



Via Email Megan.Beveridge@gov.bc.ca

June 22, 2016

Megan Beveridge

Authorizations Policy Analyst

BC Parks

Ministry of Environment

Dear Ms. Beveridge,

Re: Draft Policy for Public Notification and Engagement on Permits under the Park Act and Ecological Reserve Act

Thank you for the opportunity to comment on the draft Policy for Public Notification and Engagement on Permits under the *Park Act* and *Ecological Reserve Act*.

Our organization, the Federation of Mountain Clubs of BC (FMCBC), is a non-profit umbrella organization of 37 non-motorized outdoor recreation clubs with over 5000 individual members. For over forty years, the FMCBC has been representing the interests of our members and the general public that engage in non-motorized outdoor recreation. One of our mandates is to maintain and enhance natural and peaceful wilderness experiences in the backcountry, as well as in parks. This requires protecting the backcountry, particularly backcountry within parks, from incursions of motorized recreational activities and commercial development.

Below are our particular concerns or comments relating to the draft Policy:

- 1) We are pleased that active permits and relevant information relating to these permits will be available on line until the permit has expired or is canceled. However, we believe that the complete permit should be available for public view on the BC Parks website for the duration of the permit, not just the information proposed in the draft policy. Any obligations, responsibilities or duties of the permit holder should be fully disclosed to the public, as well as any ability for the permit holder to restrict or limit, directly or indirectly, public use or access to the provincial parks, protected areas, conservancies, ecological reserves and recreation areas.
- 2) It is imperative that the public has the opportunity to review and provide comments on applications before a park use or resource use permit is issued, particularly if the permit will impact carrying capacity, restrict or impact public use or access in any way, or will allow the permit holder to limit use or access in any way. All relevant information about the permit, including where the permit information can be found, if not on the BC Parks website, and the proposed duration of the permit should be disclosed. The notice period must be adequate to be meaningful. While 10 days, as presently proposed, may be sufficient for short-term use permits of one day or a couple of weeks at most, a period of 10 days is wholly inadequate for longer-term use permits. The notice period should be commensurate with the proposed duration of the permit. The proposed 10-day

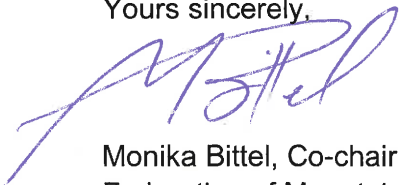
notification period is impossibly short and impracticable for volunteer organizations, such as the FMCBC, to have sufficient time to review, consult their membership and respond appropriately. A minimum of 30 days and preferably longer for extended use permits is necessary in order for public notification of a permit application to be meaningful; otherwise, the public notification serves no useful purpose.

- 3) We believe that there must be public consultation for what are described in the draft Policy as “exceptional cases”, i.e., permit applications for development of an accommodation facility or investigative use research or where assessment of an application identifies information gaps. Not only should what constitutes an “exceptional case” be clearly set out but also the criteria that will guide the Minister or BC Parks in determining whether public consultation should be undertaken. If not, the reason for public notification of a permit application is undermined. Furthermore, if issuance of a permit may result in restrictions on or may impact public use or access, or may allow the permit holder to limit use or access in any way, public consultation should be required. Decisions relating to use permits within provincial parks, protected areas, conservancies, ecological reserves and recreation areas should be transparent, beginning with giving adequate and consistent public notification of any substantive permit applications.
- 4) We agree that where it is determined that an opportunity for public review and comment is required, the minimum standard should be that all relevant information (i.e., name of person/company applying, proposed location of the activity (name of park(s), area of province), requested length of term of the permit, proposed activities and whether the application is new, a renewal or an amendment of an existing activity), along with the closing date and address for submission of comments should be easily accessible through links on the BC Parks website. However, we also strongly believe that where it is determined that a permit application requires public input prior to a decision being made, public notification of the permit application and the opportunity for public consultation should not be limited to regional or local areas. Provincial parks, protected areas, conservancies, ecological reserves and recreation areas are for the benefit of the public generally and the tools or methods used to give the public the opportunity to comment should be province wide, particularly when the proposed location of the activity is of broad general public interest (i.e., not limited to local communities or regional interest).

We have had the benefit of reviewing the comments that were submitted by Peter Wood, Director of CPAWS, BC Chapter, and the FMCBC fully supports and agrees with those submissions.

In summary, our main concerns relate to the proposed short time frame for public notification of permit applications, the potential for the public not to receive notice about some significant permit applications, and the potential for the public notification and consultation to be limited and not reflective of province-wide or broad general public interest in an area.

Yours sincerely,



Monika Bittel, Co-chair of SWBC Recreation & Conservation Committee
Federation of Mountain Clubs of BC