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July 15, 2021

Member Municipalities

Sent via email.

Re: Protection of outdoor recreation opportunities and established snowmobile Recreational Sites or Trails in B.C.

To Whom It May Concern,

District of Sicamous (DOS) Council is seeking support from fellow municipalities to support two resolutions the DOS has agreed to sponsor from the BC Snowmobile Federation (BCSF) concerning the Forest Range & Practice Act (FRPA) objectives and site-level objectives for snowmobile trails.

Currently there are 53 non-profit snowmobile organizations across the province who hold partnership agreements with Recreation Sites and Trails BC (RSTBC) to maintain trails in return for operating on Crown land. Many of these non-profit organizations exist in rural communities and largely contribute to the local economies—\$299M annually according to the BCSF.

The BCSF notes that of the 11 values within the FRPA, recreation is the only value without declared objectives, and that without these declared objectives industrial licensees have no requirement to consider, consult, or coordinate activities with recreation groups who hold partnership agreements with RSTBC. Within the existing FRPA framework, recreation organizations are legally required to maintain trails without communication from industry and are not guaranteed the very trails they are responsible for managing are not disrupted by industrial forest activity.

As these resolutions address issues impacting rural communities across B.C. and a disparity within the provincial legislation of the FRPA, DOS Council endorses the resolutions presented by the BCSF and asks for support from member municipalities at the 2021 UBCM Convention.

Thank you in advance for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Rysz", is written over a light blue horizontal line.

Mayor Terry Rysz,
DISTRICT OF SICAMOUS

Encl. Protection for Outdoor Recreation Opportunities in BC
 Protection for Established Snowmobile Recreational Sites or Trails



British Columbia Snowmobile Federation

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FRPA Recreation Resource Value Objective (all recreation in BC)

Background

The BC Government brought the Forest Range & Practice Act (FRPA) into force in 2004. This legislation outlines parameters for how public lands and resources are managed within the province. Specifically, FRPA serves to align government, private, and public interests by defining values such as biodiversity, cultural heritage, and timber. These land 'values' are then assigned 'objectives' detailing how land users must work together and apply meaningful strategies to protect and retain these resources. Of the eleven FRPA values, recreation remains the only one for which the Ministry of Forests has never assigned 'objectives'. Without declared objectives, industrial licensees currently have no requirement to consider, consult, or coordinate their activities on registered public trails or around public recreational resources in the province.

We believe that FRPA land use objectives should encompass the values which are important to BC residents, our communities, and to the outdoor recreation sector with at least equal consideration.

Therefore, the BC Snowmobile Federation would like to propose the following regulatory change:

Proposed Objective

The objective set by government for recreation is, without unduly reducing the supply of timber from British Columbia's forests, to avoid or mitigate any adverse impacts to any recreation site, trail or facility that exists on Crown land.

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MISSION STATEMENT "The British Columbia Snowmobile Federation is dedicated to provide strong leadership and support to member clubs to establish, maintain and protect quality opportunities for organized snowmobiling in British Columbia and to promote the safe and environmentally responsible use of these opportunities."

Draft Resolution #1

Title: Protection for Outdoor Recreation Opportunities in BC

Sponsor: District of Sicamous

WHEREAS many local governments and communities rely on meaningful outdoor recreation for economic stability and development and, at the same time, those local governments and communities care about maintaining existing Recreation Sites and Trails Management and/or Partnership Agreements with the Province of British Columbia for respectful stewardship of the lands.

AND WHEREAS Government has established broad Forest Range Practices Act (FRPA) objectives under the Forest Planning and Practices Regulation (FPPR) for ten of the eleven FRPA values. They have not established an objective for recreation. Which makes recreation the only value without a FRPA objective and leaves recreation out of planning processes.

AND WHEREAS only the BC Government can set Objectives within the Forest Range Practices Act.

THEREFORE BE IT RESOLVED the Union of BC Municipalities asks the BC Government to allocate the necessary resources to create the following objective under the Forest Planning and Practices Regulation Part 2 Division 1:

The objective set by government for recreation is, without unduly reducing the supply of timber from British Columbia's forests, to avoid or mitigate any adverse impacts to any recreation site, trail or facility that exists on Crown land.



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Section 56 Individual Sites & Trails Objectives (snowmobile specific)

Background:

Section 56 of the Forest Ranges and Practices Act (FRPA) allows the government to establish or disestablish recreation sites, trails and interpretive forest sites. It also allows the government to establish Site Level objectives for these sites or trails at the time they are established or by amendment at anytime. This can easily be done by the authorized designated decision maker which is often the Recreation Sites and Trails BC District Manager.

Snowmobile Clubs across BC enter into Partnership Agreements with the Government to ensure the provision of safe, sanitary, socially acceptable and environmentally sound recreation sites and trails for public use. This is done through the investment of many volunteer hours, user fees and fundraising by BC Snowmobile Federation (BCSF) Member Clubs to support trail maintenance efforts. However, under the current FRPA Framework, snowmobile clubs are not even assured that the services and recreation sites they are responsible for managing will not be disrupted by industrial forest activity. Licensees are not currently obligated to consider, communicate, or mitigate any snowmobile trail disruption in their Forest Stewardship Planning. The BCSF has been told that Industry must only plan for and consider sites where a government registered objective is set and where their operations might impact that established objective.

For the snowmobile sector many snowmobile trails have been established under FRPA Section 56 but in a recent study completed by the BC

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Snowmobile Federation it is clear that almost all have no site specific objectives set. The only sites that have objectives were established prior to 2004 when FRPA was enacted. These have vague objectives that have little meaning in today's working forest and do not properly reflect the tourism value of snowmobile trails today.

Also, many of our registered snowmobile trails have sections that overlap Forest Service Roads/Wilderness Roads in the winter months. They essentially carry a dual status depending on whether they are plowed or not. If the road is unplowed it is a registered snowmobile trail and when it is plowed it becomes an industry road. Without an objective the registered snowmobile trail can be plowed out at any time with industry not being currently obligated to consider, communicate, or mitigate this snowmobile trail disruption to the club that has the registered snowmobile trail on the same road.

Therefore, the BC Snowmobile Federation would like all existing and new snowmobile recreation sites or trails to have the following standard government registered objectives established:

Proposed Objectives

Section 56 - Recreation Site Level Objective (snowmobile specific) -
All snowmobile trails

- 1. The alpine and coniferous forest features along recreation sites or trails will be retained to preserve the outdoor recreation experience and prevent early season melt on snowmobile trails.*
- 2. Forest planning will include safety considerations for recreational access during the winter months and after harvesting is complete. This will include harvest planning consideration above and below a*

recreation site or trail to ensure that new exposures and avalanche paths are not created. Or that any new avalanche paths are mitigated by terrain modifications such as deflection berms.

- 3. This recreation site or trail is part of the working forest, and as such, activities that are likely to impact access or the recreation experience need to be communicated with the Designated Partner on the trail at least six months in advance.*

Section 56 - Recreation Site Level Objective (snowmobile specific) - “High Value” Snowmobile Trails

Furthermore, in British Columbia we have areas that have a high recreation value for the snowmobile community that represent significant tourism and community benefit. These trails are designated as high value forest recreation sites and trails, by Recreation Sites and Trails BC or identified as an important recreational area by the FLNR Regional Executive Director. The BC Snowmobile Federation would additionally like the following objectives to be established to these sites or trails.

- 1. Opportunities for snowmobiling, viewing and exploring must be provided on this designated snowmobile trail (site) during the snowmobile operating season of December 1 to March 31.*

Draft Resolution #2

Title: Protection for Established Snowmobile Recreational Sites or Trails

Sponsor: District of Sicamous

WHEREAS many local governments and communities rely on the 299 million dollars the snowmobile industry provides to rural communities in British Columbia for economic stability and development.

AND WHEREAS, local governments, communities and snowmobile clubs care about maintaining existing meaningful Recreation Sites and Trails Partnership Agreements with the Province of British Columbia for respectful stewardship of the lands.

AND WHEREAS, BC Snowmobile Federation member Snowmobile Clubs are the largest partner of established Recreation Sites and Trails in BC.

AND WHEREAS, Site level objectives under Section 56 of FRPA have not been established for snowmobile trails in BC resulting in a lack of communication or need to include consideration in Forest Stewardship Plans (FSP).

AND WHEREAS only a Government authorized designated decision maker can set Individual Recreation Objectives for an established recreation trail (site).

THEREFORE BE IT RESOLVED the Union of BC Municipalities asks the BC Government to allocate the necessary resources to establish the following site level objectives on all new and existing established snowmobile sites under Section 56 of FRPA

- 1. The alpine and coniferous forest features along recreation sites or trails will be retained to preserve the outdoor recreation experience and prevent early season melt on snowmobile trails.*
- 2. Forest planning will include safety considerations for recreational access during the winter months and after harvesting is complete. This will include harvest planning consideration above and below a recreation site or trail to ensure that new exposures and avalanche paths are not created. Or that any new avalanche paths are mitigated by terrain modifications such as deflection berms.*
- 3. This recreation site or trail is part of the working forest, and as such, activities that are likely to impact access or the recreation experience need to be communicated with the Designated Partner on the trail (site) at least six months in advance.*

FURTHERMORE BE IT RESOLVED the Union of BC Municipalities asks the BC Government to allocate the necessary resources to establish the following site level objectives on all new and existing snowmobile sites that are established under Section 56 of FRPA and that are considered to be high value forest recreation sites and trails, by Recreation Sites and Trails BC or identified as an important recreational area by the FLNR Regional Executive Director.

Opportunities for snowmobiling, viewing and exploring must be provided on this designated snowmobile trail (site) during the snowmobile operating season of December 1 to March 31.