



August 30, 2018

Email: rri-ltd@shaw.ca

Jeremy Webb, Recreation Specialist Contractor

Re: Managing Recreation Values under FRPA – Comments from the FMCBC

Dear Mr. Webb,

This document is in response to your request for input on the Forest Practice Boards Special Report on the Management of Forest Recreation under the Forest and Range Practices Act (FRPA). It will determine how forestry planning and practices are addressing forest recreation values under FRPA. Specifically, the report will look at the following:

1. How the FRPA framework addresses management of forest recreation values
2. The strengths and weaknesses of the FRPA framework
3. Opportunities to improve management of forest recreation values

Survey Questions and Answers from the FMCBC

1. How does outdoor recreation matter to you or your organization?

The Federation of Mountain Clubs of BC is a non-profit society with the following goals:

Through leadership, advocacy and education, the FMCBC works to protect and maintain access to backcountry areas for quality, non-motorized recreation in BC. Our membership is comprised of a diverse group of non-motorized backcountry recreationists including hikers, rock climbers, mountaineers, trail runners, kayakers, mountain bikers, backcountry skiers and snowshoers. As an organization, we believe the enjoyment of these pursuits in an unspoiled environment is a vital component to the quality of life for British Columbians.



2. How does the FRPA framework address management of forest recreation values in your view?

Although there is the ability to do many positive things to protect and enhance recreational values through the wording in the FRPA, because of priorities and lack of funding the provincial government does little to protect recreation values.

There is the perception that the Forest Service and licensees only recognize the areas and trails that have been formally designated by Recreation Sites and Trails BC (RSTBC). This leaves huge areas of sub-alpine and alpine terrain plus the informal routes that are used to access them completely out of the planning process. With the increasing interest in wilderness recreation and resulting pressure on the parks system, it is important to protect the use of all of areas that provide recreational opportunities.

3. What do you believe to be the strengths or the weaknesses of the FRPA framework?

Since everything in the act is based on recommendations from the Minister, there is no permanent framework for recreation management.

Under the current FRPA regulations, there doesn't seem to be an established way for the public to provide input about areas that are important for recreation, apart from those designated by RSTBC.

Also we think that if the licence holder has CSA certification for sustainable forest management that there is a requirement for a public advisory committee that would keep them informed about recreation values. Has that been implemented anywhere in BC? We think that less than half of the licences are certified this way (others have SFA or FSI certification).

The simplistic answer would be to require all license holders to be certified under CSA standards, but this may not be practical for small areas or where the population is too widely dispersed to have a public advisory committee. If recreation groups can get themselves recognized as stakeholders for the purpose of reviewing Forest Stewardship Plans, they will at least be able to say what areas



are valuable for recreation. However, there is presently no category under which forests can be protected for recreation, as there is for riparian values or wildlife habitat trees.

4. Are there opportunities to improve management of forest recreation values under FRPA?

We not sure what this question is looking for. Can you elaborate?

5. Concerning Forest Recreation, are objectives set by government and Forest Stewardship Plans (FSPs) helping manage forest recreation?

We can't find any objectives that are being set by the Forest Service or licensees. Could you provide some examples of objectives?

6. What trends are you seeing in forest recreation?

We have noticed a great increase in the number of people looking for recreation opportunities in the forests. They are younger (more in the 20–40 year age bracket) and many are hiking with dogs. Those with children are looking for safe picnic and campground areas with lake or river access.

In the past 10–20 years, there has been a large increase in the number of mountain bikers riding and building trails in forests. Many trails are being built without proper authorization and are not being properly maintained.

There are more people using forest roads for access to trails but many roads are not drivable.

7. If it were up to you, what would you do to change how outdoor recreation is managed?



On the RSTBC website it states:

Recreation Sites and Trails BC exists to provide safe, quality recreation opportunities for the public by developing, maintaining and managing a network of sites and trails. It is based in Victoria, with operations province-wide.

We do enjoy the network of sites and trails, but don't think this network is anywhere close to the meeting the needs of the large numbers of BC residents and visitors that want to use our recreational resources.

Here are some ideas from our members:

- Get the public involved more in recreation management. When we provide input to RSTBC they only seem to provide excuses why they can't do more.
- Try to work on a consensus plan—that will be the first step in moving forward.
- On the RSTBC website, there is no contact information for the ministry employees. There is a contact email form with no guidelines for the role of ministry staff.
- When we contact RSTBC staff, our perception is that the ministry staff try to be helpful but they always seem to be overwhelmed.
- The interactive map on the RSTBC website that shows designated sites and trails does not show all designated sites and trails.
- The information on individual sites and trails is very out of date and incomplete.
- A much better way to provide information on sites and trails is required. A tabular structure with better search capabilities is recommended.
- The database could be improved with public input.
- There is no information on trail conditions
- There is no simple way to provide information on trails conditions and trail maintenance that is required
- There is no information on which groups are maintaining sites and trails.
- Many areas in BC, and specifically the South Coast region, are dealing with over-use and over-capacity issues. Recently, on July 26, 2018, at a stakeholders meeting regarding the Singing Pass Trail, a traditional non-motorized access trail to Garibaldi Park through Crown land, the RSTBC stated that carrying capacity determinations will drive management decisions. In our view, if carrying capacity determinations will drive management decisions, the carrying



capacity assessments relied upon, including the data and methodology used, must be shared with the public. More public consultation is needed about carrying capacity and recreation management.

Concerns on forest roads:

Our members would like to have more input over how the roads are decommissioned after harvesting. In some districts, access management plans have been completed with input from the public. We need this to be a standard for all districts with ways for the public to get information and provide feedback on a regular basis.

We understand that some roads need to be closed to protect wildlife and for public safety. As suggested above access management plans are required.

The mandatory decommissioning of spur lines can mean many kilometres of extra walking before our members can get to the trailhead. When water-barring is necessary, we would like to see it done with a wider cross-section and a more gentle approach and exit slopes, so that 4WD vehicles, as well as ATVs, can continue to use the road. Cross-ditching too, can be improved in the same way.

8. Can you suggest a case study to illustrate where forest recreation management is or is not working?

From a member in the Alpine Club of Canada Vancouver Section:

There are many trails and access roads not being properly maintained.

We are trying to work cooperatively with RSTBC in the Squamish Office. Our attempts to provide positive recommendations to them are answered with lots of excuses on why they can't do anything. This is frustrating probably to all parties involved. We need to work on a better cooperative relationship.

From a Vancouver Island Club member:



Our relationship here in the Alberni Valley with the Ministry of FLNROR (esp, BC Timber Sales and RSTBC) has improved greatly in the past few years as far as consultation goes. However, unless regulations are changed and budgets improved, it is difficult to do much to increase recreation opportunities. This has already resulted in illicit camping and habitat destruction in several places along some lakeshores.

9. Is there anything else that you think we need to know? If yes, then please specify.

We are realizing that our forests, which once seemed so limitless, are under pressure from many directions: the need to preserve habitat and representative old-growth, First Nations claims, and the increasing demand for wilderness recreation opportunities, besides their traditional purpose of providing jobs and revenue through stumpage. Making it possible to use more of the resource roads (for a fee if necessary) and creating more recreation sites with paid camping could provide an additional revenue stream from our forest lands (private managed forest-lands seem to be going this way already). More discussion is definitely needed here.

Thanks for the opportunity to contribute and we look forward to seeing the results.

Sincerely,

Jay MacArthur
FMCBC Director

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