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The Wilderness Tourism Association of BC (WTA) is comprised of small and medium size adventure tourism businesses locate through out BC. The WTA formed in 1999 to address on going land and marine use and stewardship issues that were negatively effecting WTA operators and the long term viability of their business. Adventure tourism in BC contributes \$2 billion in annual income via over 2500 businesses. Most of these benefits flow to BC's rural economy, adding strength, diversity and resilience.

WTA operator's businesses are directly affected by forest management and harvesting. The tourism business streams include (but not limited to) aboriginal tourism, sea kayaking, river rafting, marine tourism, bear viewing, heli and backcountry skiing and more.

Forestry activities are one of the most significant and long-standing issues effecting the viability of adventure tourism. Whether it be from changes to viewscape, loss of tourism infrastructure, conflicts with timing or lack of consideration of other economic activities on the land base; forestry and tourism are not working in harmony at the present time. The objectives and organizational culture stemming from the Forest and Range Practices Act is the source of the problem and it needs to change if the province hopes to maintain and achieve its tourism objectives.

Rural communities are looking to adventure tourism as one of their sustainable economic drivers. Stewardship of the forest land base for a diverse set of economic, social and cultural activities is crucial for the future of rural BC.

Discussion:

The Forest and Range Practices Act and Regulation are a good foundation for creating and effective forest management regime. Unfortunately, as the are currently written, they are not focused on creating a sustainable future for the forest ecosystems or creating multiple economic benefits from this public resource.

To address this there needs to be a sea change in objectives and forest management culture in our province. Our forests are more than fiber supply for saw mills. They are important for cultural, spiritual, and local community food sources. They provide other economic benefits for tourism, botanicals and local organized and un organized recreation and other services. They provide ecosystem services like clean water and air, ecological diversity for healthy species diversity, habitat for resident and transient wildlife. They also provide wood for the mills which is an important economic activity, but its not the only industry that is dependent on the forest land base.



Unfortunately, the current FRPA Regulations do little to recognize these values. The WTA understands the change required to address the deficiency in the current regulatory environment cannot occur overnight. While saying this, environmental change and human trends on the forest land base are occurring at a much faster pace than any one predicted so it in incumbent on government to place a transparent plan of action to address the needs of communities and the ecological systems at long term risk now. Much has been lost, now is the time to act. The following answers to the questions on FRPA change respect this need.

Q1) What are the key economic, environmental and social values that should be addressed through landscape-level planning, and how would you like to be involved in the planning process.

In order to address key economic, environmental and social values to be addressed by Landscape Unit planning the recognized FRPA values needs to be expanded and legalized. Objectives that have no legal standing and serve only as information to a decisionmaker have little value and diminish public confidence and government transparency.

Landscape unit planning needs to expand its economic, environmental and social lens to include all uses of the forest landscape, not just meeting mill and ACC quotas.

This means that other FRPA values (all forest economic, environmental, social and cultural are identified, recognized and respected, given equal weight at the planning and decision making level. This means the FRPA regulations (Regulation Section 5 -9.1) need to be changed so a decision maker can implement the LLUP.

Q1.2) An important element of landscape-level planning is the identification of gaps in information about values of importance to the public. Based on what is important to you or your community, what types of research priorities and information gaps should be addressed?

All significant environmental, economic, social and cultural values need to be identified, mapped and a value or significance placed on them from a local, regional and provincial perspective.

BC's landscapes are very diverse and one local area may contain a very high value resource at the provincial, regional or local scale. Research should be focused on assessing the significance of a resource value on this basis if not already known.

Resource values for tourism and not well documented and those that are were identified over 20 years ago and were not comprehensive. Tourism resource values include: forest resources surrounding, travel corridors (road, river, lakes, maritime, trails); viewscapes from (permanent facilities or locations like cabins or lodges, roads, trails, rivers, lakes, maritime passages), satellite camps; Natural/special features like old growth forests.



wildlife viewing areas; significant recreational features like snow fields and trails, lakes, mountainous and meadow terrain; access through trails and roads; Other?

Recognition of other commercial values dependent on the forest and alpine land base. The public benefits from tourism through significant contribution of tax dollars to the province, local employment, development of mechanized and non mechanized recreational opportunities, provision of guided services for higher risk activities, educational and stewardship, local emergency response. Other?

Q2) What information do you want access to that will help inform your feedback on forest and range plans that may impact you, your community or your business.

The information contained in the answer to Question 1.2 plus maps of cutblocks and roads planned for the area, hydrological assessments, wildlife habitat areas, recreation opportunities. Information provided by stakeholders needs to be considered more than feedback. It needs to be considered and rationale provided on how the plan addressed it.

The province needs to invest in and provide tourism resource feature inventory to provide up to date information to the planning process the same way its provides forest inventory information.

Q2.2) What values do you think forest licensees need to consider when they prepare plans for new roads, road use and maintenance, or road deactivation? Consider issues such as liability, road user safety, wildlife habitat, hydrological effects, and other environmental considerations.

Foresters need to focus on environmental (wildlife, ecological sensitivity and connectivity, road density and connectivity), economic (forestry and other economic uses i.e. tourism, for existing and immediate future developments), and social and culture values associated with public recreation and spiritual uses. These values need to be identified by qualified professionals and have legal objectives established by a independent decision maker.

Q3) How could the province identify opportunities and priorities for adapting forest management to a changing climate, such as mitigating the effects of beetle infestations, drought and fire?

BC is one of the most ecologically diverse places in the world for a reason, Proximity to the pacific, topography, coastal and interior climatic conditions provided the ecological environment we have today. These factors make it extremely challenging to predict how this will change over the next 25-50 years. Managing for a mix of ecological systems both historic and new is essential in maintaining the diversity BC enjoys into the future.

This is a very complex issue better answered by ecologists, climatologists, biologists and foresters. The science community has addressed this question over many years but there has been little to no government response to these recommendations.



The process includes decision makers using biogeoclimatic predictive mapping on changes to the ecological make up of the province resulting from climate change. Since the changes from insect epidemics, increased wildfire and drought are already occurring this should provide some good bench marking to ground truth the predictive mapping.

Matching plant species to the new biogeoclimatic realty is the next step and the most challenging. Deployment needs to use ecological connectivity mapping to identify corridors and zones for assisting in the migration of plant communities and wildlife. Using existing species from the pacific north west and establishing ecological units in a matrix will provide the greatest chance of success for transition.

Planting mono culture forests as is occurring now is the worst possible outcome from an ecological, economic and social outcome perspective. Leaving zones existing undisturbed areas to evolve on their own including areas of old growth is essential from a gene pool and natural succession perspective.

Q3.2 What factors should be considered in the planning of forest operations to reduce the risks of wildfire around your community?

Follow and deliver on the Filmon report from the after math of the fires in 2003. Up dated predictive mapping will be useful to determine priority deployment. The report recommendations and actions are well documented and proven to work.

Allowing for mixed deciduous forests to grow to maturity in fire prone areas (any where in the provinces interior) will create natural fire barriers. Planning and managing for 1000-hectare pine stands without any natural barriers continues to promote wildfire. Allowing for forest stands to grow right up to communities perpetuates high risk wildfire situations and loss of life and assets. Managing for mixed stands of forests allows for more ecological diversity, decreases the chance of insect populations reaching epidemic levels and can create natural forest fire barriers. Managing forest harvesting slash in a different manner would be a secondary line of defense.

Q3.2) How could the planning of forest operations address the cumulative effects of forest operations and climate-induced natural disturbances on forest values

To answer this question, you need to take a different approach; this is not an operational planning issue, it is a forest management issue to be addressed at the provincial scale. As long as the primary objective remains maximizing fibre production (and associated mono culture of tree plantations) we will continue in the current fire ecology paradigm whether its climate caused or human caused.

This requires a change from the current forest planning and management objectives for optimizing or maximizing fibre production to forest and range ecological integrity and diversity. This will reintroduce natural low cost means of combating or mitigating climate change and natural disturbance.



Q4) In what ways could government strengthen the Minister's ability to manage forest and range activities to better address the interests of communities and Indigenous Nations, and the challenges posed by climate change?

The Minister and government need to make a foundational shift in the current FRPA legislation and governments objectives for forest management. The legislative frame work is sound but incomplete.

Required changes:

Shift from

a) Forests are managed for fibre production for the forest industry

to

 Forest are managed for ecological integrity for multiple economic, social and cultural benefits including forestry, tourism, botanical (commercial and personal, recreation, cultural) recreational, spiritual.

Shift From

 Regulatory language that gives the forest industry preferential uses of forest resources

to

- Regulatory language that requires independent decision makers to make choices on the highest and best uses of forest resources on an integrated planned and management basis
- c) Use legal objectives to protect a range of forest values.

Shift from

 Forestry planning that considers forest harvesting to meet AAC allocation at the expense of other uses and values

to

- b) forest management that considers ecological integrity of the forest first and
- c) makes provisions for economic social and cultural considerations in a balanced approach

The Minister needs to diversify the representation on the Forest Resources Advisory committee. The forest industry is very well represented, other interests are absent or under represented. If the purpose of this committee is to provide a range of perspectives on the management and use of this public resource then a balance of perspectives needs to be present.

Q5) In what ways could FRPA be strengthened to enhance innovation and promote continuous improvement in forest and range management in B.C.?

Government needs to decide whether it wants to do minor changes or significant changes to FRPA.

Minor changes will result in the status quo and accelerated consequences including:.

- Further degradation of forest ecosystems and the wildlife that are dependent on them,
- Lost opportunities and job losses for both the forest industry and other industries like tourism and botanicals that are dependent on intact forest ecosystems as a foundation for their businesses.
- Continued mill closures and community, social and cultural losses.
- -Continued growth and losses from wildfire.
- Loss of natural forest ecosystem genetic pools

Significant change can result in:

- A shift in forest management from managing for fibre production with a primary focus for forest harvesting to forest ecosystem management that manages for multiple values and outcomes for forest utilization.
- A science informed approach to vegetation adaption /ecosystem migration and establishment
- Rebuilding of wildlife and vegetation community diversification leading to a reduction in species at risk. Maintenance of natural forest ecosystem genetic pools.
- Rural communities that have diversified and stable economies
- Forest and other industries that return higher value to the province industry

These changes require a significant vision and cultural shift within government and industry to effect the changes that a required to stop the downward spiral in forest utilization, ecosystem loss and degradation of the land base for other industries like tourism.

The changes required in FRPA include:

Shift from managing forests to meet mill supply demands and ACC targets to meet ecological integrity targets that achieve forest species mix and composition, wildlife species, economic output / mix targets (for forestry, tourism, botanicals)

Shift to legal objectives for all significant forest ecological and social, social and cultural targets.

Empower decision makers and the Forest Practices board to assess compliance with and enforce the act.

Hold Professionals, Professional Associations and corporations legally accountable for their recommendations and actions. Employers are held legally account under Work Safe regulations. Professionals need to be held with the same rigour and consequences



The Wilderness Tourism Association thanks the province for the opportunity to participate in this process and looks forward to working constructively to effect the change necessary to meets the future needs for our communities and ecological systems.