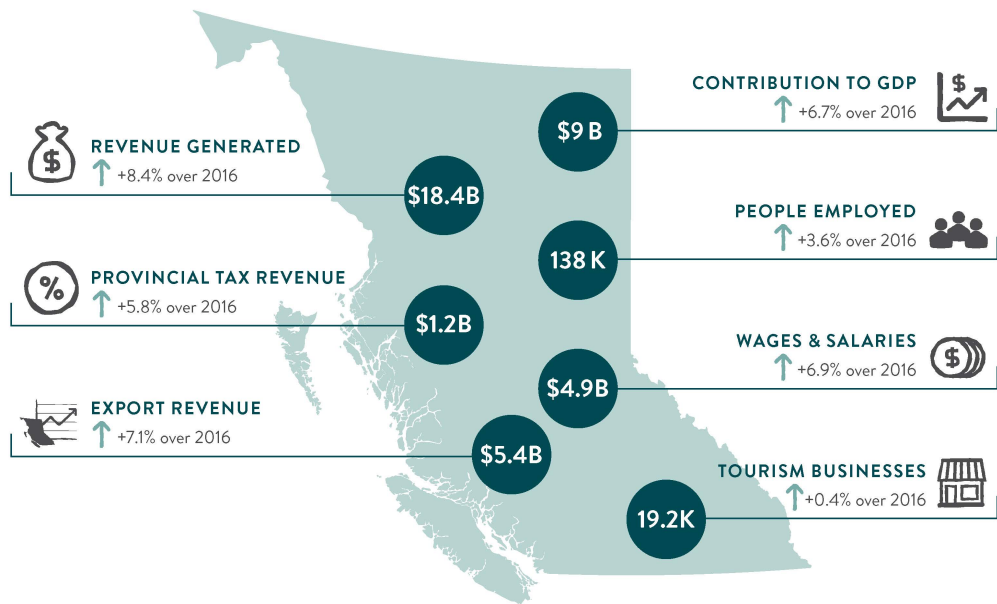


SUBMISSION ON AMENDMENTS TO THE FOREST RANGE & PRACTICES ACT

Submitted by the Tourism Industry Association of British Columbia
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2017 Value of Tourism



Sources: BC Stats for Destination BC, and derived by Destination BC based on the International Travel Survey from Statistics Canada



Introduction

The Tourism Industry Association of BC (TIABC) advocates for the interests of British Columbia's \$18.4 billion visitor economy. As a not-for-profit tourism industry association, TIABC works collaboratively with its members – private sector tourism businesses, industry associations and destination marketing organizations – to ensure the best working environment for a competitive tourism industry.

TIABC's vision is for the tourism industry to be recognized as one of British Columbia's leading and sustainable natural resource industries. As the primary advocate for BC's visitor economy, TIABC unites operators, sectors, DMOs, government and residents to support and be passionate about making this province a great place for tourism.

On behalf of its members and stakeholders, TIABC is pleased to submit this brief with answers to the discussion paper questions and recommendations on amendments to the Forest Range & Practices Act.

The Importance of British Columbia's Visitor Economy

Tourism is a critical sector within BC's economy. In 2017 (latest statistics available), the tourism industry generated \$18.4 billion in revenue, an increase of 8.4% over 2016. The Adventure Tourism sector generates some \$3 billion of that revenue alone. In addition, tourism contributed some \$9 billion to provincial GDP through some 19,000 businesses that employ over 330,000 people, nearly 40% of whom service the visitor economy.

Aside from economic benefits, BC's visitor economy also generates social and cultural benefits for all British Columbians by supporting the viability of community amenities and increasing international exposure to our heritage, education system, trade opportunities and immigration prospects.

In spite of challenges with wildfires and flooding in both 2017 and 2018, and unlike many other natural resource sectors, BC's visitor economy continues to grow due to increasing demand for British Columbia's tourism products and services, largely attributed to the marketing efforts led by Destination British Columbia and its community and sector partners. Tourism is the province's third largest industry with potential for further growth, particularly within Indigenous and rural communities.

General Observations

A well-managed forest sector is paramount for the sustainability of Adventure Tourism (AT) businesses and the health of BC's super-natural environment. However, forest management related issues have hampered the viability of many AT business because current FRPA legislation is largely biased in favour of timber harvesting over any other social and economic activity on the land base.

Combined with wildfires, climate change and increased pressures from industrial and non-industrial uses, the existing forest management regime has led to a degradation of certain areas of BC's backcountry, especially over the last 15 years.

From TIABC's 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, particularly for rural British Columbia. Another key part of this vision is ensuring that tourism values are incorporated into all forest developing planning and within FRPA.

There is a definite need for a holistic land use and land management plan across the province to establish long term goals and strategies that allow all different user groups and users to plan and to invest. It would also allow government to identify working forests (i.e. forests used for a variety of industrial & commercial activities), recreational forests (forests used by the recreating public), and habitat forests with varying levels of access (i.e. road management), infrastructure (i.e. rec sites and trails), and protected status.

Forests are the lifeblood of our entire eco-system as a primary source for clean water oxygen and food, as well as habitat for wildlife and other foliage aside from trees. It is incumbent on all stakeholders to address this integral ecological footprint in British Columbia to ensure long-term sustainability on all fronts (environmental, social, cultural, economic), especially in the context of climate change, usage and reconciliation with Indigenous peoples.

TIABC is pleased to answer the discussion paper questions and provide recommendations as appropriate:

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?*

Instead of reacting to fires, droughts and other impacts on the land base, it is important to take a science-based, proactive approach. Diversifying forest uses can help to mitigate or eliminate the damage caused by various circumstances.

One idea is to situate working forests closer to communities and the public (without affecting values such as visual quality & scenic areas) to allow active management of the resource in the interest of harvesting and other commercial uses, as well as fire and disease mitigation.

Similarly, it is imperative to identify forests for recreational use, as well as forests needed to protect habitat, and implement a multi-stakeholder structure to oversee and manage the many and best uses, as well as values of forests instead of focusing on predominantly harvesting.

Clear guidelines would need to be developed, implemented and enforced to allow for multi-usage of forests in and around communities.

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

While it is encouraging to see government adopt many of the recommendations contained in both the Abbott/Chapman report on the 2017 wildfires and flooding, as well as the Filmon report that addressed similar issues, in general, government needs to be more proactive in its approach to fire management.

Managing for mixed stands of forests can create natural forest fire barriers and also reduce the chance for destructive insects to continue to populate and wreak havoc on certain types of trees (e.g. pine beetle).

The practice of prescribed burns helps address wildfire risks by consuming dangerous ground fuel left over after harvest. This practice could be better managed and utilized.

Updating predictive mapping could be useful in order to determine priority deployment opportunities, and allow the forest industry to access more timber with the approval of the local community.

3. *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?*

When identifying harvesting areas (cut blocks) it is important to define values, not only in economic terms (e.g. revenues generated by harvested timber), but on the corresponding ramifications for the loss of habitat, access and/or revenue for a tourism operator due to harvesting. While some of these values will require specific criteria or clear definitions in order to measure, the current approach and self-management of license holders is ineffective.

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

Sector associations representing all land base users (tourism, natural resources, recreation), as well as affected stakeholders such as tenure holders, communities, and businesses must be engaged when harvesting activities are contemplated in order to ensure stability in their operations, understand implications, prepare mitigation strategies, or communicate the ramifications of proposed activities. The planning process should be done on a regional basis using regional organizations as the conduit to engage stakeholders at various levels.

5. *What values do you believe are important to consider when planning new roads, road use and maintenance, and deactivation in your area?*

Roads are often critical access points for tourism licensees and public recreationists. Both groups should be directly involved in all aspects of road planning. It should be noted, however, that tourism licensees do not have the same opportunity as forest licensees to write off the costs of roads against stumpage. Consequently, it puts them in a very difficult position.

Road construction and/or deactivation should factor in environmental impacts on water sources and quality, fish habitat, trees and foliage, snowpack stability and other considerations such as density. As well, the implications for wildlife and species at risk need to be considered in addition to access/egress for the resource sector, public recreation and tourism.

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

A clearly defined, consistent and uniform communication protocol needs to be implemented province wide to ensure all stakeholders are informed and consulted regarding landscape-level objectives, plans and results. As part of the communication process, forest licensees (as primary users of the land base) should be required to show how the values and interests raised by tourism licensees have been addressed.

From a tourism perspective, tourism licensees need to be engaged in planning and decision-making for any activity that impacts trails, views and access. For example, before harvest areas are approved, operators should provide input, be involved in decisions, and where necessary, respond well in advance by adjusting their activities to mitigate any impacts of the harvesting activity. Currently the practice of one month’s notice is woefully insufficient.

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.)?

Aside from details of the impending harvest activity (location of roads and cut blocks, viewscape management, proximity to existing infrastructure, timing of timber harvests and operations, etc.), tourism licensees are keen to know what other future activity is planned that could have further consequences to their operation. Furthermore, they need to be involved in decision-making related to those activities.

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

Because tourism often relies on forests, and because tourism businesses act as champions of social and environmental values that enhance BC’s reputation, it is critical that tourism values be included in FRPA and associated regulations (such as Forest Practices & Planning Regulations). This will help ensure that forest planners consider tourism values, and that tourism licensees are directly involved in decision-making.

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?*

At present, forest licensees are not required to consider other non-timber related uses when planning for a harvest other than those specifically listed in the regulations. What's more, how those values are addressed is left up to the forest licensees.

Conversely, other resource users must inform themselves of forestry planning activities and specifically request to see forest companies' work plans.

Furthermore, under the Land Act, tenures for tourism operators and other recreation related activities provide little business certainty or recompense when business operations are interrupted or lost due to harvesting or other resource extraction activities.

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 crown land. The BC Government needs to manage this valuable resource, not administer it.

The apparent lack of professional accountability and the misguided notion of self-policing by some forest licensees have led to disastrous results environmentally and for other users of the land base in some areas of the province.

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

Summary of TIABC Recommendations

- A. Implement a multi-stakeholder, integrated structure to oversee and manage the many and best uses, as well as values of forests (recreation; habitat/environmental protection; harvesting/commercial) instead of focusing on harvesting;

- B. Further adopt crisis management recommendations as identified in the Abbott/Chapman and Filmon reports;
- C. Add tourism values in FRPA and associated regulations to ensure that they are identified and addressed (e.g. roads, rivers, lakes, trails, viewscapes, camps, terrain for snow activities, viewing areas, lodges, wildlife);
- D. Engage sector associations, businesses and communities in regional planning processes on land being contemplated for multi or singular usage; and
- E. Develop and implement a clearly defined, consistent and uniform communication protocol for engaging all stakeholders and involving them in decision-making.

Conclusion

The visitor economy, and the Adventure Tourism sector in particular, is not fully recognized as a sustainable resource user and viable economic opportunity in BC despite generating over \$3 billion annually in revenue and employing thousands of people in small businesses and rural communities.

At the same time, the sector is ready, willing and able to take the next step in working with government, Indigenous peoples, communities and other resource users to develop sustainable management practices such as landscape level planning that meet social, environmental and economic development objectives.

Thank you for the opportunity to submit our observations and recommendations. If you have any questions or comments, please contact me directly.

Sincerely,



Walt Judas
CEO, TIABC
778-953-0620
wjudas@tiabc.ca