



**BACKCOUNTRY
HUNTERS & ANGLERS**
BRITISH COLUMBIA

Honorable Doug Donaldson,
Minister of Forests, Lands, Natural Resource Operations, and Rural Development
PO Box 9049 Station Provincial Government
Victoria, BC V8W 9E2

July 12, 2019

Dear Minister Donaldson,

RE: FRPA Improvement Initiative

The British Columbia Chapter of Backcountry Hunters and Anglers (BCBHA) represents hunter-conservationists throughout the province who are dedicated to the conservation and proper management of our public lands. BCBHA welcomes the opportunity to comment on proposed improvements to the Forest and Range Practices Act (FRPA) to strengthen the legislation for the benefit of ecosystems and wildlife.

Generally, BCBHA supports the improvements to FRPA that have been proposed in the *Forest and Range Practices Act: Improvement Initiative, Renewal and Resilience Discussion Paper*. In particular, we support the development of landscape level management plans that include measurable objectives to mitigate the cumulative effects on the landscape from industry, forestry, recreation and development.

Management of wildlife, habitat, access, trail density, roadless areas, water quality and biodiversity need to be incorporated into landscape level planning and will require integration between FRPA and other legislation and ministries. We would like clarity on how FRPA improvement will be aligned with the recommendations and legislation that emerge from the ongoing Improving Wildlife Management and Habitat Conservation process. We have advocated for the following objectives during the IWMHC process to improve wildlife conservation and habitat values and believe that these same objectives need to be incorporated into landscape-level plans created under FRPA:

1. Require resource extraction and development to have net-positive impact on biodiversity, water quality and critical wildlife habitat.
2. Develop access management plans that include clear and enforceable road and trail densities with thresholds based on the best available science for fish and wildlife protection. Road and trail density should be monitored and density reduced through deactivation and reclamation where necessary.



3. Maintain and increase roadless areas to improve habitat connectivity and protect sensitive ecosystems and critical wildlife habitat.

For landscape level management to succeed, FRPA needs to be revised to provide clear, enforceable legislation that mitigates the impacts of industry and recreation on ecosystems, habitat, and wildlife populations, incentivizing conservation leadership and penalizing infractions. Issues such as the spread of noxious weeds/invasive plants and road deactivation need to be addressed at the beginning of the planning process with successful and timely mitigation incentivized. Conversely, penalties consistent with the Wildlife Act need to be enforced when damage to sensitive ecosystems and critical wildlife habitat, even at a local scale, by recreation or development occurs. Notably, tools need to be developed that allow FRPA regulations to be enforced outside the province to specifically address recreation infractions by non-residents.

Importantly, we believe that industry should not police itself, but rather the provincial government should shoulder the responsibility for overseeing compliance with FRPA legislation and protecting our landscape in the public interest.

As part of building the public trust, the province should provide regular reports on plans and compliance that are easily accessible on-line. Reports should focus on data-driven content that presents cumulative impacts on the landscape, impacts on fish and wildlife habitat, and impacts on roadless areas. Detailed maps depicting multi-year projections should be available as part of these reports. Maps should show planned harvest, cumulative effects, critical wildlife habitat and other sensitive ecosystems, and road/trail networks and density.

The commitment to collaboration should also include the formation of stakeholder advisory groups that meet regularly with government officials and industry to ensure the transfer of information and effective decision making. BCBHA would welcome the opportunity to participate in such advisory groups and share information learned with our members and the larger conservation community.

Thank you for the opportunity to provide feedback on the improvement of forest and grassland management in British Columbia.

Yours in conservation,

Alan Duffy
Chair – BC Chapter

cc. engagefrpa@gov.bc.ca





WWW.BACKCOUNTRYHUNTERS.ORG/BRITISH_COLUMBIA_BHA
BRITISHCOLUMBIA@BACKCOUNTRYHUNTERS.ORG