

## **FRPA Feedback from Spirit of the West Adventures**

We have been in business for over 20 years, employ nearly 60 people, host over 1100 visitors to every summer and have sales of over 1.8 million which is multiplied as a benefit and economic contribution to the province by the associated travel and spending of these visitors who typically spend at minimum a week in our province.

Our company is one of many tourism businesses that extract value from crown forests while the trees are standing. Our industry must be considered on an even playing field with extractive forest activities as the ministry is truly to execute its mandate to manage forest resources for all users of provincial forest resources.

Below are responses to the questions asked in the survey in no particular order. The feedback below often can be applied across more than one of the topic/question areas.

- A revised definition of Old Growth needs to include Old Growth forest ecosystems and their characteristics, not only the age of the individual trees.
- Road Planning and 'operational issues' should also not trump the importance of these Old Growth areas to the larger ecosystem to ensure resiliency when it comes to climate change.
- Recognizing that carbon capture and storage from Old Growth retention is significant in managing for climate change. Please consider long term and big picture value of standing trees and forests versus only reactive post-harvest mitigation strategies such as species types for replanting etc.
- When assessing the value of forests as a crown resource, the value of the standing trees/intact forests as a carbon sink and venue for other uses of the forest i.e. tourism need to be considered. As Minister Donaldson has said many times it is his duty to manage the forest of BC for all people, not just dimensional lumber.
- The removal of the standing waste fines would help manage for sustainability and user conflicts within already permitted blocks allowing licensees more avenues to modify blocks based on feedback from other users.
- FRPA needs to provide a timeline/requirement for the review of the changing uses of the land base. For example, the Visual Quality Objectives which were grandfathered from the existing Visual Quality Classes are grossly outdated and does not accurately reflect the needs of the other users of Crown Land, but as long as a licensee has looked at these outdated maps they meet the requirements for their FSP's etc. The public needs reassurance that these inventory resources are reflective of actual uses, are being updated frequently and that there is an easy mechanism to provide updates to these inventories.
- Recreation and Tourism resource inventories need to be made a requirement for the province to maintain and update at minimum every 5 years, ideally with on-going/real time data addition capability. This should not be left up to the licensee who can stall the creation of the document until cut permits are applied for. The discretion of the District Manager to ask the licensee for an updated recreation resources inventory also needs to be removed and this become a required part of due diligence of the province. Having the licensee hire and pay for the inventory also presents an avenue for bias to affect the findings of such a document.
- Communication and co-ordination between land and water policy needs to be considered in revised versions of FRPA and its associated land-use planning. Having a marine protected area (even if it is federal jurisdiction) downhill from forestry operations and associated sedimentation, run off, noise and disturbance associated with harvest activities, herbicide use, and plantation ecology is not compatible. It is also very short sighted and increasingly frustrating

for the public to provide comment and feedback regarding landscape planning but knowing that you need to do it all over again for above or below the high tide line.

- When examining areas covered by agreed upon land-use plans but in response to natural disasters etc., FRPA needs to consider the effects of forest fire, disease outbreaks etc. on other forest users who may still benefit from standing trees even if they are dead. Timber must not be the only value associated with forests regardless of the state they are in.
- The duty of licensees to consult with the public who will be affected needs to be a requirement versus a courtesy- this leads to an unlevel playing field right from the start.
- The language of FRPA and surrounding forestry processes needs to reflect the variety of uses of crown forests. The idea of it being a Timber Supply Area versus a Forest Resource Area (or something similar) starts the conversation with the bias that forests are only for timber production versus having other values which should be considered equally important.
- Definition of recreation as a resource value that is managed for needs to include tourism and recreation.
- Forest Stewardship Plans are much too vague to ensure the conservation of identified resource values. The results and strategies outlined in an FSP being so vague, technical and not area-specific make it almost impossible for the public to provide meaningful feedback and therefore to be able to shape future forestry activities in the areas that will affect them. Combine this with attempting to comment on the many FSPs across the land base (which could easily be a full-time job for the public to actually keep up with), with the fact that unless there are major changes to the FSPs that they get renewed for additional terms without opportunity for public feedback, then the hands of District Managers being tied to refuse cut permits once the FSP has been approved and you have the current state of lack of trust, discontent in how these crown resources are being managed and subsequent protests etc.
- There are needs to be more clarification around what a recreation resource is and isn't. It needs to include tourism and recreation areas outside of just provincially designated recreation sites and trails. Land use planning has been stalled in the province for many years and there has not been much of an appetite of adding new recreation sites, parks, conservation areas etc. which means that many high-use and high-value tourism and recreation sites currently do not have an official designation which leaves them unmanaged for recreation and tourism values. Even with a renewed land use planning process there will always be areas outside of officially designated recreation and protected areas that need to be managed for tourism and recreation values. The language of a revised FRPA needs to reflect the importance and value of the Tourism and recreation industries to the province and acknowledge their use and dependence on forest resources in a non-extractive way.
- To truly work towards UNDRIP Hereditary and Elected Chief and Council need to be consulted and involved in forest planning and practices.
- A dispute resolution mechanism needs to be introduced to arbitrate when conflicting issues/uses cannot be resolved between the parties involved i.e. the public or business versus forest industry. This impartial board/judge would help level the playing field when it comes to understanding all the forestry systems, language and technical documents and ensure that someone truly is looking out for the best interests of the people of BC when it comes to managing our crown resources.
- The Forest Practices Board needs to be given true power. Their recommendations and findings need to be acted upon and enforced.
- Enforcement and Compliance needs to be built into FRPA and needs to be proactive versus reactive and public complaint driven. Fines also need to be dramatically increased and followed through on, currently FRPA's reliance on professional reliance is leaving the work up to the

already overloaded public. If a licensee is not meeting their legal requirements, it should not be up to the public to drive the process of discipline. The fines issued so far are so low that it is more lucrative to ask for forgiveness than to abide by the rules with also leads to the lack of public confidence in forest management.

- Site level planning needs to be publicly available in a centralized and easy to access website (similar to the Discovery Islands Tourism and Forestry working group model). The current need for the public to have to track down the licensee, make appointments to ask to see site plans and then provide feedback which doesn't really need to be incorporated in any meaningful way because the FSP has already been approved leads to major discontentment and a lack of trust in the forest industry as a whole.
- While outside of FRPA, TSA's and AAC's will need to be adjusted to reflect the proposed changes to FRPA. The other concern we have of the changes to FRPA are 'a gold-rush mentality' to log what you can while you can as we have witnessed before the introduction of changes to legislation and land-use policy in the past. The introduction of a review board to oversee cut permit application and forest activity during the transition period would be prudent and help ensure public trust. Clear communication to the public about the rules surrounding the transition period and timelines for changes will help the public to meaningfully contribute to ongoing dialogue regarding forest activities in the meantime. Minimize the grandfathering of cut plans that would not meet the new requirements of FRPA.
- While it is great to ensure that community and the public are more involved in landscape level planning there needs to be stakeholder funding to recognize the time commitments this involves for other users of the forest.
- Cross-ministerial involvement also needs to be a priority for land-use planning. Having representatives from the tourism ministry and others involved must be built into land-use planning processes.
- FRPA changes should necessitate the introduction of additional positions within the Ministry of Forests Land and Natural Resource Operations and Rural Development for managing recreation and tourism resources along with the other resource values identified. It appears that the majority of provincial resources are currently allocated to positions that are associated with the planning and removal of the forests versus dedicated positions that examine the values and benefits of the intact forest resources of the province.
- FRPA should "help to create certainty for current and future forest operations", but also all other users of forest resources. Timber values must be put on the same level as all other uses of the forest i.e. tourism and recreation in order to ensure certainty for all business interests and stakeholders.
- Road maintenance and access is in my opinion a secondary concern to the way roads and road building expense is used to justify increased harvests or harvests of areas that have high value to other users of the forest. Putting roads through high value timber stands (often old growth) for 'operational reasons or efficiency' to access timber that would otherwise be protected needs to be addressed and eliminated. Land use planning and the associated values including ecology and other stakeholder needs to trump the costs of road building and maintenance in order to have any legitimacy in the eyes of the public and stakeholders.
- As a tourism business and sector representative (Vice-president of the Wilderness Tourism Association and board member of the North Island Marine Mammal Stewardship Association), I know the importance of land-use planning and involvement. This said there needs to be some streamlining of the processes in order to somehow incorporate feedback heard in the various areas across the province. There is also a great need to start these processes with updated supporting resources- provided by the government to make it manageable for stakeholders to

contribute in a meaningful way i.e. recreation resources inventories, visual quality objectives etc.

- There needs to be easier ways to adjust visual quality objectives and incorporate the needs of other forest users than a Government Actions Regulation (GAR) order. The GAR process is arduous at best. The tests that must be met also need to be revised- in particular that the changes 'not unduly impact the supply of timber in the province' and 'not unduly effect the licensee'. This is so very biased in favour of licenses which is not representative of the mandate of the ministry to manage forest resources for all people of the province.
- The current time required to initiate and rule on a GAR order change also just leads to a licensee pushing through cut permits which a District Manager cannot refuse once the FSP is approved. GAR is not a responsive tool to make changes. The GAR process again needs to be initiated and driven by public rather than proactively used as a tool to manage forest resources for all stakeholders.
- It is difficult to discuss areas in question when forestry is using proprietary inventory i.e. lidar to argue forest types, ecology etc.
- There also needs to be public access to some of the information currently considered proprietary by licensees i.e. lidar mapping and inventories. It should be a requirement that they be able to prove to the public that they are in fact meeting the requirement of landscape reserve design and other land-use management and planning tools, versus the idea that we should just trust their inventories and plans on site specific and large-scale levels. This should be available to the public and ministry officials to be able to 'ground-truth' and fact check. This would help with public trust and transparency.
- Tightening the use of judgement or professional reliance within FRPA and its elements would help increase public trust. One particular example would be the broad ranges of percentage disturbance when it comes to visual quality objectives. The two ends of a VQO range i.e. Partial retention 1.6-7% lead to two very different outcomes.
- FRPA must allow for public influence and then accommodation of the needs of other forest users and stakeholders at various stages in order to be effective. The current model Management Plans and then FSP's- which once approved lead to the inability to then refuse cut block applications is very flawed. Even if the public can see operational plans for 5 years out, these change in response to markets for products, pest outbreaks, forest fires and the list goes on, but the public then does not have another avenue to provide updated or timely information/influence on outcomes other than through the goodwill of a licensee. Ministry officials need to have more discretion in order to accommodate other forest users and stakeholders on a case by case basis.

Thank you for your time and consideration,

Handwritten signatures of Breanne Quesnel and Rick Snowdon, separated by an ampersand (&).

Breanne Quesnel and Rick Snowdon  
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