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To whom it may concern:

BC Whitewater is an organization that represents the interests of river-runners -- kayakers, rafters, paddleboarders, etc. -- around the province. We focus on maintaining and improving public access to rivers and working to keep whitewater reaches free-flowing. In that capacity, we're reaching out to provide feedback on the ongoing Forest and Range Practices Act public engagement.

The Act governs a broad spectrum of public land management issues in BC. Our feedback is primarily focused on recreational access and procedural transparency. Forestry roads are a complicated issue -- they can impact wildlife, water quality, and more. They are also important access corridors for many of the rivers in BC. We feel that road construction should be approached conservatively, but that to maximize value when roads are deemed necessary, recreation access needs to be part of the conversation. Any area that is being considered for a road should also be considered for its recreation potential, and recreation access should be part of the calculus of determining whether or not the road should be built -- and specifically, where and how it should be built.

As a corollary to that, we feel that plans for new forestry roads must consider the potential recreational use. Recreation has an impact and if we are building access roads, we must also be able to support the increased use those roads will bring to the area. Recreation infrastructure is an important part of any wildlands planning and thus far has not been part of the conversation.

BC Whitewater also strongly supports transparency in government land management planning. Modifications to the FRPA must include public engagement processes at every step of the way, and -- probably more importantly -- proposals and planning need to be easily and publicly accessible on the internet. Maps of cutblocks and roads -- historical, present, and future -- should be available to the general public through modern geospatial visualization technology, as should any assessments (hydrological, wildlife habitat, etc.) that occur during planning processes. Finally, any decisions made by the provincial government with regards to forest planning should be accompanied by documentation of why that decision was made, how the public was engaged, and how the decision plays into regional holistic management plans.

Thank you for your time and looking forward to see what comes from this process,

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