

July 12, 2019

Honourable Doug Donaldson
Minister of Forests, Lands, Natural Resource Operations and Rural Development
Government of British Columbia

via email: FLNR.Minister@gov.bc.ca and engagefrpa@gov.bc.ca

Dear Minister Donaldson,

Re: AME Comments on Forest and Range Practices Act Discussion Paper

The Association for Mineral Exploration (AME), on behalf of almost 5,000 members, appreciates the opportunity to provide comments on the discussion paper, *Forest and Range Practices Act Improvement Initiative: Renewal and Resilience*. Our comments are directed at the resource roads portion of the discussion paper and focus on three main points: ensuring continued access to mineral tenures and areas of BC with high mineral potential; improving communication and consultation with all tenure holders and road users when changes to access are contemplated; and supporting a standardization of road-use rules to maximize safety.

AME represents members who rely on accessing British Columbia's network of 700,000 kilometres of resource roads – ranging from access by all-terrain vehicles and light trucks for prospecting through heavy equipment for drilling programs. Certainty of access is important for exploration companies to finance, plan, permit and carry-out exploration activities. It is in this context that AME provides its comments on the paper. In most locations in BC, the only alternative to using resource roads is using an expensive, fuel-intensive helicopter. For many exploration companies and almost all prospectors, helicopters are cost-prohibitive. Resource roads provide a cost-effective, on-the-ground means of access to remote mineral exploration activities. Early-stage mineral exploration require a maximum search area to explore for BC's hidden mineral resources which is enhanced by road access allowing exploration to occur during travel time and along road-cuts in a cost-effective manner.

We appreciate the inclusion of an incremental approach to resource road legislation and the incorporation of landscape-level planning into the Forest and Range Practices Act framework. We acknowledge that this will be a gradual process, and we urge the province to take the position that resource roads are a provincial asset that should be maintained by the province for the people of BC. As minerals are a hidden resource that together with forests are managed by the province, we urge the government to safeguard continued access to mineral tenures, and to ensure that mineral potential is incorporated into the planning process before decisions are made that affect access.

AME would like to emphasize the importance of transparent decision making and consultation to ensure that mineral tenure holders and other users are given an opportunity to respond when considerations are being made about the future use of resource roads. Often mineral tenure holders are either not consulted on road access changes or are only consulted when deactivation is imminent. We recognize that road deactivation may benefit preservation of ecological values and reduce user liability. However, given the time required to discover and assess hidden mineral resources, certainty regarding road access is fundamental to mineral exploration. We urge that the province provide early notice to users when deactivation is contemplated and provide opportunities for users to collaborate and suggest alternatives to full deactivation where practical.

AME also supports standardized road use rules to maximize safety as well as a revised approach to road maintenance disputes that allows for the transfer of liability between users. We note that many users have limited resources for maintaining roads and welcome an approach that provides time and a structure for multiple parties (e.g. First Nations, mineral tenure holders, recreational users) to collaborate on approaches to road maintenance that is managed by the province.

AME encourages your questions and discussion on our comments. Please feel free to contact me at 604.630.3920 or by email at kjohnston@amebc.ca.

Sincerely,



Kendra Johnston, PGeo, MBA
President and CEO
Association for Mineral Exploration

cc: Hon. Michelle Mungall, BC Minister of Energy, Mines and Petroleum Resources
Hon. George Heyman, BC Minister of Environment and Climate Change Strategy
Michael Goehring, President and CEO, Mining Association of British Columbia
Greg D'Avignon, President and CEO, Business Council of British Columbia
Regional Exploration Groups
Land Access and Use Committee, AME
Board of Directors, AME