversity and inclusion, active transportation, healthy lifestyles, and COVID-19 economic recovery efforts.

What are the main challenges facing your organization working with the government's natural resource sector ministries?

Recognition and resourcing of outdoor recreation

For decades there has been a consistent low recognition within government of the many benefits of outdoor recreation for community health and well-being, rural economic development and tourism, sustainable resource management, and Indigenous reconciliation. We particularly see this in terms of funding for recreation within FLNRORD, in forest legislation and in land use planning. A compounding factor is a resounding lack of outdoor recreation-specific research, data and other insights at the provincial level which could support planning, management and marketing efforts of the outdoor recreation sector.

Some of the most consistent challenges that our members experience stems from insufficient resourcing of RSTBC, a lack of staff capacity and an absence of updated procedures to ensure transparency and expediency for section 56 or 57 applications. It often takes years before volunteer groups receive feedback or approvals for their applications. It was also brought up that the process is cumbersome, lacks transparency, and there's no appeal process if approval isn't granted. Due to long-standing capacity issues within RSTCBC, the responsibility of maintenance is transferred to volunteer groups.

A [recent report](#) by the Outdoor Recreation Council of BC confirms that government and non-government funding opportunities for volunteer groups who partner with RSTBC (and BC Parks) on trail infrastructure maintenance remain very inadequate and that the Province's heavy reliance on volunteers to maintain trail infrastructure without sound support systems in place leads to volunteer burnout. The ORC and the PTAB will put forward recommendations to the Province for a BC Trails Fund which can help put in place sustainable and reliable funding in support of essential trail maintenance and upgrades.

Protection of recreational values under FRPA

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, however it's the only value without an objective. It is critical that the updated Act recognizes, appreciates and considers non-timber values of forest lands, including those that support a strong outdoor recreation sector. Amendments to FRPA should provide a clear objective for recreation which in return will trigger a requirement for forest stewardship plans to consider recreation during planning, and the resulting strategies and outcomes can therefore be evaluated for how effectively they addressed this objective. Under the new Act, it should be much easier for recreation groups to become recognized and consulted as stakeholders when forest management plans are developed. In [our submission](#) to the 2019 FRPA consultation, we

also asked that the current restraint of “without unduly reducing the supply of timber from British Columbia’s forests” be removed from FRPA’s legal objectives.

Access and resource roads

Increasingly we are experiencing that public recreational access is being reduced and the burden on volunteers to ensure our interests are recognized is becoming harder. There are many tables and arms of Government working in isolation. There are processes that happen under the drafting of the hunting regulations (AMA's), wildlife reviews, habitat restoration projects, commercial recreation tenure applications, industrial harvesting, pipelines, wind farms, road rehabilitation projects, and a ministry (RSTBC) that is understaffed to assist clubs to ensure they are aware of all the initiatives that are impacting the public’s future access to recreational opportunities.

Much access for outdoor recreation is facilitated via forest service roads (FSRs) to areas such as trailheads that provide significant recreation opportunities and are in some cases used as an integral part of the trail system itself. While FSRs in BC are built primarily to access timber for forestry operations, they provide important access to communities and are crucial in accessing wilderness areas and many of the trail networks across the province. Given the fundamental role that resource roads play for outdoor recreation and rural economic development, it is essential that recreation interests are considered on an ongoing basis in resource road decisions. 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 it means that opportunities to address specific access issues and concerns are lost. We recommend proper consideration to develop a process at a higher (landscape/tactical) level that can address access management planning and provide direction for operational plans.

Earlier this year, the Office of the Auditor General of British Columbia released an audit report on forest service roads (FSRs) which reviewed whether FLNRORD managed safety and environmental risks on FSRs in accordance with its policies. The audit found several significant issues with the way the Province is managing its FSRs. The ORC is concerned that the Province is failing to provide the most basic needs to maintain these roads. We believe that FSRs deserve proper attention and investments so they can continue to be a resource to recreationists and communities throughout BC. Please see our recent letter to the Honourable Katrine Conroy [here](#).

Fish, wildlife and habitat values

Fish, wildlife and habitat values are at an all-time low across the province and many species are endangered and heading for extirpation due to unsustainable resource extraction and a lack of strategic and coordinated planning and action. The situation is particularly grim for species such as BC’s iconic steelhead and for several species of Pacific salmon. We are concerned that no ministry is working with recreational fishing groups to protect and enhance freshwater fisheries, fish habitat, enforcement of existing laws and regulations, promotion of endangered species status for steelhead with the federal Department of Fisheries and Oceans Canada. The ORC is part of the provincial Fish, Wildlife and Habitat Coalition and support the goals of the coalition,

including a new Ministry of Sustainable Resource Management with a mandate that is focused on managing the multiple values fish, wildlife and habitat provide to British Columbians.

If you could change one thing, what would it be and why?

Overall we would like to see more recognition of the important role that public outdoor recreation plays in British Columbia. Investments in outdoor recreation will earn compounding returns in the form of healthier economies, healthier communities, environmental sustainability, and reconciliation with Indigenous Peoples.

Specifically, we would like to see amendments to the *Forest and Range Practices Act* that provide a clear objective for recreation which in return will trigger a requirement for forest stewardship plans to consider recreation during planning, and the resulting strategies and outcomes can therefore be evaluated for how effectively they addressed this objective. Under the new Act, it should be much easier for recreation groups to become recognized and consulted as stakeholders when forest management plans are developed.

Thank you for taking our written submission into consideration as you continue to contemplate how best to set up the new Ministry of Lands and Natural Resource Operations.

Sincerely,



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