



The Trails Society of
British Columbia
1247 Charter Hill Drive
COQUITLAM BC V3E 1P1

July 15, 2019

Minister Doug Donaldson

MFNLRORD

Sent by email to engagefrpa@gov.bc.ca

RE: Forest and Range Practices Act Consultation

Dear Minister Donaldson:

Trails Society of BC is a volunteer Society established in 1994 to assist the Provincial Government in establishing the Trans Canada Trail, since renamed, The Great Trail. We continue our dedication to advocate for and provide for quality trail experiences for human powered recreation (and active transportation) on The Great Trail and are expanding our interests to supporting additional greenway trails to link communities safely throughout British Columbia.

We support the work the government is doing to reform the Forest Range and Practices Act, and strongly encourage that the Province fully implement the FRPA recommendations in the 2018 Professional Reliance Review.

We very much support the removal of the clause, "without unduly reducing the supply of timber from British Columbia's forests" from FRPA's legal objectives. FRPA needs to be reformed to give equal

consideration to other natural resource management values, including but not limited to recreation, emergency response to climate change, wildlife and fisheries, watershed management, connectivity of habitat and biodiversity.

Trails Society of BC would like to see the new regulations incorporate the economic value of recreation and health and fitness, and the value of our rail trails and other trail greenways as active transportation corridors. We are looking forward to seeing public policy and legislation be better aligned with the other Ministries so that FLNRORD can work with other Ministries such as the MOTI and the MOE for more effective and integrated best practices. We believe there needs to be a cost-benefit analysis and appropriate and comprehensive public consultation involvement through FRPA reform before The Great Trail rail trails are used for forest extraction.

We support changes to FRPA supporting forest and landscape level planning that maintains and restores healthy ecosystems to support ecological, social and cultural values, including being respectful to the furtherment of reconciliation with Indigenous people and in alignment with the United Nations Declaration of the Rights of Indigenous Peoples.

Lastly, Trails Society of BC would like to see an acknowledgement that motorized vehicles are incompatible with trail users who want a vehicle-free and non-motorized experience. The presence of ORV users on rail trails because of the 'non-intervention' strategic approach by the BC government is greatly aiding towards the demise of, at minimum, 525 km of The Great Trail rail trails established in BC. The result is a major loss to BC residents and visitors because we no longer have quality non-motorized recreation on these trails.

Fundamentally, non-motorized and motorized users are incompatible on the same pathways and trails because the non-motorized user is severely impacted by motor vehicles while the motorized users are minimally affected when they share trails with non-motorized users. This

incompatibility needs to be formally acknowledged in government policy. We are fully prepared to support motorized users being accommodated on the land base, but it must first be understood that we cannot essentially allow mixing them with non-motorized users on the same trail. It is important that everyone work together with this end in mind. What appears to be a free-for-all that is presently being tolerated by the government is counterproductive when it comes to promoting quality active recreation, active transportation, and tourism on the TCT rail trail system.

We would like to see FRPA take into consideration that quality experiences are important for all of the public and not allow for “mixed-use” trails to become status quo for the rail trails, nor for other trails intended for non-motorized use.

Thank you for the opportunity to comment on this FRPA reform and we look forward to continuing the conversation with the Province and other stakeholders.

Sincerely,

A handwritten signature in black ink that reads "Ciel Sander". The signature is written in a cursive, flowing style.

Ciel Sander, Trails Society of BC
Board President
Greenwood BC V0H 1J0