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The Commercial Bear Viewing Association (CBVA) was founded by like-minded eco-tourism operators to promote sustainable bear viewing in British Columbia and aid in the protection of wild bears and their ecosystems.

The CBVA consists of 27 member companies and hundreds of guide members that have been trained and certified through our bear viewing guide course. Member companies offer trips throughout British Columbia to view grizzly, black and Kermode bears in remote wilderness settings. With many years and thousands of incident-free viewing in the company of wild bears, our members are justifiably the leaders in this industry.

We have been part of the \$2 billion Adventure Tourism sector in BC for over 20 years. While we depend on a well-managed forest sector for the sustainability of our business and the health of BC's natural environment, forest management related issues have been the main challenge to the continued viability of our business. Bear viewing is a remote and rural economic driver for the province. An audit of 16 of the leading bear viewing operators in 2016 showed that an annual income from grizzly bear viewing alone was \$13.1 million. The industry employs both full-time and seasonal employees and is a growing sector in British Columbia.

The current Forest and Range Practices (FRPA) legislation is largely biased in favour of timber harvesting to the detriment of any other economic activity on the land base, bear viewing being one of them. Unfortunately, the forest management regime over the past 15 years has led to a degradation of BC's backcountry, especially when factoring in the effects of climate change, wildfire impact, and increased pressures from industrial and non-industrial uses. Without this wild habitat, bears are moving to different areas of the province in search of food and habitat. The impact will be on the rural communities if coexistence models are not employed or consideration for other activities is not considered.

From our perspective, BC's forests need to be managed, not administered as they currently are. One step toward that process should be the development of a broad and updated vision for the utilization of our forests that goes beyond supplying fibre for dimensional lumber and strand board. This vision would include a more diverse and integrated economy that leads to a healthier socio-economic climate for rural British Columbia.

Simply put, it is time for a change. It is time for British Columbia to be a leader in managing our natural world. The culture that has existed in BC, extraction, cannot withstand much more in light of climate change. It is time to think of British Columbia as more than fibre supply for sawmills and more on what else depends on the forests. Forests are important culturally, spiritually, and locally for food sources. Through tourism and recreation, forests bring both commercially guided, and recreation uses that are known worldwide. With the province's marketing campaign's motto "Super, Natural British Columbia™," we can only remain this way if we maintain what is super and natural about it, the forest.

Evolving and developing BC's bear viewing industry



1. How should 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?

The province needs to take a different approach to forest management, such as managing plant species. Managing plant species is a very complex issue that requires ecologists, climatologists, biologists and foresters. We believe that having an advisory committee of these experts will help with understanding what is required for the province.

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

The province needs to be more proactive in its approach to fire management including; follow-up and implement many suggestions contained in the 2003 Filmon Report; updating predictive mapping could be useful to determine priority deployment Work with the local community to create interface priority zones, which will allow the forest industry to access more timber. Ensure that local knowledge is utilized when planning for, or fighting a fire. Continued education for public knowledge with a province-wide campaign on the effects of human-caused fires, coupled with increased compliance and enforcement to aid in the deterrence of careless human behaviour is essential.

3. A vital step in landscape-level planning is understanding what is important to the public. Based on what is important to you or your community, what information on the condition of resource values such as species-at-risk habitat do you think is necessary to support the planning process?

Consider values other than traditional harvesting values. At present, tourism is an unknown value for forest practices. Expanding and legalizing other values under FRPA and taking into consideration their wants and needs, outside of resource extraction will help in driving the economy outside the traditional mindset and allow British Columbia to set itself up for a resilient future.

4. How would you like to be involved in the planning process?

Business certainty is key for all 27 member companies. Therefore, communication from the government, at the local level, on planned cutbacks is essential to maintain business success. It is essential for member companies to be a prime consideration in decision-making processes in their operating area and having a key point of contact with both local government officials and forestry companies.

5. Resource roads are a valuable asset in the province as they provide access for the forest Industry, ranchers, other resource users, and the public for commercial and recreational purposes. These same road networks are costly to maintain and have potential negative impacts on wildlife, water quality and fish habitat. What values do you believe are important



to consider when planning new roads, road use and maintenance, and deactivation in your area?

Road planning, construction and deactivation should consider overall road density (need to minimize), connectivity, the necessity for future access, deactivation timelines (while considering the socio-economic value to adjacent communities). As well, impacts on wildlife, water quality, fish habitat, other resource access, public recreation access, terrain and snowpack stability, etc.

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 cultural values associated with public recreation and spiritual uses. These values need to be identified by qualified professionals and have legal objectives established by an independent decision maker.

6. How can the Province improve transparency and timelines of information regarding proposed operational and landscape-level objectives, plans and results?

The province should be proactive in its outreach program establish list-serves for interested parties, create a digital portal that will allow interested community members access to forestry planning, hold planning forums for information on new plan objectives in local areas.

7. What information will help inform your feedback on plans that may impact you, your community or your business (e.g., maps of cut blocks and roads planned in your area, hydrological assessments, wildlife habitat areas or recreation opportunities, etc.)?

Provide detailed information to interested parties in a timely, easy-to-use digital format — the use of modern digital technology to create a robust and responsive layered mapping tool. The layered maps could provide the location of all resource roads, cut blocks (planned or current), viewscape management (VQOs), planned timing of timber harvests, road construction, other tenures, parks, SARCO areas, etc.

As well, 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 it provides forest inventory information.

8. What additional values should be considered in FRPA that will allow us to manage forest and range practices in a better way?

FRPA considers some tourism and recreation values when they are made legal but ignores many others. We need FRPA to recognize other values of the forest legally. Constructed assets such as trails, cabins, lodges, camps, access points and other capital investments, etc. need to be considered. Natural assets such as viewscales, wildlife habitat, fish habitat, riparian margins, etc. should also be factored in FRPA.



9. In what ways should the province strengthen government oversight and industry accountability regarding forest and range activities to better address the challenges of climate change and the interests of all British Columbians?

The province needs to regain legal authority over forest management and shift its vision from optimizing fibre production and forest jobs to maintaining forest health and increasing economic diversification on forest lands. The BC Government needs to manage this valuable resource, not administer it. In many cases, licensees have demonstrated they are mainly interested in optimizing fibre harvest and not the long term well being of BC's forests. Their role should be confined to that function. The province should retain the role of managing forest resources.

Licensees/ companies and the foresters that work for them need to be legally accountable for their actions in forest management. An example of strong corporate accountability is the BC Workers Compensation Act. Strong legislation like this would address the lack of professional accountability in this industry and many others.

The role and mandate of the Forest Practices Board should be expanded to more effectively encourage compliance and provide for appropriate enforcement where and when needed.

The Minister and the government need to make a fundamental shift in the current FRPA legislation for a continued Super, Natural British Columbia™.

Shift from

- a. Forests are managed for fibre production for the forest industry

to

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

Shift From

- a. Regulatory language that gives the forest industry preferential uses of forest resources

to

- b. 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

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



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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.

With these shifts, a change of engagement to the Minister is essential. The forestry industry is well represented. Other interests are wholly underrepresented. To provide a wider range of perspectives, the inclusion of other interests and values is necessary for a more balanced approach.

The CBVA thanks the province and the Minister for the opportunity for feedback into this critical issue. We thank you for the participation and look forward to working collaboratively to effect the necessary change that will enable the future of the province, our communities, and their ecological systems.