



July 15, 2019

The Honourable Doug Donaldson
Minister of Forests, Lands, Natural Resource Operations and Rural Development
Room 248, Parliament Buildings,
Victoria, BC V8V1X4

Dear Minister Donaldson:

The Federation of Mountain Clubs of BC would like to thank you for the changes you have made in the *Forest and Range Practices Act* ("FRPA") to make it more transparent to the public, and we welcome the opportunity to make more suggestions as to how FRPA can be improved.

Our organization represents 44 clubs with a membership of about 5000 people who are engaged in non-motorized outdoor activities, often in wilderness or forested areas. Of course, distances in BC being as vast as they are, we frequently need to use motorized vehicles on forest service roads to get to our starting point, and we appreciate the open gate policy we have always experienced on land managed by BC Timber Sales and as Tree Farm Licences.

The right of public access to all Crown land is a very important principle that should be part of every licence or lease agreement that the government signs with any tenure holder (i.e., industrial, forestry or adventure tourism).

We would like to have more public input on which roads are decommissioned after logging is finished in an area. Sometimes these roads lead to areas that are important for recreation, including trailheads used to access scenic ridges, alpine lakes, glaciers, alpine huts and mountain peaks. As an example, in the Robson Valley, two roads were deactivated which provided prime access to provincial parks and trails. This was done without consultation with BC Parks or anyone. Although after several years of concerted efforts by the McBride community, public access to one road was recently restored, this remains a good example of the impact that the loss of a forest service or permit road can have on communities, seeking to diversify their regional economic base via tourism.

It would also be very beneficial if funding were available for maintaining roads required to access valuable recreational areas and popular trailheads. Over time, if no longer used for industrial purposes, roads become impassable as roads brush in, washouts occur, and bridges fail. Access to many popular trails and recreation areas used for decades has been lost because the road maintenance is beyond volunteers' ability to keep open. A couple of examples where access has been lost or made very challenging for most people include:

- The Nesakwatch Forest Service Road, which provides access to both the Slesse Memorial and Mt. Rexford trails, washed out, limiting access to those with high clearance 4WD vehicles, if at all.

- On Vancouver Island, the Marion Creek Forest Service Road, which provides access to many popular mountain peaks and the new 5040 Peak Hut constructed by the Alpine Club of Canada Vancouver Island Section, is now impassable to vehicles other than 4WD or high clearance vehicles.
- In the southwest BC, including the Sea to Sky Corridor, access to trails, routes and prime alpine areas has been lost or made very challenging due to road deactivation, erosion, washouts or bridge failures or removal.

We would also like to have better standards for the erosion-control modifications made on roads. Water bars and cross ditching serve a useful purpose, however, to improve or maintain the maximum drivability of the road, more specifications are needed. For example, specifications about their frequency, their location, whether partial or full width is required, on which side the water should be directed, and the angle of the cross-sections. Training courses for the machine operators who do the work would be beneficial to ensure such standards are met and maintained.

Under the FRPA, the *Government Actions Regulation* (GAR) directs how the provincial government establishes land designations or stewardship measures for eleven resource values (sections 5 to 15 of GAR). Some of these values, like Water Quality, Visual Quality, and Fish/Riparian are taken into account with every cut block that is laid out and harvested. For others, such as Wildlife or Recreation, areas were established decades ago, at the beginning of the program to protect such objectives and have not been added to significantly since. However, public values have changed, and the use of the forest for recreation and the enjoyment of natural surroundings is now much more important than when these areas were originally established. In our view, there *has* to be much more public consultation regarding all values, not just recreation, in the management and exploitation of our Crown lands. Further, we strongly recommend removing the over-riding constraint in section 2(1)(a) of GAR, which prevents the minister from increasing areas in relation to non-timber resource values, such as Recreation or Wildlife, unless it “would not unduly reduce the supply of timber from British Columbia’s forests”. The minister should have the flexibility to respond to the public’s increasing interest in the recreational value of our forests.

To meet the increasing demand for public nature based outdoor recreation, more consideration must be given to protect trails during logging operations, whether the trails are recorded on Open Street Map, Google maps, guidebooks, or recognized by Recreation Sites and Trails BC (“RSTBC”). In our view, protection cannot be limited to the trails designated under section 56 of the FRPA because RSTBC simply does not have the capacity or resources to process applications for trail authorizations, whether the applications relate to new, historic or well-established trails. Although a section 56 designation does not prevent logging along the trail or over it, the logging companies must at least manage for the trail and often will (but not always) minimize harm to the trail. In contrast, non-section 56 trails essentially have no protection what-so-ever. Providing adequate buffers to protect trails, particularly those which cannot be re-routed or cannot be re-routed easily without affecting the quality or feasibility of the trail, should be the norm. Once an area has been logged, the work required to maintain the trail increases substantially due to the loss of the forest canopy (e.g., erosion concerns; frequency of brushing). This of course assumes that the trail can be restored.

We appreciate this opportunity to add our input to the revisions of the Forest and Range Practices Act.

Sincerely yours,

Barry J Janyk
Executive Director