



R E C R E A T I O N S T E W A R D S H I P P A N E L

Summary of Public Input On The Panel's Sept. 15, 2002 Draft Report

November 29, 2002

Submitted to:

**The Honourable Joyce Murray,
Minister of Water, Land and Air Protection**

Executive Summary

In May 2002, The Honourable Joyce Murray, Minister of Water, Land and Air Protection appointed the Recreation Stewardship Panel (the panel) to make recommendations to improve the management of British Columbia's fish, wildlife and park recreation services and to allow greater public involvement in decision-making. The panel's mandate included direction to undertake targeted consultations with key stakeholders and to release draft recommendations for public discussion and feedback.

The panel established a website, mailing address and toll-free number for ongoing contact with the public and invited written public comment on their Sept. 15, 2002 Draft Report and Recommendations. They also held two sets of meetings with province-wide non-government organizations with an interest in outdoor recreation (in June and August, 2002) and met with First Nations (August). These meetings addressed the panel's draft principles and policy options.

This report focuses on the written submissions and completed comment forms sent to the panel in response to the September 15, 2002 Draft Report. The total number of submissions and comment forms received by the panel by November 15, 2002 was 675. The panel would like to extend its gratitude to those who participated in the process; the effort and thoughtfulness put into the submissions was most impressive.

Comments contained in the submissions were sorted into main topics corresponding to the panel's principles and recommendations in the Draft Report. The comments were further sorted into sub-topics and summarised to capture the various viewpoints expressed on each topic.

The overall tenor of the submissions was one of passion for protecting the ecological integrity of parks and the highly valued outdoor recreation experience in British Columbia. In response to the draft report, there was a general reluctance to dramatically change how fish, wildlife and park recreation is managed now, or how it was managed in the past.

By far, the topic that received the most frequent response was the funding model, and in particular the proposed introduction of user fees for non-consumptive use of parks and Crown land. Other topics that received a high response rate were the principles and recommendations related to First Nations' rights and involvement in management and delivery of fish, wildlife and park recreation management; potential for increased commercial activity and partnerships with the private sector; dedicating revenue and retaining it in trust; the panel public process; maintaining the current ministerial authority; continuing the forest recreation programs, re-instating education and interpretive programs; and maintaining the existing legislation.

Approximately half of all the components in the draft report were generally supported in the submissions, one quarter of the components were generally opposed and one quarter fell somewhere in between with mixed or neutral responses.

Common elements that were generally supported in the submissions included the following:

1. Recognition of Aboriginal rights and involvement of First Nations in management, funding and delivery of fish and wildlife and park recreation.
2. Conservation and protection as the foundation for recreation.
3. Re-instatement of the education and interpretation programs for fish, wildlife and parks.
4. Clear accountability to the public through the current system of ministerial authority; existing legislative requirements and constraints, particularly the Park Act; and improved public involvement mechanisms, including provincial and regional advisory bodies.
5. Continuation of forest recreation sites, trails and roads.
6. Dedication of any new user fees back to fish, wildlife and parks, with the funds held in trust.

Common elements that were generally opposed included the following:

1. The introduction of new fees and a recreation pass for non-consumptive (e.g. hiking, swimming, wildlife viewing) use of parks and Crown land.
2. A funding model with base level conservation and protection paid for by government and enhanced levels provided through voluntary contributions; and base level recreation paid for by government and contributions with incremental costs paid by user fees, contributions and partners.
3. Increased commercial activity in parks, intensive revenue-focused locations in or adjacent to parks and expanded partnerships with the private sector.
4. Expansion of the Habitat Conservation Trust Fund (preferred that it remain unchanged and used as a model for a new fund to support parks and outdoor recreation).

Three other common themes emerged regarding the draft report and the panel process: lack of clarity in the draft report, lack of economic data and analysis in the draft report, and lack of meaningful public consultation throughout the panel process.

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Introduction

Public Consultation Plan

In May 2002, the Honourable Joyce Murray, Minister of Water, Land and Air Protection appointed the Recreation Stewardship Panel to make recommendations to improve the management of British Columbia's fish, wildlife and parks recreation services and to allow greater public involvement in decision-making. The panel's mandate is attached as Appendix A.

The panel's mandate included direction to undertake targeted consultations with key stakeholders and to release draft recommendations for public discussion and feedback. A public consultation plan was developed to describe how the panel would involve stakeholders and the public in the process (attached as Appendix B).

The key elements of the public consultation plan were:

June 6	panel website with access to panel information, reports, updates and the ability to sign up on a distribution list or complete an on-line comment form
June 25/26	Preliminary discussions with province-wide Non-government groups with an interest in fish, wildlife and park- recreation (agenda focused on panel's mandate, and principles to guide development of options)
August 14	Release of discussion paper on principles and options
August 22	First Nations Meeting to discuss principles and options
August 22/23	Options workshop with First Nations and province-wide non-government groups (agenda focused on principles and options developed by panel)
Sept. 15	Release of draft report and invitation for public comment (communicated by press release and direct mail/e-mail to distribution list)
October 15	Deadline for written submissions and completed comment forms
Nov. 29	Public release of report on public input to the panel Submission of panel's final report to the Minister

The panel also accepted written submissions throughout the process. The panel released a report summarising the June 25/26 discussions with province-wide groups

and a set of verbatim transcripts of the August 22/23 options workshop with First Nations and province-wide groups. These documents are available from the Ministry of Water, Land and Air Protection (see contact information on the title page).

This report focuses on the comments submitted to the panel in response to the September 15, 2002 Draft Report.

Release of Draft Report

The panel released its draft report on Sept. 15, 2002 by issuing a news release, posting the draft report on the panel website, and by mailing (80) and e-mailing (383) the draft directly to those on the distribution list. As well, province-wide groups involved in the panel discussions were asked to distribute the material to their members through electronic list-serves. By the end of the process, there were 1006 groups and individuals on the distribution list (278 with street addresses and 728 with e-mail addresses).

There was extensive media interest in the news release, resulting in radio interviews, radio call-in shows and print media coverage in over 15 articles province-wide. This interest led to approximately 90 additional requests for copies of the draft report, and many more were downloaded directly from the panel website.

Those who received the draft report also received directions on how to provide their comments to the panel. The options were:

Comment Forms

- Fill out a comment form on the panel website
- Fill out the attached comment form (or call to have one sent) and send it back by mail or fax

Written Submissions

Prepare a written submission and send it:

- As an e-mail note
- As an electronic file attached to an e-mail (MS Word or pdf files)
- By mail or fax

Analysis and Summary of Public Input

The two main forms of public input were comment forms (see Appendix C) and written submissions addressing the draft recommendations; there were also a small number of verbal comments taken by phone and transcribed for the record. The total number of submissions and comment forms received by the panel by November 15, 2002 was 675. Late submissions (38 received after October 15, 2002) were reviewed after the preliminary analysis was complete and incorporated into the report where they expressed a viewpoint that was not yet captured. Submissions received before the draft report was released (47) were also included as they addressed issues relevant to the draft report.

Three of the submissions contained summaries or lists of comments provided by participants in meetings, workshops or surveys conducted by non-government groups discussing the panel's draft report; these involved more than 340 people (not reflected in the total of 675). While individuals sent most of the submissions and forms, there were 152 submissions from groups and organizations, many of which indicated that their submission had the support of its members. The breakdown of the types of input is shown below.

Submissions to Panel (received by November 15, 2002)

Written Submissions	
Letters (mailed)	67
Letters (faxed)	37
E-mails with attachments	114
E-mails without attachments	223
Signed form letters	76
Summaries of public input	3
Sub-Total Written Submissions	519
Comment Forms	143
Verbal Submissions	12
Total Input to Panel	675

A database was created of all electronic files received by the panel. All submissions received by fax or mail were digitally scanned using an "Optical Character Recognition" mode and added to the electronic database. Handwritten comment forms were transcribed into the on-line form and added to the database.

Comments contained in the submissions were sorted into main topics corresponding to the panel's principles and recommendations in the Draft Report. Comments on the panel's public process were grouped into an additional topic as comments on this topic were specifically requested in the comment form and because it was raised in many submissions. Comments that went beyond the panel's mandate and draft report were not included in this summary. The sorting was carried out using a computer-assisted content analysis technique designed specifically for working with large volumes of qualitative data.

Once the information was sorted into the main topics, it was further sorted into sub-topics corresponding to common themes emerging in relation to the main topics. Once the comments were sorted, they were summarised to capture the various viewpoints expressed on each topic. Where appropriate, a subjective indication of the frequency of comments is provided, however, it is important to remember that this is qualitative information.

This report summarised the comments of self-selected groups and individuals who chose to participate in the panel's public process. This is not based on a statistically valid random sample, so the results cannot be considered representative of the broad public. It is still valuable in that it provides a snapshot of what over 1000 British Columbians with an interest in outdoor recreation thought about the panel's draft report.

The summary of comments below follows the structure of the panel's draft report. Excerpts from the draft report are included where needed to provide a point of reference for the comments. Please see the Draft Report for a complete set of the draft principles and recommendations. The summary begins with the principles and then moves through each of the 31 recommendations. Comments on public process are provided at the end.

Principles

Principle 1

The province's fundamental obligation to conserve and protect wildlife, fish and their habitats, and the parks of British Columbia will guide the development and management of recreation opportunities.

Respondents indicated a strong endorsement of Principle #1. Stakeholders tended to see this and Principle #2 (use of general tax revenue to support conservation and protection) as the sacrosanct foundation for all policy concerning management of parks, fish and wildlife in the province. However, as will be described later in this section, people also expressed concern that in the balancing act between principles of conservation/protection and principles of revenue generation/tourism promotion, revenue generation will relegate conservation to the background.

Issues of Implementation

With regards to implementing Principle #1, it was suggested that there should be a recommendation that sets out how the principle will be addressed by the various ministries and levels of government with responsibilities affected by adopting the principle. A similar view suggested that a Conservation Strategy be developed to bring together all the conservation policies presently contained in the Park Act, the Wildlife Act, the Ecological Reserves Act and fisheries legislation, among others. Several respondents called for legislative "teeth" for consensus-based land use plans, which should be taken as guidance, not as mere advice, for decision makers. Respondents also called for proactive measures to preserve BC's world-renowned wildlife and biodiversity.

It was also noted that the maintenance of biodiversity is fundamental to conservation of fish, wildlife and protected areas and to achieve this will require a substantial effort supported by funding and staff. It was also emphasized that if there is incomplete information on the environmental risks of recreational activities on fish, wildlife or parks,

those activities should be rejected until sufficient information is available to make an informed decision. Finally, the panel was applauded for recognizing the importance of environmental and natural history education and the necessity of park interpretation programs. Basic nature education programs were seen as a very cost effective way to inform and motivate the public to be stewards of conservation.

Adjustments to Legislation

Some submissions reflected on legislative implications relative to Principle #1. One group said they would prefer that the panel recommend a review of all legislation affecting parks, fish and wildlife, such as the Forest Act and the Mineral Act, to ensure compliance with this principle. This group also had some concern about the implications of dedicating revenues collected from recreation fees solely to the provision of recreation opportunities. The concern was that some of these revenues would not be directed toward conservation and that maximizing cash flow at the expense of conservation could motivate management decisions. The panel was urged to find a legislative solution to avoid such a situation and to ensure that an appropriate portion of revenues is directed to conservation and education.

Funding Issues

Numerous submissions dealt with comments and concerns about core funding for conservation and protection. Stakeholders wanted ironclad assurance that government would maintain its funding obligations in this area, deemed as fundamental to British Columbians as are hospitals and education. One group said that a major funding increase would be required to implement Principles 1 through 6, saying that the Parks branch lacks the capacity and resources to draw up management plans, establish carrying capacities, update data, and resolve conflicts. A budget of \$200 million was suggested.

Ability to Uphold Principle

Some respondents expressed scepticism about the government's ability and willingness to uphold the panel's Principle #1 while at the same time embracing principles concerning revenue generation from user fees and increased tourism. They saw the two goals as being potentially at odds. For example, one group questioned how conservation goals could withstand a potential doubling in tourist visits. Respondents made a number of suggestions on how to uphold the principle of conservation in the face of recreation/tourism demands:

- Identify a mechanism by which any incidences of non-compliance with conservation standards are effectively pinpointed and remedied, especially within large wilderness parks.
- Base resource management decisions on accurate data for stocks and harvest. Set a resource baseline as a minimum acceptable standard.
- Have one Ministry set standards and have sole signing authority for sustainability, conservation and biodiversity.
- Issue no tenures or licenses before all inventories, impacts and uses are known and addressed. This would require legislated protection for recreational activities or conservation requirements on all public lands.

- Maintain responsibility for conservation enforcement and protection within the Ministry of Water, Land and Air Protection and the Ministry of Forests.

Clarification

Several respondents made suggestions to strengthen and clarify Principle #1:

- Add the word “enhance” to the principle so it reads: “... conserve, enhance and protect...” and so on.
- Make reference in the principle to existing plans (such as Park Management Plans) as a process framework for determining appropriate use.
- Include the term “ecological integrity” in the wording and define “conservation”.
- Include a statement about the fundamental importance of biodiversity.
- Ensure all wording emphasizes that conservation principles guide recreation policies and practises.
- Consequences should endorse a “science-based approach”
- Add the following sentences: “The province’s fundamental obligation to conserve and protect wildlife, fish and their habitats, and the parks of British Columbia will guide the development and management of recreation opportunities. Where habitat conservation is at risk, recreation opportunities are to be curtailed.”

Principle 2

Conservation and protection are the responsibility of government and will be supported by general tax revenue.

Respondents indicated unanimous support for this principle. They spoke of parks as a trust held by government for this and future generations, and of conservation as the prime driver for all recreation management decisions. However, as the following discussion will reveal many people had concerns about government’s commitment to conservation, about how “adequate” funding levels will be defined and about how funding assurance will be provided even during periods of reduced provincial revenue.

Determination of Adequate and Sustained Funding for Conservation

As a guideline for establishing core-funding levels for conservation, one group offered the following definition:

- (Conservation is) management to produce or maintain populations of species at optimal sustainable levels based on the biological capacity of the habitat, including preservation, protection, augmentation and controlled utilization.

Concern was expressed, however, about the process for setting conservation standards. Respondents wanted to know who would set the standards, when, and how. They also desired assurance of stable funding to maintain agreed-upon standards, and assurance that funding for conservation will be tied to general tax revenues and not to revenues generated by user fees. On the latter point it should be noted that one group did not want to preclude user fees as a source of funding for conservation efforts. This speaks to respondents’ overall desire for clarity on what constitutes government’s minimum conservation responsibility.

Principle 3

First Nations have aboriginal rights related to wildlife and fish, as well as interests in parks. The province will work co-operatively with First Nations in developing, enhancing and managing recreation opportunities.

Submissions speaking to this principle revealed a consensus of support and agreement from First Nations and non-First Nations stakeholders alike. However, stakeholders expressed considerable cynicism about the Province's commitment to working with First Nations given their perception of the current government's "adversarial" approach to treaty negotiations. Stakeholders wanted to know how the government would enact this principle. One group said that parks and ecological reserves are an overall public trust and this tenet underlies all existing agreements with First Nations for cooperative park management. Submissions from First Nations raised the following additional points:

- First Nations would require adequate, incremental resources in order to participate in "developing, enhancing and managing recreation opportunities." Concern was expressed that the overall consultation process has provided neither adequate time nor any funding for First Nations to effectively participate.
- Most BC Parks were created without First Nations consent and there are unresolved grievances in this regard. "Bundling" of parks, for example has the potential to compromise the "geographical integrity" of First Nations territory.
- Aboriginal rights and title exist independent of the Treaty process, so this principle must be acted upon irrespective of Treaty negotiations.
- Commercial use of the backcountry must respect First Nations Treaty rights. The full range of Aboriginal rights must be reflected in the panel's final recommendations.
- The Delgamuukw and other legal decisions have made consultations with First Nations a legal obligation for government and third parties.

Principle 4

Learning about the natural world and our cultural heritage is integral to conservation and outdoor recreation, and its cost will be shared by the province and recreation users.

All respondents commenting about this principle agreed wholeheartedly that education conservation and recreation are inextricably connected. They spoke passionately about education as one of the most important tools for helping recreationists to become conservationists. For example, education on how a park ecosystem works motivates users, giving them not only greater appreciation for the environment but also an understanding of and appreciation for Park rules, such as keeping dogs on a leash so they don't disturb ground-nesting birds, and avoiding picking berries which are needed as food for birds and wildlife. One former park naturalist asserted that he/she had never run an interpretive program that did not contribute toward conservation and protection of the park.

Due to the clear link drawn between education and conservation, most respondents disagreed with the latter portion of Principle #4, the sharing of education costs between

government and recreation users. Stakeholders argued that since education meets the test of conservation embodied in Principle #1, the government should wholly fund education and interpretation programs. Many called for the reinstatement of interpretation and education programs for parks, fish and wildlife that were cut in 2002. Others said there would be considerable difficulty differentiating between conservation education and recreation education; calling on the panel to explain what circumstances would justify the latter. They also asked that the panel define a base level for government funding of interpretation in parks and the “add-ons” they would foresee on a user-pay basis. Finally, one group recommended that the province increase its role in public education by making conservation, angling and fish stewardship part of the core curriculum for the K – 7 elementary school programs.

One respondent suggested that interpretive programs be wholly funded through sponsorship or partnership agreements, citing such agreements as an attractive community relations opportunity for resource-based primary industries. A few respondents indicated agreement with a shared government/user-pay approach to interpretive programs.

Principle 5

Recreation management will include explicit and ongoing mechanisms for public consultation.

The principle of public consultation in recreation management resonated very strongly with respondents. All agreed with the need for bona fide public input into management decisions and there were a number of suggestions about what this should look like. One group said that if this principle were to have any validity, the panel’s final recommendations should link to and not contradict the conclusions and recommendations of the Park Legacy Project (PLP), since that project undertook extensive, province-wide consultations. They said their club, along with many private citizens, invested much time and effort into the PLP. Some respondents were critical of the panel’s consultation process, calling it inadequate to ensure good local debate. Along with the PLP, another process cited as a good model was the Master Plan process for Strathcona Park.

Potential for conflict was identified between local needs/interests and broader needs such as biodiversity. One group said the panel report should make specific reference to land use-planning processes as an existing consultation tool. Whatever the tool, respondents appeared to agree that consultations must be valid and have direct influence on decisions. Some called for supporting legislation to ensure that processes are open, implemented in a reasonable period of time, and have decision-making authority. Overall, respondents endorsed the principle of consultation but remained cynical that it will be genuinely implemented.

Principle 6

Provincial agencies with outdoor recreation mandates will formally coordinate planning and management to ensure consistency.

There was general support for this principle. Respondents saw coordination as key to greater efficiency and improved communication with the public. However, specific gaps, issues, and roles would need to be spelled out before enacting legislative change. Some submissions specifically called for a province-wide outdoor recreation strategy, with one group recommending that the panel include in its final report a definition of the nature, issues, and desired outcomes of such a strategy.

One group said that mechanisms for monitoring and evaluating the effectiveness of coordination should be embedded within the principle or as part of a recommendation. Some respondents commented specifically on Forest Recreation Sites and their service roads. Some said government should resume maintenance of these facilities; another said a simple shift in job description for Ministry of Forests staff could make facility maintenance a cost-effective proposition with little incremental cost to taxpayers – far less costly than issuing private contracts.

Doubling of Tourism Revenues

Several respondents indicated strong concerns about the government's goal of doubling tourism revenues. They were concerned that this goal jeopardizes conservation principles. A group representing anglers said many high-quality fishing waters are already overcrowded and suggested focusing on high-end users, expansion of lake hatchery programs, and more catch-and-release or limited-kill fisheries as ways to increase tourism revenues. Another group questioned the foundation for the target of a doubling of tourism revenues, wondering if the goal was an increase to the industry or an increase to government revenues, which would generate quite different figures. This group asked for an expansion of the "consequences" section to include a thoughtful analysis of the implication of increased tourism to conservation goals.

Principle 7

The province will pursue partnerships with First Nations, local governments, the private sector, non-profit sector and individuals to increase capacity to manage and provide land and recreation services.

Input concerning this principle was mixed, with some submissions strongly supporting aspects of partnerships and others seeing more potential for problems than for benefits. Several respondents said that with proper organization and management, partnerships between government, the non-profit sector, communities and volunteers could yield wonderful results. They had a variety of views on what is required to facilitate success, including:

- Resources from government to coordinate volunteers. Without such coordination efforts can be misdirected and volunteers under utilized.
- Multiple mechanisms for recognizing the contributions of volunteers.

- Consultations with local communities to understand how they treasure the parks in their area.
- Acknowledgement of the local knowledge base and dedication of community-based organizations.
- Government support for, development and empowerment of community-based stewardship groups to work on habitat and small-scale hatchery programs.

Some support for this principle came with caveats. One group said that partnerships must have an open and transparent decision-making process to help assure that any legitimate concerns of the public or other Ministries are addressed. Further, they said that in the case of the private sector, partnerships must be in the form of a contractual relationship so that the legal obligations of each party are understood and enforceable.

Several respondents suggested that the risks of partnerships outweighed potential benefits. The main concern was that the government (and by extension, the public) could lose control over parkland. Linked to the issue of control was concern about accountability and reliability of service. Several people questioned how balance would be achieved between groups (First Nations and the private sector were specifically mentioned). Once again, people cited concerns about the potential for conservation goals to be compromised by partnerships.

Some respondents said they believe the principle of partnerships is not realistic because there will be too few willing partners. One group, whose members have partnered with government for some time, said that changes are needed to make partnerships more mutually beneficial. Their experience to date is that advantages have accrued to the government while the private sector partner has accrued the disadvantages and liabilities.

Principle 8

Public land designated for fish, wildlife or park recreation will remain publicly owned, although land exchanges or transfers will be considered where they enhance conservation and public recreation values.

Respondents adamantly agreed that public land designated for fish, wildlife or park recreation remain publicly owned (“cannot understate the importance”; “strongly agree”; “completely agree”). One respondent noted that public ownership was one of the dominant themes of the Parks Legacy Project.

Respondents were equally adamant in their concerns about the potential for land exchanges or transfers. Some said that parks should not be exchanged for recreation values. Some said they would support an exchange or transfer if an area of high conservation value was added to the park system. Another suggested that an exchange might be beneficial if the land exchanged were on Crown land, such as a transfer of timber licenses, since such an exchange would have the potential for recreational opportunities.

However, there was an overriding concern that exchanges/transfers would open the door to dismantling the park system in favour of commercial interests. A recreational fishing group said they would not support private pay-for-fish enterprises on public lands and rivers. A parks and wilderness group said they would support the transfer of parks or protected areas to national or regional governments if it mean more resources being brought to bear on conservation and if conservation values were preserved via formal agreements.

Past Experience

One group described past, unsatisfactory experiences with land exchanges in the Southern Okanagan and the Kootenays. In the former example they said access was cut off to public lands beyond the purchased land and in the latter, purchased lands have no management plan and have become overrun with weeds. This group also had problems with transferring lands to the federal government, citing concerns about management of the National Park system. The two key concerns related to maintenance of public access to lands and waters and to appropriate land/resource management. Further, the group stated that if public lands are “alienated” through sale or lease, 50 percent of the purchase price should be dedicated to the Crown Land Fund to enable replacement of loss through private purchase. They said the existing directive is not being upheld and the government should reimburse the fund including the payment of retroactive monies.

Legislation and Implementation

Several respondents commented on legislative impacts/requirements concerning this principle. One asked whether land exchanges or transfers could be approved under an order-in-council as an alternative to changing to the Park Act. Others stated outright opposition to any changes to the Act. One group said that transferring land from parks would contravene Section 5(6) of the Park Act unless the legislature changed the Act. Still another believed that a mechanism for land exchanges already exists via the “Park Boundary Adjustment” approved policy.

An overarching concern about conservation was raised here as well, with several respondents querying how recreation and conservation values can be reconciled. One asked what measures and criteria would be developed to ensure protection of conservation values in land transfers, including monitoring post-transfer. Overall, no net loss of conservation and recreation values was deemed to be crucial.

Trust for Public Lands

A few respondents questioned or expressed concerns about the “Trust for Public Lands” described in the consequences section of this principle. They said since people know nothing about this initiative they cannot support the idea. More information is needed concerning the structure of such a trust.

Principle 9

Basic public infrastructure for recreation services and access, where provided, is a provincial responsibility and will be paid from general tax revenue. Enhanced infrastructure may be provided by the province and others. Non-government ownership of such enhanced infrastructure on publicly owned land will not confer land ownership in law or in practice.

Need for Definitions

The most common input on this Principle was the need for definitions of “basic” and “enhanced” infrastructure, and of capital improvements versus annual infrastructure repairs. Without this clarity stakeholders had difficulty knowing what they might or might not be supporting. Some suggested that basic infrastructure includes Forest Recreation Sites, which should be funded through fees collected for cutting permits. Another submitter offered the view that the Ministry of Forests should not return to the business of recreation management; however, government should fund the sites and contract the maintenance to an outdoor recreation management organization. Other definitions of basic services included maintenance of public road access to recreation areas (although the need for fees for restoration and maintenance was acknowledged) and access to existing hiking trails. An example given of an enhanced service was backcountry campgrounds that are managed daily by rangers.

Application of Fees

Respondents had a variety of ideas on how user fees should be collected and applied toward enhanced infrastructure. Some said in areas of low-end infrastructure and essentially local use, user fees should only cover costs and not seek to make a profit. Others said it was acceptable to collect user fees to cover operation of the parks system as a whole but not for maintaining the structural components of parks such as roads and playgrounds. It was also stated that fees from heavily used, profitable parks in populated parts of BC should be used to offset the cost of providing parks in more remote regions. If the cost is higher than users’ willingness to pay, the fees and the funding mechanism as a whole should be considered first, rather than withdrawing the service

One group said that when government turns park facilities over to private sector operators, the public loses access, such as in the case of Cypress Mountain Ski Resort, where people cannot access the backcountry in the Park without purchasing a ski ticket. Other respondents said it was “totally unacceptable” to consider privately owned infrastructure in backcountry parks - it would violate the public will expressed in the Parks Legacy Project Final Report. However, some tolerance was expressed for private ownership of infrastructure in roadside parks that primarily serve the motoring public.

Principle 10

The public will continue to have a right of access to Crown land used for outdoor recreation.

Respondents strongly endorsed this principle, seeing public access as a “fundamental right” and a “given”. Reference was made to the December 1990 public discussion paper “Commercial Backcountry Recreation on Crown land in BC” in which almost all respondents opposed commercial backcountry recreation rights that would infringe on public use.

The support of some respondents for this principle came with caveats. One parks and wilderness group said there is a major difference between land used for recreation and recreational use of land. They said that since recreation takes place on all Crown lands and waters, they oppose the notion of zoning lands specifically for recreation. There should be no exceptions to the basic public right of access to Crown land. Hence, they said the word “used” should be dropped from the principle.

Conservation concerns were raised again, with some respondents saying that limits need to be placed on the public’s right of access via motorized vehicles, whether that be on land, water, or in the air. They said that the term “right of access” requires clarification concerning the intensity, conditions, and type of access. Local area planning was suggested as a means for determining the scope and nature of access. Backcountry access was seen as a privilege, with inherent responsibilities. Public consultation was deemed to be essential in determining any exceptions to right of access.

Several respondents specifically mentioned Forest Recreation Sites in relation to this principle. Some urged the retention and maintenance of these sites by the government while another cautioned that closures of sites and road deactivation will compel some people to “retake their right of access” - the implication being through intrusive and ecologically damaging means.

Finally, some respondents stated emphatically that revenue generation might be linked to things that people can choose or not choose to use in parks, but not to basic access.

Principle 11

The province may contract with, or license private recreation service providers where consistent with these principles and there are no risks of monopoly control or to conservation values.

A majority of respondents raised concerns regarding contracting of recreation services to private providers, with many opposing the concept outright. A group representing private contractors was supportive but argued that the current Request for Qualifications for campground operators was requiring bids on large groupings of campgrounds – too large for some current operators. They said the process would create local monopolies

and exclude incumbents. Another said the private sector should have a greater role but that an open decision-making process would be essential for determining appropriate uses, locations, and conditions. It was also suggested that the panel include a specific recommendation in its final report that the government develop policy guidelines on rates of return to private operators.

Some respondents said it was fine to continue with contracting the management of roadside park campgrounds to private operators, but this should be the limit of privatization. Concerns included:

- Potential for conservation values to be compromised (e.g. would responsibility for monitoring private suppliers to ensure such values are maintained; concern that within the current climate of government budget cuts there will be inadequate staff to assess risks and conduct monitoring; concern that “entrepreneurs” may lack sufficient knowledge to understand sensitive ecological balances)
- A need for rigorous risk assessments but a lack of government resources to conduct these assessments. It was suggested that proponents pay a proposal review fee to help offset the costs. Also suggested was that the panel identify another consequence of this principle -- that the Ministry of Water, Lands and Air Protection or Ministry of Sustainable Resources would need to be assigned to assessment and that extra staff, including qualified biologists, would need to be hired.
- Loss of control i.e. what would happen if the conservation ethic of the supplier slipped over time? Contracts would need to ensure that non-compliance meant contract termination.

Principle 12

Recreational user fees will cover incremental costs, including costs of operating and managing the service, annual infrastructure repair, and crowding. Exceptions may be made for access, public health and safety purposes, or to maintain services in locations having provincially significant recreation values.

The topic of user fees generated a host of views, concerns, and questions. Foremost, respondents called for clear definitions of what constitutes “basic” costs for conservation and recreation vs. “incremental” costs. For example, does “incremental” mean building a new trail or does it mean maintenance of an existing trail? They said definitions are essential for informed discussion, and implied that such discussion would be lively, given the multiplicity of viewpoints. Overall, respondents desired genuine opportunities for input to the definitions, to the development of policy on user fees, and to how fees are administered. They noted that the topic has generated considerable debate since the outset of the panel’s process and a resolution is no closer.

Several respondents disputed the assumption that the park system “does not pay for itself”, asserting that parks in fact generate revenues for the province. They requested data to justify user fees and warned that administration of fees would be costly in and of itself. An example was referenced from a 1998 report from the United States Parks Service, where it was reported that administration costs account for 35% of the fees

collected for parks service, and 71% in the case of Fish and Wildlife Services, 71%. Reference was also made to a September 2001 report from PriceWaterhouseCoopers, which concluded, “the current park system covers its own direct costs many times over”.

Conditions for User Fees

Respondents had a range of viewpoints on what might constitute acceptable user fees for incremental costs, and indeed on what constitutes “incremental costs”. Many felt strongly that in view of Principle #10, it would be inconsistent and unacceptable to charge fees for non-consumptive use/access to public lands. This included considerable opposition to fees for use of hiking trails and for non-guided use of the backcountry. A system of determining fees based on the degree of impact was suggested, such as charging more for horses and mechanized use to mitigate impacts.

Increased fees were also opposed by angling groups unless anglers were given a “real and meaningful say in setting management policy.” They saw Management Boards as the key mechanism for connecting stakeholder interests with program outcomes. It was also pointed out that figures in the panel’s draft report show revenues of \$18.5 million in 2002/2003 for Fish and Wildlife and expenditures of \$16.4 million, suggesting that fish and wildlife consumers are paying more for the services than they receive. Some tolerance was expressed for increased fees if the money was specifically and solely directed to protecting and enhancing the fishery resource. Similarly, some respondents indicated tolerance for the idea of user fees for parks as long as the revenues are retained in the parks system.

Respondents also called for controls and accountability concerning application of user fees. There was concern that fees collected for a specific purpose (e.g. for parks or for the fishery resource) could end up in general revenue, an unacceptable premise for most. One respondent pointed out that if service providers from outside Canada were allowed to become contractors, NAFTA and/or WTO rules would apply.

Variance in Fees

Some respondents said it would be unacceptable for residents in areas with small populations to pay higher user fees due to higher delivery costs. In general, there appeared to be support for using revenues from high use areas to offset operating/upgrading costs in more remote areas.

Barriers to Access

Several respondents saw user fees as a barrier to British Columbians’ access to outdoor recreation opportunities, especially to those on low incomes but also to the public at large and to tourists, who may be put off by fees.

Exceptions

A number of respondents called for a clear and open process to determine any exceptions to Principle #11. Some said that the panel should immediately address a mechanism for developing policy, guidelines and process concerning exceptions.

Crowding

Some respondents disputed the use of user fees to cover the costs of “crowding.” They said crowding of parks should not be allowed, since it indicates that the park’s carrying capacity has been exceeded. In cases of crowding, use should be restricted rather than fees charged to repair damage sustained by crowding. There was also concern that large-scale promotion of parks could lead to crowding and compromise the conservation goal articulated in Principle #1.

Closures

Several respondents expressed concern about service withdrawal if users were unwilling to pay to be unsettling. It was suggested that mechanisms for consulting with the public be built in prior to unilateral closure so that alternatives to withdrawal might be identified.

Principle 13

Non-resident recreational users will pay fees based on competitive market value for recreation opportunities where this value is higher than incremental costs.

While some support was expressed for higher fees for non-resident recreational users, respondents were generally unenthusiastic about the idea. Support came from some representatives of the angling community, who felt that non-residents are paying far too little for license fees to fish BC’s world-class fisheries, especially compared to the fees charged elsewhere. Several respondents had trouble with fish, wildlife and park recreation being grouped under the general term “recreation” when each component is as a very different product. For example, administration of a market-value fee might work in an auction for a hunting opportunity, but a number of people had difficulty with differential fees in the case of park and campground facilities. They thought the latter could deter non-residents from travelling in BC, leave them with a negative impression of the province, or increase expectations of standards and quality that may not be achievable.

Difficulty of administration and enforcement was seen by many as reason to dispense with this principle. People had difficulty visualizing how differential rates could be enforced, i.e. would people have to produce passports at campgrounds? There appeared to be a common view that this principle would, in fact, be unenforceable. Again, the United States Park Service experience was referenced. One respondent suggested that if the government is concerned about recovering a fair share of costs from non-residents, a recreation tax on the tourism industry should be considered.

Finally, if this principle carries over to the final report, the panel was urged to make fees based on market values for non-residents an explicit recommendation and to recommend that the impacts of such fees be monitored and evaluated.

Principle 14

Commercial service providers will pay market prices for the right to use and benefit from wildlife, fish and parks.

Principle #14 drew a mixed reaction from respondents. Some, notably anglers, agreed that commercial providers should pay market prices for the right to use BC's fish resources. The fees charged for fishery guides were perceived to be far too low and illegal guiding was thought to be a major problem. On the other hand, a representative of the fishing resort industry articulated "significant market resistance" to fee increases that resort operators would have to pass on to their guests. They submitted that the consequences of such increases are not known, and they fear that the cumulative effect of rising costs combined with a competitive marketplace would turn guests away. Another respondent said that "the notion of turning fish and wildlife, ... essential components of the natural ecosystems of BC, into commodities is abhorrent to most thinking people."

Definitions were also problematic for respondents, who requested that the term "commercial service providers" be clearly spelled out. One suggested that the definition should include tour operators and commercial recreation providers, but exclude campground maintenance, day use maintenance and interpretive programming. Concerns were also raised here about NAFTA if American service providers were involved. For at least one respondent, this principle flagged the need for development and implementation of Park Management and Backcountry Recreation plans.

The mechanism for determining market price was also a contentious issue. The panel was asked to address who would make this determination, how they would make it, and what mechanisms would be established for review. Whatever the process, one respondent said there should be no subsidies to commercial entities, and market prices should apply to tourism-directed commercial activities as well as to industrial users of water and lands within the parks system.

Other respondents agreed on the difficulty of determining fair market price. One suggested the "Travel Cost Method" or the "Contingent Valuation Method" as applicable to resource valuation situations, but noted that both have been found to be time consuming and expensive. Further, market value would have to be periodically reviewed and updated – an administrative burden for both government and tourism operators. Monitoring of compliance with the terms of licenses was also raised, especially with regard to upholding conservation values.

Principle 15

Recreation fee revenue will be dedicated to the provision of recreation opportunities and directly connected to the services provided by the Province.

Principle #15 garnered widespread, though not unanimous support, and must be understood within the context of somewhat grudging acceptance of the notion of user fees in the first place. Stakeholders said they and the public could accept new fees or fee increases only if it could be demonstrated that revenues were being directed to the area from which they were derived, i.e. parks revenues to parks, angling revenues to fisheries programs, hunting revenues to wildlife management. However, many respondents wanted it understood that a portion of such revenues should be dedicated to conservation, not just to provision of recreation services. Some said there should be a provision for special conservation fees to be directed into a Trust Fund of the user's choice. This would help make Fund managers more accountable to their stakeholders.

One angling group used the Habitat Conservation Trust Fund as an example to make the case that surcharges for conservation are not a form of fee because they are directed to a specific Fund. This group did not understand the panel's suggestion that the "loss of revenues going to the CRF (Consolidated Revenue Fund) would result in a corresponding reduction in the Ministry Vote." They questioned why a reduction would be forecast if there was agreement that a base case for the Ministry had not yet been identified. They said the HCTF must not change; neither would it be acceptable to reduce the amount of money going into the HCTF since it is a funding mechanism for the fishery resource, not for the Ministry.

There was also considerable concern expressed about one of the consequences the panel identified with Principle #15: "This principle may result in management decisions being motivated to maximize cash flow at the expense of conservation." One stakeholder asked, "If this principle is in conflict with Principle #1 why include it?" The overall consensus was that if adequate safeguards cannot be put in place to assure conservation, this principle should be eliminated.

Respondents were also concerned about government accountability regarding how revenues from fees will be directed. They asked for the Minister to issue regular "State of the Parks" reports to the legislature, as the Park Legacy Project recommended. It was also noted that dedication of fees for specific purposes would require Treasure Board approval. Clarification was requested concerning what is meant by "allocation decisions" referenced in the panel's draft report. Examples of "alternative sources of revenue" Were also requested.

Principle 16

Setting of fees will be delegated to the Ministry to ensure flexibility and responsiveness to changing circumstances while protecting the public interest.

Principle #16 elicited fewer responses than most of the other principles, but again reflected a range of views. Supporters saw delegation of authority to a Minister as a useful step – "... a long overdue reform". However, there was still an expectation that the public be involved in determining what should be subject to fees and how much should be charged. Other respondents viewed delegation of authority to the Minister to set fees as "a scary concept."

Principle 17

Fee discounts based on inability to pay may be considered through specific policy, not by compromising the above principles.

The idea of fee discounts elicited little outright support. Overall, respondents said that rather than look at discounts, the government should emphasize keeping fees affordable to all British Columbians. One respondent suggested an annual permit system of \$25 per individual and \$50 per family to access and use all basic facilities on Crown land, including BC Parks backcountry camping and Forest Service campsites, as well as resident discounts for use of enhanced park facilities. Some rejected the notion of discounts outright:

- "The inability to pay for recreation does not lessen the impact that individual has on the resource. If policy changes are made to accommodate them, those changes must also identify how a makeup of the shortfall will be reimbursed."
- "[Our organization] does not support fee discounts ... encourages cheats and deprives the service of much needed revenue to maintain fish, wildlife and recreation opportunities... It's a question of ... people prioritizing how they utilize their discretionary spending."

On the other hand, some respondents found it "mean-spirited" that the panel proposed no fee discounts based solely on age or disability. It was suggested that the savings in health-care costs for seniors and those with disabilities, realized through the health benefits of exercising and enjoying the outdoors, outweigh the cost savings by eliminating the discounts and free camping passes. Some suggested that seniors have been paying taxes their whole working lives and deserve to enjoy outdoor recreation at a discounted price.

Discounts were also seen as an administrative and cost burden. It was noted that neither the cost of screening applicants for discounts nor the on-site processing costs have been considered.

Broad Comments Concerning Principles

Respondents included a number of comments of a general nature concerning the draft Principles.

Definitions

The need for working definitions was a recurrent theme. Respondents were looking for the following terms to be clearly defined:

- Conservation
- Ecological integrity (some respondents stated firmly that this term should be included in the report, especially in Principle #1)
- Recreation vs. other uses of Crown or park land
- Fish
- Wildlife
- Basic versus. incremental costs

In addition, respondents made numerous comments about a lack of sufficient data and information in the panel's draft report. These gaps made it impossible to make informed decisions.

Conservation

A number of respondents said that the principles focused almost exclusively on recreation and revenue generation, with the exception of Principle #1 with its conservation focus. This led some to question the commitment to conservation and whether the recreation/revenue focus will relegate conservation to the sidelines. Conservation was viewed as the paramount priority by virtually everyone. A number of respondents said that if the government fully embraced Principles #1 and #2, they could accept the principles in their entirety.

Principles-based Approach

While some respondents lauded the concept of a principles-based approach, many found some of the principles to be unclear or lacking in detail. This raised concerns that the principles might be open to an interpretation quite different from the panel's original intent. Some respondents said it was not possible to accept all the principles as a bundle because they agreed with some and disagreed with other, leaving them compelled to reject Recommendation #1.

Assumptions

Several respondents said the principles were based on assumptions that were either "flawed" or were not subject to public input, especially the assumption that private enterprise will carry out much of the province's outdoor recreational activity and that recreation use and tourism will be promoted and greatly increased.

Rec. 1: Endorse Principles

The provincial government endorse the principles and use them to guide all decisions on the management and funding of fish, wildlife and park recreation opportunities.

There was a certain amount of support for the panel's approach of recommending that a set of principles guide management and funding decisions of the government. This recommendation indicates that all the principles be accepted as a bundle. This was problematic for a number of submitters who agreed with some principles and not with others. This led some submitters to reject the recommendation so as not to endorse those principles with which they disagreed. A related concern was that while certain principles seemed reasonable as stated, they would take on new meanings when compared to the accompanying consequences and be open to interpretation if adopted by government. Several respondents indicated that they could not support the first recommendation because they either didn't understand the terminology used in one or more of the principles or thought that the draft report provided insufficient data to facilitate an informed decision.

A number of respondents were not in favour of adopting the principles because of a focus on recreation and revenue generation at the expense of conservation and protection. This was seen as creating a possible conflict with the panel's first principle. It was also suggested that the panel didn't take into account the effects caused by a variety of cuts that have occurred due to budget reductions such as charging for firewood, creating stricter qualifying criteria for a disabled access pass, eliminating all interpretation, and closing 45 low use locations.

Authority and Governance

Rec. 2: Maintain Current Ministerial Authority and Accountability

Respondents suggested general support for the government to retain authority for the management of wildlife and parks. This view was premised on the assumption that conservation and preservation of parks and natural spaces should be the paramount concern guiding the recommendations of the panel and that only government, through accountability to the electorate, offers the necessary mechanisms in order to achieve this goal. It was believed that this option provides the most cost-effective management framework available as well as being able to dedicate the necessary resources to ensure conservation and protection without being subject to a variety of competing interests which may arise in a less accountable model.

There were frequent suggestions that a single minister should have ultimate authority for all legislative aspects of fish, wildlife, parks and recreation components. This was generally seen as the most effective means of coordinating and managing resources and ensuring that the government's responsibility for conservation and protection, as

well as other statutory obligations, are met. Having an elected official as the authority was also seen as an effective means of assuring accountability to the public. Some respondents were concerned that recommending some delegation of authority would create a conflict with the recommendation to maintain ministerial authority. There were concerns of a possible erosion of government control over conservation and protection as a result of weakened accountability.

The Park Act

Many respondents suggested that the *Park Act* should be retained as the legislative framework for parks management and that the duties specified in the Act should continue to be supported by taxes.

There was a strong opposition to potential changes to the *Park Act*, especially where these changes were perceived to weaken the Act's ability to remain the primacy document to ensure conservation and protection of the province's parks. It was often stated that the Act provides a stable platform upon which the principles of conservation and protection are able to withstand the changing priorities that accompany newly elected administrations. A number of the respondents expressed this view by referring to parks as a sacred trust while others suggested that the original intention of the *Park Act* was to ensure that parks were protected in perpetuity.

Respondents also stated that the Act strengthens accountability for protection and conservation by naming the government as the sole authority to manage and administer parks. Several respondents commented about a lack of mention of the *Park Act* in the panel's draft recommendations and expressed. They expressed the concern that this may indicate the current government's intention to change the Act in order to allow private involvement. This was seen as weakening the conservation and protection focus inherent in the Act and contrary to the original spirit and intent of the legislation. There were also concerns that the government intends to divest itself of responsibility for park's authority.

Several respondents expressed concern with statement "legislative changes may be required" in the draft recommendations and wondered about the actual intent of this statement. Among those who were more accepting of changes to the Act, there was interest in only minor changes to allow for the ability to increase revenue generation or, more often, to enhance and strengthen the current existing legislation in terms of conservation and protection values.

Conservation and Preservation

There was general agreement in regarding the panel's first principle that proposed the province's fundamental obligation to conserve and protect parks and wildlife. Respondents frequently stated that this principle must guide any recommendation with respect to adopting a governance model. There were many comments that the government has a responsibility to hold the parks in trust for future generations. Others added that the current status of natural environment in province has been well maintained through the foresight of existing legislation that has focused on conservation

and protection. Budget reductions were seen as being a major factor threatening the government's ability to effectively protect parks and wildlife

Economic Considerations

A number of respondents were concerned that economic considerations might compromise the government's priority to conserve and protect parks and wildlife. With respect to a governance model, concerns were that by having a body other than elected officials responsible for authority over parks, there is a risk that partisan or private interests might be able to force an agenda that could compromise the conservation in favour of other interests. There were concerns that this could lead to a loss of provincial control over various aspects of parks management. It was feared that once introduced, it would be unlikely that control could ever be returned to the province, regardless of the wishes of the electorate. Some respondents suggested that this type of model creates a fundamental conflict with the panel's first and second principles regarding conservation and protection. Similar concerns were expressed that the panel, by recommending fees for recreational opportunities, was laying the groundwork for an eventual governance model that would, over time, become reliant on private interests for funding and lead to dissolution of support for conservation and protection through tax revenues.

Single Ministry

Respondents indicated wide support for having the authority for Fish, Wildlife and Parks located in a single ministry. It was suggested that a single ministry, supported through legislated authority, would provide the most accountable model to ensure conservation and protection principles were upheld. This single ministry was thought to offer the most efficient and cost-effective means to ensure the coordination of limited resources. Among respondents that supported this model, it was generally believed that any dispersal of authority would weaken the government's ability to fulfil its fundamental obligation for conservation and protection of parks and wildlife. It was suggested that this model would allow for greater integration and coordination of planning and research while minimizing overlaps in program service delivery and duplication of administration. Furthermore, it was suggested that the public would benefit through this model, as it would offer the ability to provide one stop shopping, eliminate confusion about where to access appropriate services, and eliminate the possible requirement of having to access various services through multiple ministries.

Accountability

Maintaining public accountability for the management and administration of parks and wildlife was regarded by many as vital to ensure that the government's responsibilities for protection of the environment are met. The majority of references addressing this issue suggested that this can best be achieved by having an elected official, who is ultimately answerable to the people of the province, vested with the responsibility for carrying out the duties of the applicable legislation. It was also suggested that the minister responsible should be required to issue regular 'State of the Parks' reports to the provincial legislature as a means of enhancing accountability.

Special Operating Agency

There was little support for the concept of delegating authority for Fish, Wildlife and Parks to a special operating agency, Crown corporation or commission. These models, which would operate at arms length from government, were perceived as potentially weakening government control over conservation and protection. There were also concerns about losing the public accountability inherent in having elected officials responsible for the decisions and actions of the organization. Further, it was stated that this model might allow decisions to be made based on outside influences and pressures that were not necessarily in keeping with the public interest. Where there was support for moving authority to a special operating agency, it was reasoned that traditional ministries were not as efficient or cost-effective as an agency with limited focus.

Rec. 3: Engage First Nations

The Ministry Use A Combination Of Approaches To Meaningfully Engage First Nations In The Management, Funding And Delivery Of Fish, Wildlife And Park Recreation

Many of the respondents agreed that First Nations should be involved in management, funding and program delivery. Some respondents suggested that First Nations bring a cultural tradition based on strong land values that would be a valuable resource for planning and decision-making. Furthermore, it was suggested that First Nations are a separate level of government and must have a voice on issues that potentially affect their rights. Respondents also commented that the principles of conservation must be maintained and that there are issues of public ownership that must not be compromised.

Fully Support Existing Agreements, and New Agreements Made Through the Treaty Process

It was suggested that close consultation with First Nations is critical to the success of any long-term recreation or conservation strategy in the Province. The comments revealed a variance in understanding about how far First Nation's rights extend. Some respondents suggested that any negotiations with First Nations should be considered a government-to-government process. Others that believed that First Nations rights are not absolute and any decisions made unilaterally between the Province and First Nations must incorporate the rights of all British Columbians. While there was general acceptance for supporting existing agreements, there were some concerns about whether First Nations and the province have conflicting agendas or goals with respect to land titles. There were also concerns about the direction of future policies and agreements. Furthermore, it was suggested that some new agreements might have to be questioned even though they have gone through the treaty process. Some respondents commented that any future agreements must not compromise treaty negotiations and that any agreements should encourage accountability.

Expand Opportunities For Management Involvement and Recreation Service Delivery Through New Interim or Pre-Treaty Agreements

It was stated that, while First Nations should be involved in the various parks and recreation processes, the panel's draft recommendations are too heavily weighted with First Nation's pre-treaty assumptions.

First Nations' Participation, by Mutual Consent, on Advisory Bodies

Regarding First Nation's participation on advisory bodies, there were comments that First Nations have constitutional status as a separate government and would not likely accept a role that was only advisory. It was suggested that First Nation's role should be considered a partnership with meaningful involvement, which was deemed necessary to the establishment of a workable governance model. Several respondents thought that other groups should be included in the advisory bodies in order to balance and represent the wide range of interests concerned with the management, funding and delivery of fish, wildlife and park recreation. Some of the suggested groups included the Guide Outfitters Association of British Columbia, the B.C. Trappers Association and the B.C. Wildlife Federation.

Rec. 4: First Nations - Cultural Values

Consult and Work Jointly with First Nations to Protect Culturally Significant Values

Although some respondents pointed out that this recommendation was outside of the panel's mandate, it was thought that the importance of the issue warranted its inclusion. It was stated that First Nations view their participation in wildlife and fish management as an important aspect of their culture and, given their constitutional status as a separate level of government, there is need to consult and work jointly with First Nations. There were comments that this recommendation presented opportunities for cultural recreation and tourism as well as increasing the recognition and appreciation for First Nations culture.

Rec. 5: Organizational Scope

Fish and Wildlife Management Organization, a Park Management Organization and an Outdoor Recreation Management Organization

While there was support for establishing three separate management organizations, there were concerns that the draft report provided too little detail about the organizational hierarchy, the functions of the separate organizations and the ultimate reporting structure. Further, respondents thought that reorganization is a time consuming and budget-intensive process, especially during a climate of budget reduction and given that cuts in funding that have already occurred. It was suggested that streamlining administrative and coordination processes would benefit the overall operational capacity of the organizations and produce cost-benefits through the reduction of administrative overlaps. Furthermore, this structure would allow for greater focus on the unique program areas. It was suggested that for this to be effective, an overall coordinating mechanism had to be in place to ensure the appropriate

management and dissemination of critical information resources and communications as well as to arbitrate and manage conflicting priorities that might occur within the three organizations. Strong central strategic planning and the ability to monitor regional concerns were also mentioned as key components necessary to facilitate this structure. Some respondents were concerned that existing legislation might be altered to facilitate the establishment of this model. It was suggested that if this were necessary, care should be taken to ensure that conservation and protection elements were not weakened.

Clarification of Terms and Details in the Draft Report

There appears to be some confusion about whether the panel recommended three separate ministries or three departments under the umbrella of a single authority. Respondents' support for a scenario was apparently based on their understanding of the panel's recommendation.

Others commented that the panel did not provide sufficient detail in the draft recommendations so that they could determine the extent and consequences associated with the presented model. There were questions about the responsibilities and functions of the new organizations, the management and organizational structure, the decision-making process with respect to differing priorities among the three organizations, the dispute resolution mechanisms and the weighting of conservation principles against recreational issues within the various organizations.

Three Organizations Under a Single Authority

While a number of respondents expressed support for the concept of a Fish and Wildlife Management Organization, a Park Management Organization and an Outdoor Recreation Management Organization. Many of these suggested that overall administration for these elements should fall under a single authority. A single authority was seen as being necessary to ensure a coordination of efforts, the integration of communications as well as to minimize inefficiencies through the reduction of administrative overlap. Furthermore, it was suggested that comprehensive working and business plans be developed in order to assist and guide the implementation of this model. Establishment of this organization would also require the dedication of appropriate budgeting and staffing resources. One of the benefits anticipated by the establishment of the three management organizations was the opportunity for specialized and experienced individuals to be placed in departments with focused mandates while having access to the integrated information and planning resources inherent in the single authority model.

Some respondents recommended that the recreation segments and relevant components of the Ministry of Forests, Ministry of Sustainable Resource Management, and Land and Water BC be included with the outdoor recreation department. Another respondent suggested that responsibilities for water and air quality and waste management should be in a different ministry to avoid interference with the focus on parks and wildlife issues. It was also suggested that BC Hydro recreation sites are already well maintained and should not be integrated into the proposed structure.

Competing Interests Between Divisions

There were concerns that conflicts that could arise through the separation of functions, especially in the areas of land use and where issues of fish and wildlife management are contrary to those of outdoor recreation. This could lead to disputes where competing interests could hamper the efficiency of program delivery or decrease the effectiveness of conservation and protection efforts. It was suggested that a comprehensive dispute-resolution mechanism be developed and that the government retain the final decision based on the public interest.

Inter-connected - Three Organizations Must be Closely Linked

Respondents suggested that the most efficient means to ensure coordination and inter-connectivity of the three management organizations would be to place them under a single ministry. This structure would allow for centralized planning of communications and information resources as well as minimize administrative overlaps. There were comments that individual organizations should have clearly developed mandates and there should be processes to facilitate effective liaison between organizations. It was also suggested that effective linkages must be in place to accommodate the flow of information regarding regional concerns.

Rec. 6: Strong Regional Presence

The respondents believed that maintaining a strong regional presence would be an important component to effectively administer and coordinate the province's conservation and recreation management efforts. While it was recognized that each region of the province has its own issues and needs, it was also believed that there should be a centralized coordination mechanism to ensure that province-wide principles and goals would be met. There were concerns that if too much control was delegated to regional authorities, there would be a risk of losing control of priorities to vested interests and fragmenting the province's responsibility to ensure adherence to various policies and principles. It was suggested that a strong regional presence would allow for local input and ensure that regional disparities were recognized while enhancing the province's knowledge base and increasing the ability for critical decision-making.

Direct Reporting Relationship to the Central Authority

While there was general support for direct reporting to a central authority, there were concerns about how this would be coordinated. An effective means of ensuring communications between the regions and the central authority would need to be developed. Further, policies setting out levels of decision-making would need to be established and the final authority identified for various issues. There were other concerns regarding regional variation in standards and excessive bureaucracy costs associated the operation of a number of different bodies.

Management Alternatives

Rec. 7: A Range of Consultation Mechanisms

A number of respondents made reference to the importance of consulting the public and various stakeholders regarding management and funding issues. While there was much support evident for the establishment of advisory bodies, there were also concerns that these bodies are not necessary and that an adequately funded and fully staffed ministry should be able to perform the responsibilities proposed for the advisory bodies. It was suggested that the establishment of the bodies would create more bureaucracy and that the operation of advisory bodies would be expensive. Also, coordinating the information flow and maintaining an efficient decision-making capacity were expressed as concerns.

Advisory Bodies – General Comments

It was suggested that advisory bodies should report directly to the minister and should be involved in the development of policy in order to be effective. Appointments to advisory bodies should be transparent, although this raised the concern that government-appointed members would reflect the government's point of view. There was a comment that if separate advisory bodies were struck for each aspect of park management, there would likely be an overlap of jurisdiction resulting in communication difficulties and unnecessary bureaucracy. As well, it might be difficult for the advisory bodies to balance issues regarding recreation when the major focus of the public is conservation. Others were concerned that advisory bodies would be used to minimize government responsibility for parks and wildlife. There was also a concern that there is no advisory capacity recommended for outdoor recreation. It was stated that private interests should not be part of the decision-making. Parks Canada's periodic national forum was identified as an approach that might provide a model for collecting provincial input.

Provincial Advisory Bodies

There was a concern that the viability and size of a provincial advisory body as recommended, might be too ambitious and have too broad a focus. This view was furthered in the comment that advisory bodies are expensive to operate and would have to be adequately funded and staffed to function effectively. It was suggested that during a time of budget reductions, establishment of the bodies might not be feasible. An added consideration was the initial establishment of advisory bodies followed by the development of regional bodies at a later date. Respondents suggested that the role of the provincial advisory bodies should include providing advice on changes to fees and the power to delegate, but retain the overall responsibility to ensure adherence to all the guiding principles.

Separate Standing Regional Advisory Bodies for Fish Management and for Wildlife Management

Several respondents expressed the need for having local expertise representative of the various stakeholders. It was thought that the inclusion of various stakeholders would be an effective means of developing partnerships and identifying resources and funding opportunities. It was also suggested that all advisory and consultation mechanisms should be required to draw on tourism operator expertise in the affected planning area since operators must have input in determining how the lands and resources are planned and managed. Other respondents stated that proportional recognition be given to organizations based on their membership and monies generated. Others suggested reducing the number of regions in the province or moving to centralized representation. They reasoned that regional decision-making by local groups is neither provincially representative nor accountable to the greater consensus of the province. This view was furthered by the comment that natural resources belong to all provincial residents, not just those who live near the resource.

Site or Issue-Specific Advisory Bodies for Park Management Issues

Respondents commented that site or issue-specific advisory bodies work well when all interests are represented and all stakeholders included. The current Strathcona Park Public Advisory Committee, which is composed of members with a wide range of interests and varied expertise on the Park, was given as an example of an effective body. It was stated that these bodies are not effective if they do not have a transparent selection process and become dominated by special interest groups.

Continued Ad hoc Consultations for Specific Issues

The current situation with ad hoc and special purpose consultations was identified as operationally difficult for non-governmental organizations. Requests for input have typically been made with short notice and across several ministries. The use of regional advisory bodies was suggested as a more effective solution for dealing with issues and a more encompassing option than the narrow mandate of ad hoc consultations.

Rec. 8: First Nations an Integral Part of Each of the Advisory Bodies

There was general agreement that First Nations should be an integral part of each of the advisory bodies, although most suggested that First Nation's role should be more than advisory. There were concerns that, without prior recognition of First Nation's rights and title, participation on advisory boards would be seen as an empty gesture. In addition to First Nations, it was suggested that the advisory bodies be composed of the wide interests in recreation and strive to be balanced so one interest group is not over-represented at the expense of other groups.

Regional Wildlife Management Process Being Piloted in Prince George

Most respondents addressing the Regional Wildlife Management Process being piloted in Prince George suggested that more details were required before comments could be provided.

Rec. 9: Advisory Bodies Provide Advice to the Minister

There was concern that the use of advisory bodies would have the potential to curtail public consultation. It was suggested that public input and accountability for decision-making must be maintained in order to assure the publics' continued support. Respondents commented that the minister should remain responsible for decision-making, including responsibility for those decisions coming from an advisory body.

Certain Decisions may be Delegated to Advisory Bodies

Respondents' opinions appeared split about delegating decision-making to advisory bodies. Those who favoured this recommendation stated that the process should remain transparent and accountable and that the make-up of the bodies should be representative. It was suggested that government staff had little opportunity to spend time in the field and lack the current information needed to make decisions. As such, their role should be to provide scientific and technical advice and information to the regional processes. Those who had concerns about this recommendation commented that the government should have final decision-making authority. As well, there were concerns that advisory bodies might be influenced to make decisions not in the interest of the larger provincial good and would lack the accountability of an elected official.

Rec. 10: Advisory Bodies Supported by Adequate Staff and Financial Resources

Respondents suggested that in order for advisory bodies to be effective, they would require adequate resources. There were concerns that advisory bodies would be expensive to manage and could drain already scarce financial resources. Further comments addressed funding sources and suggested that government should fund the bodies. Allowing private interests to contribute to funding could risk having decisions influenced in favour of those interests. Some of the issues raised were whether support included participant funding and whether staff would be assigned to these bodies from the base budget. Furthermore, funding would have to be provided for administering regional processes.

Rec. 11: Appointment To Advisory Bodies

Appointment To Advisory Bodies Be Based On A Willingness To Represent The Public Interest And The Protection Of Conservation And Recreation Interests

Many respondents suggested that appointment to advisory bodies should be based on qualifications and should not be political appointments. There was concern that political appointments would be open to abuse and not representative of the public interest. It was suggested that those appointed should have either a conservation or scientific background or have experience in the area of parks, wildlife or fish management. Overall, the make-up of the bodies should reflect the diverse nature of the public interest. Clear conflict of interest guidelines were also suggested.

Rec. 12: Engage Partners and Volunteers

Engage All Types Of Partners And Volunteers That Will Result In Improved Service Delivery Without Compromising Protection And Conservation Standards

Respondents suggested that public consultation should occur prior to the inception of any partnerships and that not all types of partnerships would be appropriate. There was a general view that partnerships with volunteers and non-profit groups would be preferable to partnerships with business and private interests. Respondents often stated that partnerships should be based on the principle that conservation and protection standards should not be compromised.

Partnerships and Privatization

There was much concern regarding the government entering into partnerships with private interests. It was stated that government should not enter into partnerships, particularly with for-profit interests. It was suggested that establishing working relationships with non-profit groups, volunteers and local or regional groups was preferable and that these groups should be environmentally and socially responsible.

There were fears that partnerships could entail the introduction of privatization, lead to financial risks and jeopardize the integrity of management plans and objectives in favour of creating a profitable environment for business interests. Partnerships that involved international companies could risk becoming subject to the terms of NAFTA, at which point the government would risk losing control over its natural resources. Respondents who accepted partnership believed that public consultation should occur before any partnerships were entered into, that goals and objectives should be clarified and, that standards be established, especially with respect to conservation and protection.

There was a stated preference for giving priority to local companies in any partnership arrangements. There were concerns about creating a monopoly by using larger scale corporate entities that regionally manage parks, fish and wildlife. As well, there were opinions that the government should clarify issues regarding ownership of the resource and that all resources should remain publicly owned. Some respondents thought that partnerships could reduce administrative costs, although the government would be required to establish a regulatory agency to oversee and monitor activities. It was believed that establishing partnerships with universities could provide human resources for interpretation and educational programs and research studies. As well, tourism and outdoor recreation organizations might also be interested in participating in the operation of BC's provincial parks. Volunteers were often mentioned as the most appropriate groups with which to establish partnerships.

Rec. 13: Existing and New Partnerships and Volunteers

Both Existing And New Partnerships And Volunteer Relationships Should Be Used When They Will Result In Improved Service Delivery And Where They Will Not Compromise Protection And Conservation Standards

Respondents generally endorsed the use of volunteers. It was believed that volunteers supply a dedicated and capable resource and require relatively minimal expense by government. There were concerns that the government may no longer be able to afford the costs of supporting park hosts, wardens of ecological reserves and other partnerships with volunteer individuals and organizations. It was pointed out that the government had terminated the Park Extension Officers, who were seen as playing a critical role in coordinating park volunteers. Contributions of volunteers were said to include habitat restoration, litter clean up and monitoring of park management as well as providing a human presence to increase the security of parks park visitors as well as reduce crime and disturbing behaviour. The U.S. National Park Service has been very successful as each year more than 120,000 volunteers donate over 4,000,000 hours of service in the U.S. national parks. It was stated that the main costs incurred through the involvement of volunteers are reimbursement of volunteers' out-of-pocket expenses, public liability and personal accident insurance, supervision and/or management by paid staff, training costs, facilities and miscellaneous costs such as newsletters and catering for special events.

Rec. 14: Partnerships With Business

The Ministry should enter into selected partnerships with businesses

Respondents opposed to the establishment of business relationships in parks generally indicated that such relationships would compromise the government's ability to conserve and protect the environment in favour of creating a profitable climate for business. The concerns were that government could lose its ability to control environmental standards and lead to the "Disneyfication" of parks. Furthermore, respondents thought that commercial enterprises might involve permanent infrastructures that detract from natural values. Loss of public access to some park areas, an increase in motorized activities and introduction of corporate logos into parks were also identified as concerns. There were comments that corporate interests could be concerned with generating revenue and increasing profits, which was viewed to be at odds with conservation and protection as well as the basic intention of parks. Some indicated that the distinguishing feature of a park is that it is an area free of human commercial activities and that the by introducing businesses or advertising into parks carries the risk of destroying the unique features that gives parks their value as attractions.

Some respondents questioned the need for business partnerships and indicated that parks have been experiencing cuts in funding, with more cuts anticipated as suggested in the Service Plan. The concern was that although cuts are occurring, revenue to the provincial government from fish, wildlife and parks recreation already far exceeds

provincial expenditures. If this revenue were restored to park's expenditures, the need for additional funding sources would be diminished.

Respondents commented that the discreet use of logos on brochures, guides and checklists might be acceptable. If business partnerships are undertaken, it was suggested that revenue generation should not be allowed to compromise the integrity or the image of the provincial parks and that the ethics of conservation and protection should remain the priority by which any business partner would be bound. Furthermore, legislation should be introduced to outline the parameters and authority of partners and provide the government and public with a control mechanism to ensure that the parks vision of conservation and protection would be upheld.

Brand Naming

Respondents stated that corporate interests should not be able to use the BC Parks logo or other signifying devices. Reasons given included that the public has the right to know if they are dealing with a public servant and that the BC Parks brand might not be compatible with certain commercial ventures. Should the government extend branding to the commercial sector, it was suggested that care be taken to ensure that partners are compatible with the integrity of the BC Parks brand.

Rec. 15: Public Input on Fees

Most of the comments related to public input on fees did not address the public involvement in fee-setting, but stated opposition to fees. The few who did address the fee-setting process generally supported the idea that the public should be involved if new fees are introduced.

Provincial Government Maintain a Strong Role in Setting Fees as a Way of Protecting the Public Interest

Respondents commented that only the province should set fees, including those to be charged by any commercial interests. By having government set fees, public accountability would be retained. These fees should include those instituted in the parks system by the government; such as park use permit fees, as well as fees established by holders of such permits. It was also stated that the setting of fees should not be reliant on cabinet approval.

Role of the Provincial Advisory Bodies include Advice on Changes to Fees

It was suggested that provincial advisory bodies charged with advising on changes to fees should seek public input prior to providing that advice. Also, the advisory bodies should be composed only of representatives of those interests that are affected.

Rec. 16: Specific Recreation Opportunities

Existing Legislative Requirements and Constraints (e.g. Park Act)

Respondents indicated that the *Park Act* should be retained and that all decisions are subject to the Act. The Act has been successful in protecting parks but minor

amendments may be required to increase the revenue generating capacity and direct the revenue back into the park system.

Policies and Standards Recommended by Advisory Bodies

It was stated that advisory bodies should help guide and inform government but not dictate final policy, as advisory bodies are susceptible to conflicting interests. There was a concern that policies and standards recommended by advisory bodies may be inconsistent with the legislation and the current impact assessment process.

Impact Assessment Processes that is Appropriate to the Scale, Risk and Potential Impacts of the Decision, and Includes Opportunities for Public Consultation

It was stated that the public consultation aspect of this recommendation should be mandatory. Also, impact assessments should be done to ensure environmental standards.

Rec. 17: Comprehensive Outdoor Recreation Strategy

The Provincial Government Should Prepare a Comprehensive Outdoor Recreation Strategy

It was suggested that the panel's first principle regarding conservation must be maintained and its valued not impacted by the strategy. The government should first conduct a comprehensive conservation strategy and then use that to guide the recreation strategy. This approach could be used to bring together the numerous conservation principles contained in such legislation as the *Park Act*, the *Environmental Reserves Act*, the *Wildlife Act* and the *Land Reserves Act*. Respondents indicated that the recreation strategy should be developed on a regional basis and use individuals who are knowledgeable in the field of outdoor recreation. It was further stated the once the strategy was developed it would be important that it be implemented.

There were questions about whether the strategy would address backcountry recreation plans, conflicts such as snowmobile use versus non-motorized use, and balancing tourism and outdoor recreation values. Further questions were posed about how the strategy would fit with regional Land and Resource Management Plans. It was suggested that there should be clear separation between motorized and non-motorized recreation opportunities on all Crown land and that dispute resolution mechanisms would be needed for disputes, not only between different types of outdoor recreation, but also between recreation and the environment.

There were concerns that developing the strategy is an enormous undertaking, will require extensive funding and that the government would not support such an undertaking at this time. Funding would be required for advisory bodies, which would include costs related to wages for advisory body members, administrative costs, public input costs, costs related to implementation of strategy, and costs for ongoing activities. It was suggested that disputes could be managed through the proposed Department of Outdoor Recreation.

Rec. 18: Fish-Based Recreation

Increase Special Angling Opportunities to Increase Participation and Economic Benefits

Respondents commented that the province could gain if it found the resources necessary to expand the sport fishery; expansion has the potential to significantly increase the social and economic benefits to the provincial economy. For this to occur, it was suggested that significant investment should be allocated to sustainable fisheries programs. There was concern that stocking low use lakes might occur and these costs would not be recovered. This concern was based on the statement that low use lakes provide an opportunity to escape crowding, which is an important consideration for many anglers when choosing a destination.

Expand "Quality Fisheries" Opportunities on Small Lakes

There were comments that artificially supported sport fisheries are a big draw into many parks. However it was also thought that the government should seriously review fish stocking in provincial park lakes with the goal of terminating stocking in many lakes and allowing for the restoration of the original aquatic life. It was suggested that funding ratios for fish stocking should reflect the use of the resource and that the fish stocking program could be funded using a relative percentage of revenue collected from those stocked lakes in provincial parks where fees are being collected. An alternate suggestion was having park operators "order and buy" fish for the lakes in their park operating areas. There was concern that there should not be expansion on small lakes that do not have the upland support infrastructure to accommodate increased public use.

New Fish Stocking Programs in Areas of High Demand

A number of respondents expressed concern about stocking lakes with non-native species as this can have negative and destructive effects on amphibians, other non-fishable species as well as the general ecosystem. It was suggested that stocking should only occur where it has been done in the past and that no new stocking should be introduced. The requirement for stocking indicates that an existing resource is being over used beyond the population's carrying capacity and therefore conflicts directly with the ministry's mandate for conservation and protection.

Maintain the Provincial Fish Culture Program

There was a concern that this recommendation did not specify that the government should continue to fund or operate the program. Some stressed the importance of having the culture program managed within government, rather than through private enterprise, to ensure that the program is closely linked with broader fisheries and fish habitat programs. Some stressed that the current management of the fish culture program is world renown for the knowledge of the staff, quality of the products, development of new culture techniques (e.g. bull trout and white sturgeon) and attention to both wild stock recovery and recreation enhancement. Some respondents suggested that the management of the provincial fish culture program must be based on sound aquatic ecosystem management principals and not just optimal fishery performance.

There were also economic arguments that the fish culture program pays for itself through fish licence revenue and indirect economic benefits, especially in rural areas, associated with world-class recreational fishing opportunities.

Ensure Ongoing Evaluation of Specific Stocking Programs and Optimal Fishery Performance

Respondents commented that that local stewards and anglers should be included in discussions regarding the requirements for their watersheds. It was also stated that fish stocking should remain government funded and continue the high standards that have been carried out in the past.

Look to Further Increase Efficiencies in the Operation of the Major Hatcheries

Comments included encouraging opportunities for small volunteer hatcheries to supplement the provincial stocking program since many clubs and community groups have developed their expertise under the guidance of the federal government. One group argued that the program could be delivered at a greatly reduced cost by the private sector. Respondents also stated that property management of the hatcheries should be moved from British Columbia Building Corporation (BCBC), become assets of the ministry and be subject to the same set of laws as BC Parks facilities. It was also suggested that the government should reduce reliance on hatcheries by restoring natural ecosystems.

General - Interpretation and Education be Re-instated

The respondents' comments indicated that there is general support to re-instate interpretation and education programs. Further to this, it was recommended that a comprehensive environmental education plan be developed to address educational opportunities for children, youth and adults in both the formal education system as well as in non-formal educational settings, such as sites in parks and protected areas and in programs such as Girl Guides and Scouts. It was contended that continued development of learning resources that are closely linked with the provincial education system provide educators with current and meaningful information about local fish, wildlife and habitat and foster community-based involvement in regional relevant issues. Furthermore, continuation of the professional development workshops was seen as important because they help to insure that formal and non-formal educators continue to promote environmental stewardship. It was pointed out that restoration of educational and interpretive programs would incur costs related to start-up and ongoing operations and that these activities should be funded from general revenue and not be based on a user pay system.

Fish Hatchery Interpretation and Education

Respondents suggested that the panel created a contradiction by recommending that education and interpretation be restored at fish hatcheries while also suggesting that education and interpretation be restored for conservation purposes and not recreation purposes as hatcheries primarily provide a recreational opportunity. There were also suggestions that hatchery programs be provided in conjunction with educational institutions.

Simplify Angling Regulations

There was general support for simplifying the angling regulations. Other suggestions included allowing room for some regional variations so that the science-based approach could be used, and developing a set of province-wide standards (e.g., for summer run steelhead).

Rec. 19: Wildlife Recreation

Expand Special Hunting Opportunities – general comments

The most common viewpoint regarding the expansion of special hunting opportunities was the need to ensure conservation and protection are the paramount consideration. The use of scientific inventories to identify species that can support expanded hunting was suggested. There were concerns that economic motivation may outweigh conservation principles. Some respondents were opposed to expansions of hunting on moral grounds and because they believe a declining minority of people hunt.

Another common opinion was that the revenue potential was significant, particularly in rural and remote areas. Economic benefits included activity in many sectors such as transportation, food and beverage, accommodation, and equipment. Others pointed out that hunters make a valuable contribution through fees, taxes and also volunteer activities and donations. A contrary view was that non-hunters actually subsidise hunting by paying taxes to protect the animals that are hunted. As well, a few thought the idea of raising additional funds through killing animals was unethical.

It was clear in the submissions that a few of those commenting believed that hunting was taking place in parks and that this was inappropriate and unsafe.

There were specific suggestions about how to expand hunting opportunities, such as developing a moose harvest strategy, a habitat management plan for black-tailed deer, Roosevelt elk and Blue Grouse on Vancouver Island and controlled burning to restore Rocky Mountain bighorn sheep in the East Kootenays.

Some general points raised regarding hunting were the need for at least a doubling in capacity of conservation officers to bring enforcement to pre-cut-back levels, the need to increase the emphasis on wildlife viewing and the need to recruit youth into wildlife recreation.

Special Hunt Auctions

Only a few commented specifically on special hunt auctions and they were evenly divided between those who opposed them as being elitist and those who saw them as a cost-effective way of increasing revenue. There were concerns that this would lead to poaching, and that by focussing on taking the biggest and best animals, the gene pool would be weakened.

Targeted Hunts in Agriculture-Wildlife Conflict Areas

This idea was supported in the submissions that offered comment. It was suggested by some that this would only be appropriate in areas where game species have been introduced and are degrading local ecosystems, like deer on the Queen Charlotte Islands/Haida Gwaii. One respondent saw this as a last resort only if good farm animal husbandry is already being followed.

Additional Special Season Trophy Hunts

Trophy hunts were not supported because they were thought to be contrary to a conservation ethic, give a negative image to our province as a whole, and because of declining populations. It was suggested that the name “trophy hunt” was part of what made the idea unpopular.

Interpretation and Education (Wildlife Viewing)

There was very strong support for restoring and expanding the education and interpretation programs, largely because they set the foundation of a parks and wilderness ethic for future generations. Some of the respondents saw this as a key element of the draft that deserved more prominence and its own recommendation, partly because hunting is on a decline and wildlife viewing is on the rise. There was discussion about the dramatic increase in wildlife viewing and photography and the economic benefits of this activity in the “shoulder season” and in rural areas. Ways to improve the programs included building of viewing platforms, better information about wildlife, interpretive signage, guided tours, and auctioning of wildlife photo opportunities. Respondents provided examples of where funding has been increased for interpretation and education in other jurisdictions (e.g. Saskatchewan and California) and claim that British Columbia is an embarrassment because we no longer have a program (joining Mississippi and El Salvador as the only jurisdictions in North America without interpretation programs).

Simplify Hunting Regulations

There was agreement with the need to simplify hunting regulations. It was added that youth recruitment should be considered in the review along with the complexity of land classifications and the designated wildlife schedules. There was a caution that harmonizing province-wide was not necessary or desirable given regional diversity and the preference for a science-based approach.

Implement the Wildlife Harvest Strategy

Only a few respondents referred to this section and they all indicated that they needed more information to provide comments.

Rec. 20: Park Recreation

Develop Categorization System

Some respondents stated that a categorization system already exists and that park management plans must be completed throughout the province to describe the purpose, ecosystem objectives and appropriate uses for each park. There was concern

about opening up the Park Act to make changes to this system. Others saw the advantages of refining the existing system to make improvements, but only if stakeholders were involved in defining appropriate uses and funding for this came from general revenue. The overwhelming concern from many respondents was that a categorization system is one tool to allow for expanded human uses of protected areas, commercialization of parks and increased opportunities for intensive revenue-generating activities.

Re-Instate Park Interpretation and Education

There was overwhelming support to re-instate the park interpretation and education programs and a view that this should stand alone as a recommendation. These programs were seen as an essential component of Park activities necessary for long-term support of Parks, the best way to teach people how to experience and use the parks while minimizing their impacts, an essential way of learning about the beauty and environmental issues in our forest, a way to encourage ecological responsibility and a way to enhance health and fitness. Some suggested that highly trained provincial staff provide the programs and others suggested that this would be a great job for university students. There was confusion and disagreement with the distinction between conservation and recreation purposes - and a belief that both should be enhanced.

Increase Efficiencies in Contracting Camping and Day Use Facilities Operation

Respondents were not sure what the panel meant by “increase efficiencies” and many wanted to see financial data so they could compare the current system to a more efficient system. There was a concern that “increased efficiency” might mean a reduction in services and union jobs and increased fees for the public. They also wanted to know where the savings would go (e.g. back to the private operators?). A number of respondents did not like the idea of “bundling” parks so that local small operators could not compete. There was also concern over long-term leases and the potential for private operators to gradually take control of parks.

Encourage New Commercial Recreation Services

The most frequently expressed view was that commercial activity should be encouraged outside of parks on Crown land, but not within parks. Even so, some cautioned about the negative and costly impacts of adjacent commercial activity on parks (e.g. Mount Washington/Strathcona Park). There was a related desire to ensure that commercial activity near parks is subject to meaningful public planning processes, for example through local government zoning or regional land use plans.

There was a general distaste for the term “commercial” recreation in relation to parks, among many respondents. They saw commercial activity as being in direct conflict with the conservation goals of parks and the highly valued wilderness experience that people from BC and all over the world seek out in BC parks. Conservation was mentioned many times as being much more important than creating commerce. Even with the conditions placed on commercial activities by the panel, this was seen as the path leading to Banff and Yosemite, with clogged highways, crowded parks and rampant commercialization.

Many respondents focused on the negative impact commercialization would have on the solitude and wilderness experience, be it from the presence of commercial enterprise, crowding or increased motorized traffic on trails. It was argued that commercial services would connect no one with the natural environment. The need to protect the pristine wilderness experience was highlighted in relation to high quality user experiences along with the suggestion to maintain a wide diversity of experiences to cater to a broad market.

Some pointed out that the Park Legacy panel consulted with the public on this topic and concluded that commercial development in parks was not appropriate. Others encouraged use of the park management plans as a tool to address this issue.

The only part of the recommendation regarding new commercial services that was fully supported by those who provided comments was increased accessibility for people with disabilities.

There were a few respondents who indicated conditional support for increased commercial activity. Some of the provisos that were suggested included application of the precautionary principle and use of the park management planning process, and the bullets following the next element of Recommendation 20 (regarding intensive revenue-focused locations).

Permit a Limited Number of New Intensive, Revenue Focused Recreation Locations

The comments regarding this section closely matched those in the previous section, particularly that this type of development should not happen in parks. Most respondents were strongly opposed for the reasons outlined above. There was little assurance provided by the suggestion that a provincial advisory body must endorse these locations since there is potential for these bodies to be stacked with specific interests.

A small number of respondents accepted the idea, some with conditions such as application of all the constraints listed by the panel, contracting only with not-for-profit stewardship groups, ensuring that non-commercial users are not displaced, monitoring impacts on adjacent areas, and accruing economic benefits to the parks system and local community. One group thought that a park lodge might be a suitable facility if it were consistent with the park management plan.

There were a few specific comments about the example of Mt. Robson as a potential location. It was argued that there is already a commercial operation on private land adjacent to the park and expanding the Visitor Centre for commercial activity would be inconsistent with its designation as a World Heritage Site. It was also pointed out that the long-time owners of the commercial operation sold BC Parks the property on which the Visitor Centre stands and that the short tourist season would make it impossible for two commercial operations to survive at that location.

There was quite a bit of confusion and suspicion about the condition that the locations directly affect less than 100 hectares of land within the entire park system. People did not know what “directly affected” meant and suggested that the 100 acres was an arbitrary limit. Some respondents were mistaken and thought that the limit meant 100 ha per park rather than for the entire provincial park system. The number was seen as meaningless because the impact resulting from size of the footprint would vary depending on the type of habitat or terrain and also because the impact would be felt indirectly across a much wider area. There was also a fear that there would be a temptation to expand beyond 100 ha if these locations proved to be successful.

Rec. 21: Outdoor Recreation on Crown Land

This recommendation was strongly supported. Some of benefits listed were social well-being and economic spin offs in rural communities, education value, damage control and public safety, control of public use in provincial forest, and good public relations for the Ministry.

There were questions about who should manage these areas, and suggestions that management be transferred from Ministry of Forests to the new ministry responsible for all outdoor recreation.

Some highlighted the costs associated with carrying on these programs and indicated that budget cuts have made it impossible to management recreation trails, sites and roads. It was suggested that forest companies should pay for road maintenance as the cost of building the roads was originally deducted from stumpage fees. Others spoke about the hours of volunteer time dedicated to maintaining sites and trails.

Some highlighted the need for zoning, management and enforcement to control motorized vehicles (i.e. snow mobiles and ATVs) on Crown land.

Funding Alternatives

Rec. 22: Adopt Funding Model for Fish, Wildlife and Park Management

Funding for Conservation and Protection

The draft funding model proposed by the panel was not well supported or understood by respondents. There was difficulty in distinguishing between base level and enhanced level of services and funding and understanding where various activities and programs would fit (e.g., planning, monitoring, research). There was strong support for government to fund conservation and protection from general revenue.

By far the most common viewpoint was that government should not only fund base level, but also the enhanced level – and this was seen as being in keeping with the panel’s first two principles. There was a related fear that over time the government would change the definition of “base” to shift more and more of the costs on to users.

Some stressed the need for stable funding from government for parks, even in times of economic downturn, to protect ecological integrity.

A few respondents offered conditional support, provided that clear guidelines were established through a public process, defining an appropriate “base” level of services. Others supported the idea if the principles were upheld and if the level of funding were adequate to restore the level of services prior to recent budget cuts.

Recreation: Incremental Costs of Providing Recreation Opportunities Funded Through User Fees

The idea of user fees for day-use and non-consumptive use of parks and Crown land drew by far the highest number of comments of all topics in the draft report, and nearly all of them were negative. Respondents identified uses they were prepared to pay fees for, e.g. hunting, fishing, camping, and in some cases, parking, but not non-consumptive uses such as walking, hiking, biking, canoeing, and picnicking. Most saw parks and Crown land as a public trust and legacy for future generations that should be enjoyed freely. User fees were seen as a tax grab and as a way of limiting access for those with low incomes. Some saw user fees in provincial parks as the thin edge of the wedge, leading to fees for local and regional parks. Some focussed on the difficulty and high cost of collecting fees and suggested that the costs would outweigh the benefits in most parks. An argument was made that the parks and outdoor recreation contribute far more to the economy than they cost, so user fees should not be necessary. There was a suggestion to develop fees based on the level of impact and cost incurred in managing the impacts of specific activities, particularly motorized activities.

There was a great deal of confusion about the term incremental costs and a request for clear information about what the incremental and non-incremental costs are now. Similarly there were questions about basic and enhanced infrastructure. There were also questions about crowding costs and how that could be measured and collected.

Some submissions from those who are already paying fees for angling and hunting licences indicated support for non-consumptive user fees and suggested it was about time they shared some of these costs. The few respondents who supported user fees pointed to other jurisdictions (Parks Canada, Alberta, Ontario and in the US) where user fees have proven to be a successful way of supporting the outdoor recreation system. There was a suggestion specific to marine parks: that consideration be given to adopting some of the practices in use on the St. Lawrence in the Seaway/Rideau River system of parks (e.g. season’s pass or day-use-fee for BC boaters for over-night moorage and mooring buoy fees, and a higher out-of-country rate).

Recreation: Non- Incremental Costs Funded Through General Taxation

Again, there was confusion about what “non-incremental” costs included and what the current costs are. Most respondents referring to this element suggested additional sources of revenue to off-set non-incremental costs, e.g. local partnerships, increased fees, commercial operators, and a percentage of the new or increased user fees.

Recreation: Contributions Used to Fund Incremental and Non-incremental Costs of Basic Infrastructure, and Enhanced Levels of Recreation Service Delivery

The combination of terms in this element of the recommendation created confusion. The recommended use of contributions was not supported by most of those who offered comments. The main concerns were opportunity for commercialization of parks (e.g. through exclusive rights for vending and concessions), and off-loading of government's responsibilities. For those who supported the idea, they added the condition that contributions should only be used for enhanced levels of recreation service (e.g. interpretive services, wildlife viewing platforms and blinds).

Recreation: Partners May Fund Enhanced Levels of Recreation Service Delivery

This element was not supported by most of the respondents who raised the subject. There were concerns regarding the nature of the partners and the impacts they would have on parks, particularly commercialisation. It was seen as being most inappropriate in parks, ecological reserves and wildlife management areas, but perhaps on Crown land. It was also suggested that taxpayers support the parks and private commercial entities reap the benefits from profits gained by operating in parks.

Rec. 23: Voluntary Contributions

Green Lottery

The green lottery idea met primarily with opposition but there was also conditional support. The arguments against the green lottery approach included that it was a taxation on the poor, a potential drain from other lottery funds that are funding non-profit organizations now, would involve high external costs, and concern about using a lottery to fund things that government is responsible for and should be funding through taxes.

Some offered conditional support as long as the funds went to a non-government agency that is free from industry and political influences, and that it is re-named to something other than "green" lottery (e.g. "Fish and Wildlife", "Park Stewardship", "nature" or "conservation" lottery).

A few supported the idea and saw the benefits of collecting voluntary funds. They cited the success of a similar program in Oregon and current lotteries run by the BC Lottery Corporation.

Other Voluntary Contributions

The tax refund check-off was seen as a much better idea for raising voluntary funds as it would be a low-cost approach. Some also thought the provincial sales tax idea identified in the draft report deserved more consideration. The idea of a surcharge on recreation equipment (listed but not supported by the panel) was seen by a few as a good source of revenue (as experienced in the US; however, most of those who commented about this matter were strongly opposed. They pointed to the potential for outdoor recreation to become elitist and a further decline in the health and fitness of the

public, making specific reference to the increase in obesity among both adults and youth.

Rec. 24: Non-Consumptive Users' Contributions

Non-Consumptive Users Contribute To The Provision Of Outdoor Recreation Opportunities

The comments were divided on the topic of non-consumptive user contributions, with most being opposed to the idea. Those who were opposed argued that by paying taxes, they already own these areas and access should be free. This was supported by the belief that parks and wilderness benefit both users and non-users. It was also stated that non-consumptive users have such a small impact that they should not be charged fees. Some added that if the non-consumptive users have motorized vehicles, that a fee of some sort would be appropriate to offset the costs and impacts of parking, roads and trails. Some were concerned that fees would reduce overall use of parks and limit access for those with low income. Some stressed the mental and physical health benefits and cost savings that offset the costs imposed by non-consumptive users. Comments also stressed the difficulties and costs associated with administering and enforcing non-consumptive use fees, indicating that it may not result in a net benefit.

Those who supported the idea of non-consumptive use contributions saw this as an opportunity to improve services and facilities and re-instate the interpretive programs. A few indicated that it was about time non-consumptive users made a contribution as hunters and anglers have been paying a disproportionate amount to outdoor recreation and conservation. One condition that appeared frequently was that all contributions are dedicated to parks and outdoor recreation and are not used for basic services.

Rec. 25: Recreation Pass

Recreation Pass for Non-consumptive Personal Use of Crown Land

As in Rec. #4 above, there was strong opposition to the idea of a recreation pass for non-consumptive use of Crown land, for many of the same reasons. The most common arguments against the pass were cost and difficulty of administering and enforcing on Crown land, that use of Crown land for recreation will decline, that this should be tax funded, and that this could result in a decline in tourism and the related decrease in employment and tax revenue. Other comments were that it would be unfair to charge fees for use of Crown land when many of the trails are actually maintained by volunteers, and that this would be particularly unfair to rural and remote communities where Crown land often provides the principle or only opportunity for outdoor recreation. The concern about limiting access for those with low incomes was raised here as well. A few suggested that non-consumptive users would in effect be subsidising consumptive users, specifically hunters and anglers.

There were a few supporters of the recreation pass who mentioned the benefits of increasing funding to enhance fish and wildlife and to improve services (e.g. parking at

trailheads). Some indicated that the revenue from this idea would far exceed the estimates provided by the panel.

Some provided conditional support for a recreation pass as long as payment for passes was voluntary, pass-holders agreed to a broad code of ethics (to improve accountability for actions), all funds went back into parks, discounts were offered to users of BC Parks, passes are linked to hunting and fishing licences, the cost was kept low, and that it was good for five years (to reduce paperwork).

An alternative approach to raising revenue from non-consumptive use of parks and Crown Land was also proposed: implement a mandatory recreation vehicle tax/fee linked to annual the licensing process of recreation trucks, all wheel drive vehicles and motor homes. Fund could be dedicated to maintenance of motorised access to recreation areas.

Park Pass Blended with Outdoor Recreation Pass

Generally, the respondents asked for more detail about the two passes and what they would permit access to. The concept of integration was supported by most who indicated an opinion. There was also a view that hunting and fishing licences should be separate and that a new licence fee be considered for ATVs.

Rec. 26: Trust or Foundation

Trust or Foundation to Support Provision of the Ministry's Conservation and Recreation Responsibilities

Many of the respondents who offered commented on this element indicated their support. They saw the potential for acquiring new protected areas and preserving existing ones and the opportunity to complement existing funding sources for fish, wildlife and parks. One respondent referred to a 2002 survey (Dyck 2002) that showed 73% of BC respondents were in favour of a trust fund for parks. Some cautions were also provided, particularly the potential for funds to be used for government responsibilities and the likelihood of competition with non-profit organizations that are also looking for funds. Other concerns centred on the need for accountability and transparency in order to ensure that the funds are used appropriately. There were questions about the BC Trust for Public Lands and further details on what a trust would accomplish and how.

Rec. 27: Revenue Retention and Allocation

Expand the Purpose and Function of the Habitat Conservation Trust Fund (HCTF)

Many expressed the view that the HCTF should remain intact, with the same name, structure and purpose. It was characterized as a well-regarded and recognized organization with a solid 21-year history. There were concerns that by broadening the mandate, the HCTF would be weakened, particularly in its conservation efforts. There was an overall sense that "it ain't broke – so don't fix it".

There was support for using the HCTF as a model for creating one or more other similar trust funds, particularly for parks.

A few respondents supported the idea of an expanded HCTF based on their regard for the HCTF. Similarly, a few were opposed to any form of trust fund, seeing it as an opportunity for “over-development” and commercial exploitation.

Allocation

There were concerns about how the funds in one or more trust would be allocated, most of which had an underlying concern that conservation activities would be compromised. Submissions stressed that funds should not be used for conservation activities that are the responsibility of government (base budget) and should be funded from general revenue. They also expressed caution that a new larger organization could divert conservation money into paying for additional salaries and ongoing operations.

“The proposed change to the habitat conservation trust fund seems to allocate more funds to salaries and “other expenditures” and less to actual conservation work in the field”.

Other Elements of the Trust Fund

The ability to receive and dedicate contributions was supported by respondents who referred to this element. There were suggestions that funds collected in a watershed or geographic area be used to support conservation activities in that area (e.g. similar to the Grand Canyon Trust). Once again it was stressed that funds should not be diverted into Ministry operations to offset cut backs to general revenue.

There was also strong support for a non-lapsing account, the ability to dedicate incoming revenue to specific purposes and Ministerial authority for allocating funds.

Rec. 28: Expenditure Accountability

There was support for the Minister to retain accountability for expenditures from the Ministry’s voted appropriations and for allocations from a trust fund. A few cautioned against the potential for decisions to be made on purely economic terms.

Pricing Issues

Some respondents offered general comments on pricing that were not specific to the recommendations in this section. The comments addressed camping fees, the tables in the report, how increased revenue from fees would be used, and fee increases for hunters and anglers.

The most common suggestion was that camping fee increases are an acceptable and effective way of increasing revenue as long as the fees are dedicated back to parks. It was argued that the current camping fees in BC are well below the North American average and that there is a willingness among park visitors to pay more. Other

suggestions were that fees should be increased on a park-by-park basis and phased in over several years. Some re-stated their opposition to day-use and non-consumptive use fees.

There were comments about the Table "Potential New Annual User Fee Revenues", particularly that the numbers were arbitrary not substantiated. Others wanted more specific information about how the fee increases, especially the per cent increases in each category, and the actual amount each fee would increase.

There were also concerns expressed about how the increased revenue would be used. Some interpreted the following statement in the panel's draft report to mean that the user fee revenue would be used to pay for conservation rather than recreation. They suggested that this was in conflict with Principle 2, that tax revenues would pay for conservation.

"The movement toward a user-pay system will provide the highest assurance for the maintenance of the Ministry's primary responsibility for conservation and protection of the Province's fish, wildlife and parks."
(Recreation Stewardship Panel's Sept. 15, 2002 Draft Report, p. 38)

Another general viewpoint regarding pricing was that the fee increases for hunting and angling are much greater than those for park users and others who enjoy outdoor recreation. It was also argued that the budget is already balanced on the fish and wildlife management side because of the high fees now being collected.

Rec. 29: Prices Must be Regularly Reviewed and Updated

Respondents generally supported this recommendation. It was seen as an effective approach to ensure that prices respond to market conditions, e.g. that fees are competitive with other jurisdictions, are adjusted on a per-park basis, are reduced if costs of service are less than budgeted, and are reduced if participation levels decline dramatically. It was also suggested that fee increases should be gradual to allow for these adjustments, and that the cost of living index should be considered as a guide.

A small number of respondents did not support this recommendation, some because they disagreed with increases in user fees and others because they saw this as a costly exercise that could open the door for significant fee increases resulting from mismanagement and inflated costs.

Rec. 30: Approval to Expedite Price Adjustments

The Provincial Government's Endorsement Of The Principles Must Include Approval To Expedite The Price Adjustments Necessary To Meet The Ministry's Budget Reduction Targets Scheduled To Take Effect On April 1, 2003

Many of the comments regarding this recommendation expressed concern about rushing forward with the fee increases and indicated that there should be more public dialogue on the subject. Some respondents also suggested that interim funding should be made available to allow for a more gradual increase in fees. Some referred to examples in other jurisdictions where fees were gradually introduced over four to five years and suggested that this would allow time to better understand the economic, environmental and social implications of changes before they are fully implemented.

There was also support for this recommendation from a few respondents who saw the value of generating additional revenue to improve park services and management, and also to meeting the budget reduction.

There were many questions about the scheduled budget reduction targets. For example:

- What are the ministry's budget reduction targets and are they rational and defensible?
- Is the recreation section the only portion of the ministry that needs examination? Is pollution prevention paying its way?
- Why has water licensing been given to L&W B.C. with the loss of income to the ministry that entails?
- Would the parks program shut down if they didn't contribute their fair share?

Initiate Identified Changes to Fees Within its Mandate

There were only a few comments on this aspect of the recommendation and most indicated concerns about raising fees, with some opposing day-use fees and others saying that hunters and anglers are already covering the costs of their programs. There were also concerns that there may be delays in implementing this recommendation.

Rec. 31: Interim Funding

This recommendation for interim funding was supported by most of those commented. Interim funding was seen as essential to allow for successful implementation, particularly given the complexity of the changes required and the broad range of interests that will need to be involved. Some specifically identified the benefits of the recreation pass model, and highlighted the need for interim funding to allow the required coordination to take place.

Public Consultation Process

Public Consultation Process Generally Flawed

Most of the respondents expressed dissatisfaction with the public consultation process for the Recreation Stewardship Panel. Because of the limited timeframe for public response, lack of public notification about the process, web-based consultation methodology, and the restricted nature of the workshops, several of the respondents said that the public process was not open and inclusive and cannot be considered a true public process. A few respondents indicated that a full and open public process should have been part of the panel's mandate. In a few cases, respondents suggested that the consultation process was a sham and was purposefully designed to discourage public input because decisions have already been made.

Lack of Information and Notification

Some of the respondents indicated that because the public received very little information about the panel review process through the media, participation in the public process was significantly diminished. Those that commented on the lack of public information about the process generally agreed that a comprehensive media and advertising campaign should have been conducted. Representatives from stewardship organizations and societies and related interest groups expressed particular disappointment about the lack of information and notification about the public process, suggesting that their input should have been encouraged through direct notification. A few respondents suggested that a print and electronic media campaign to inform the public about the process and educate them about the issues would have been beneficial.

Time Frame Too Short

Several respondents indicated that the one-month time frame for the public consultation process was inadequate. Some respondents suggested that the compressed time frame made meaningful input by the general public unfeasible. A realistic time span should have been allotted to allow individuals and organizations ample opportunity to access the draft report, thoroughly review it and formulate an informed response.

First Nations organizations were particularly concerned about the time frame saying that it did not allow enough time for them to consult with members before important decisions were made about policy changes that would affect them directly. They also referenced legal judgements that direct the provincial government and others to allow enough time to conduct meaningful consultation with First Nations' communities.

Stakeholder Process Exclusive

Some of the respondents expressed dissatisfaction with the province-wide non-government organization process. Respondents suggested that the workshops were exclusionary because only selected provincial stewardship-related groups and organizations were invited to participate. Some of the respondents suggested that other stakeholders such as small conservation organizations, user groups/clubs and community-based organizations should have been included in the stakeholder consultation process.

Lack of Public Meetings

The lack of open meetings or forums specifically for the general public was identified as unacceptable by some of the respondents. Generally, comments about the public meeting process indicated that by not holding any public meetings the views of the general public have not been represented. To provide the opportunity for equitable input, some respondents indicated that open public meetings should be conducted throughout the province. A few submissions recommended public hearings. Some referred to the extensive public meetings held throughout the province during the Park Legacy Project as a better approach. There was also a concern that seniors and people with disabilities were not directly consulted given that the panel's principles would eliminate discounts for those who do not qualify as low income.

Internet-Based Consultation Not Equitable Or Efficient

The emphasis on internet-based public input was considered to be unfair and inequitable by some of the respondents. Respondents suggested that because all members of the public do not have access to the Internet, the consultation process was inherently exclusive. It was noted by a few that other means of accessing or contributing information were not well publicized and difficult. Issues related to the efficiency of the panel website were cited as problematic by a few of the respondents, with a few indicating that they were unable to download the draft report.

Overview of Comments

The overall tenor of the submissions was one of passion for protecting the ecological integrity of parks and the highly valued outdoor recreation experience in British Columbia. In response to the draft report, there was a general reluctance to dramatically change how fish, wildlife and park recreation is managed now, or how it was managed in the past. Respondents made it clear that they want to maintain conservation as the guiding principle in recreation management, support and expand agreements with First Nations, maintain ministerial authority and public accountability, maintain the *Park Act*, maintain the Habitat Conservation Trust Fund, maintain the fish culture program, re-establish education and interpretation programs, re-establish the forest recreation program, and return the organizational structure to one more closely resembling the previous structure. Opposition to the draft report came for new proposals that would change how outdoor recreation is managed, such as introduction of non-consumptive user fees, fees for recreation on crown land, increased commercial services and new private partnerships.

This section provides a broad view of the comments on the panel's draft principles and recommendations. It identifies common themes that received the highest number of responses in the submissions and the general level of support for elements of the draft report. It also identifies other common themes that were not specific to the draft principles or recommendations.

Frequency of Responses

The analysis of input included tracking how many times specific draft principles and recommendations were addressed in the submissions. This frequency count provides a rough indication of the topics to which respondents were most compelled to address. It does not indicate the level of support for elements of the draft report or the level of agreement on the topic among the respondents. Elements of the draft principles and recommendations were grouped to provide an idea of the most frequent themes or topics addressed in the submissions. The following ranking shows the nine topics that clearly stood out as being those most frequently referenced in the submissions.

Highest Frequency Topics (ranked)

1	Funding Model
2	First Nations Rights and Involvement
3	Increased Commercial Activity and Private Partnerships
4	Revenue Retention Model (Trust Fund)
5	Ministerial Authority
6	Panel Process Issues
7	Forest Recreation Programs
8	Interpretation and Education
9	Existing Legislation

By far, the topic that received the most frequent response was the funding model, and in particular the proposed introduction of user fees for non-consumptive use of parks and Crown land. This high response is likely a reflection, in part, of the media attention following release of the draft report, as this tended to focus on user fees. Similarly, the potential for increased commercial activity and partnerships with the private sector was discussed in the media and received a strong response in the input. Many submissions addressed only these two topics and did not provide comments on other aspects of the draft report.

The remaining high frequency comments came from submissions that typically addressed the full range of topics covered in the draft report. Other topics that received a high response rate were the principles and recommendations related to First Nations' rights and involvement in management and delivery of fish, wildlife and park recreation management; dedicating revenue and retaining it in trust; the panel's public process; maintaining the current ministerial authority; continuing the forest recreation programs, re-instating education and interpretive programs; and maintaining the existing legislation.

Level of Support

This section looks more closely at the specific comments to get a sense of the overall level of support for various aspects of the draft report. This was done by gauging the general level of support for each of the components within the 17 principles and 31 recommendations in the panel's draft report. As one would expect, there was a wide range of viewpoints for each component, but in most cases it was possible to get a sense of whether there was general support or opposition. Of course, there were responses to topics that fell somewhere in between support and opposition, particularly where there was confusion over the panel's intention, differences of opinion or a lack of strong feelings either way. These were considered to be neutral or mixed responses overall.

Approximately half of all the components in the draft report were generally supported in the submissions, one quarter were generally opposed and one quarter fell somewhere in between with mixed or neutral responses.

The following summary identifies elements of the draft report that were generally supported and those that were generally opposed. This focuses on the most commonly referenced themes underlying the draft principles and recommendations and does not address each individual principle and recommendation.

Common Elements That Were Generally Supported

Rights and Involvement of First Nations

The elements receiving the most widespread support in the submissions were those related to First Nations rights and involvement in the management and delivery of fish and wildlife and park recreation services. Ideas such as supporting existing and new agreements, participation on advisory boards and working jointly to protect culturally significant values were some of the opportunities that were strongly supported.

Conservation and Protection as The Foundation For Recreation

The principles and the conditions placed on recommendations highlighting the importance of conservation and protection were very strongly supported. Conservation and protection, biodiversity, and ecological integrity were seen by many as the primary reason for setting aside parks and protected areas and as the very foundation for recreation. They wanted to ensure that the panel's first principle is implemented in such a way that recreation does not compromise conservation and protection. Linked to this conservation value was the overwhelming support for re-instating education and interpretation programs for parks, fish and wildlife viewing. Most saw these programs as the foundation for building a conservation ethic among children and adults.

Public Accountability

There was support for the principles and recommendations that were seen to provide clear accountability to the public. The current system of ministerial authority and accountability was strongly supported; there was little appetite for delegation of authority to an arm's length organization. Linked to this was support for maintaining the existing legislative requirements and constraints, particularly the Park Act, and ministerial authority to allocate funds. The recommendations pointing toward improved public involvement through a variety of mechanisms, including provincial and regional advisory bodies, were also supported, although with some cautions. There was also support for creating an organizational structure that would allow better coordination among those responsible for various aspects of outdoor recreation and conservation.

Continuation of Forest Recreation Sites, Trails and Roads

There was strong support for re-instating a program to manage forest recreation sites, trails and access roads. This was seen as having a clear social, health and economic benefits, particularly for rural areas. Many recommended that management of these forest recreation resources be transferred from the Ministry of Forests to a new organization responsible for all aspects of outdoor recreation.

Dedicated Fees Held in Trust

While the implementation of new and increased user fees were generally opposed, there was support, if fees had to be implemented, for the revenues generated from these fees to be retained in trust and dedicated back to the programs from which they came (i.e. parks, fish and wildlife). Many submissions indicated support for the current

Habitat Conservation Trust Fund and suggested that this be retained in its present form and used as a model for a similar trust fund for parks and outdoor recreation.

Common Elements That Were Generally Opposed

Funding Model- User Fees and Allocation

The elements receiving the most widespread opposition were those related to the funding model, particularly new fees and a recreation pass for non-consumptive users. There was a great deal of confusion with terminology resulting in uncertainty about what services would require fees. On the whole there was opposition to paying fees for low impact activities such as walking, hiking, biking, wildlife viewing, swimming and picnicking. Use of parks and Crown land for these activities was seen as a fundamental right already paid for through taxes. Some were concerned that fees might reduce outdoor recreational activity among British Columbians and visiting tourists, resulting in reduced economic, social and health benefits. It was also argued that the economic spin-offs from parks far exceed the cost of maintaining parks. There was some willingness to pay new fees for parking and use of motorized vehicles that were seen to create more of an impact and therefore result in increased maintenance costs.

There was also confusion and opposition to the way the funding model distinguished between what would be funded by government versus user fees, with the common view being that government should pay for all of conservation and most of recreation. There was concern that over time, the burden of funding government responsibilities would shift more and more to users.

Increased Commercial Activity and Private Partnerships

Another flash point arose wherever the panel suggested increased commercial activity, intensive revenue-focused locations or expanded partnerships with the private sector. Many spoke about the risks of losing public control over the management and ownership of parks, of compromising conservation and protection values, and losing the distinctive non-commercial wilderness appeal of provincial parks and protected areas.

Other Common Themes

Three other common themes emerged throughout the submissions: the lack of clarity in the draft report, lack of economic data and analysis in the draft report, and lack of meaningful public consultation throughout the panel process. While there was input on topics related to fish, wildlife and parks recreation that went beyond the mandate of the panel, this input has not been included in this report.

Clarity in the Draft Report

There were numerous comments that the draft report was too vague, left room for too much interpretation and used terms that people were not comfortable with or did not understand. This was most pronounced in the sections dealing with funding where terms such as incremental and non-incremental costs, crowding costs, basic and enhanced infrastructure caused a great deal of confusion. This led to confusion about

which costs would be covered by government, through general revenue, and which costs would be covered by user fees. There was also confusion about recommendations and options related to delegation of authority and organizational structure and references to other programs that people were not familiar with.

Economic Data

There was a number of requests for more detailed data on current costs and revenue related to outdoor recreation and for economic analysis to justify the conclusions and recommendations put forward by the panel. It was also suggested that the panel provide additional information on historical budgets so the reader could clearly see the magnitude of budget cuts over the past several years. As well, there were requests for details about the costs related to implementing some of the panel's recommendations and the potential for increased revenue generation stemming from some of the recommendations.

Public Process

While not an element of the panel's draft report, the panel did invite comment on the public process. The comments criticized the process for being rushed, involving only province-wide stakeholders (and not local and regional groups) in meetings and workshops with the panel, not holding public meetings throughout the province, inadequate awareness of the panel and process among the public and over-reliance on the internet for public input and information.

Terms of Reference for the Recreation Stewardship Review

I. Background

The recreation services provided by the Ministry of Water, Land and Air Protection – services in BC Parks, hunting, fishing and wildlife viewing opportunities, and the provincial freshwater hatchery program – are deeply valued by BC residents and a drawing card for visitors from around the world.

Government is committed to improving the delivery of this world-class recreational experience in a way that is financially sustainable and creates benefits for everyone involved – local communities, tourism operators, First Nations and the public at large.

Government is also committed to balance the provincial budget by fiscal year 2004/2005. The three-year service plan for the Ministry of Water, Land and Air Protection, published in February, indicates that “fewer ministry staff and funds will be directed to providing camping and recreational services such as hunting and angling opportunities (including stocking of lakes and rivers) where recreational use is low or costs cannot be recovered (cost recovery will be largely dependent on the management and funding model adopted for parks, and hunting and angling).”

To that end, the Minister of Water, Land and Air Protection has appointed an expert panel to review these services and recommend improved management models and funding sources.

II. Requirements and Responsibilities of the Panel

The three-year service plan for the Ministry of Water, Land and Air Protection calls for the development of “a new management model for park and wildlife recreation that connects fees with services and opportunities and allows greater public involvement in decision making.”

To guide the government’s review, the Minister of Water, Land and Air Protection has appointed a five-member panel with expertise in the areas of stewardship, recreation and management. The panel will make recommendations to government on improvements to the management model and funding sources for the recreation services delivered by the Ministry of Water, Land and Air Protection. Accordingly, the panel is required to carry out the following responsibilities:

APPENDIX A

- The panel will limit the scope of their work to management and resourcing issues facing parks, fish and wildlife recreation programs and work within the scope of previous decisions made in the Core Review, Service Plan and Budget processes.
- The panel will identify and evaluate options for funding, service delivery and public involvement in ongoing delivery of park, fish and wildlife recreation opportunities.
- The panel will investigate and examine the policy and management framework that exists in other leading jurisdictions. This will include reviewing such concepts as the establishment of a supporting foundation or trust and the creation of a governing or advisory authority or board.
- The panel will consult with British Columbians on the options they develop.
- The panel will submit final written recommendations to the Minister no later than November 29, 2002.

III. Review Process

The review process will occur in two phases.

Phase 1

During phase 1 the panel will work with Ministry of Water, Land and Air Protection staff to confirm the principles established in the Core Review, Service Plan and Budget processes.

The panel will then develop, assess and recommend policy options based on these principles.

The panel, in partnership with staff from the Ministry of Water, Land and Air Protection will develop a consultation model and process during this time period.

This consultation model will be completed and announced no later than July 1, 2002.

Phase 2

During phase 2 the panel will undertake targeted consultations with key stakeholders and accept written submissions from the public in response to the policy options developed during phase one.

The panel will submit draft recommendations to the Minister of Water, Land and Air Protection by September 13, 2002, which will be released for public discussion and feedback, resulting in final recommendations by November 29, 2002.

Implementation actions will be initiated in 2003 and completed by the end of 2004.



Public Consultation Plan

Objective

The objective of the public consultation plan is to provide the opportunity for province-wide groups, First Nations and the public to review and comment on policy options and draft recommendations developed by the Recreation Stewardship Panel.

The mandate for carrying out this process comes from the panel's terms of reference.

Range of Participants

The terms of reference direct the panel to undertake targeted consultations with key province-wide groups, First Nations and the public.

Representatives of the First Nations Summit are assisting the panel with the design and coordination of a process to involve First Nations. The panel will also invite participation of those First Nations not affiliated with the First Nations Summit.

The panel will use press releases and a web-site to invite the public to participate in the process. As well, most of the province-wide groups involved in the process have mailing lists and electronic listserves that will assist in communicating opportunities for their members and colleagues to participate in the panel process. The panel web-site allows participants to sign up on a distribution list that will be used to circulate panel materials and a survey.

Consultation Format

Written Submissions

The panel will welcome written submissions related to its mandate throughout the process. Submissions received by October 15, 2002, will be incorporated into the analysis and summary of public input to be considered by the panel in preparing its recommendations.

Wherever possible, the panel would appreciate receiving written submissions in electronic format (e.g. via e-mail messages or MS Word attachments). The contact options are listed at the end of this plan.



Preliminary Consultation

In addition to the direction given in the panel's mandate, the panel invited key province-wide groups with an interest in fish, wildlife and protected area recreation to participate in informal sessions with the panel to discuss the panel's terms of reference and some issues that were being considered by the panel in developing a set of working principles.

The sessions were held at Simon Fraser University, Harbour Centre on June 25 and 26. Notes of the sessions will be posted on the panel web-site.

Discussion of Options

The panel will develop and assess policy options based on its terms of reference and its working principles. A discussion paper outlining the options will be posted on the web-site, and written submissions responding to the paper will be accepted.

The panel will also host a workshop bringing together First Nations and key province-wide groups to discuss the options on the evening of August 22 and all day August 23, 2002. A summary of the workshop discussions will be prepared and made available to participants and the public.

The written submissions and workshop discussion on options will assist the panel in developing draft recommendations.

Review of Draft Recommendations

The panel will submit a set of draft recommendations to the Minister of Water, Land and Air Protection on September 16, 2002. This report will also be distributed to First Nations, province-wide groups and the public for review and comment. Distribution of the draft recommendations will take place through the web-site, e-mail and mail, along with comment forms that can be filled out directly on the web-site or mailed/faxed back to the panel. Written submissions regarding the draft recommendations will also be accepted.

The panel will use press releases and network distribution via the key province-wide groups to invite the public to participate in the review of the draft recommendations.

A report will be prepared summarizing the consultation process and input received. This will be available to the public and posted on the web-site.

Final Report

The final report of the panel will be submitted to the Minister of Water, Land and Air Protection on November 29, 2002. The report will subsequently be made public.



Summary of Key Steps (2002)

This process and schedule is subject to change.

Preliminary Discussions

Convene province-wide group meetings	June 25 and 26
Release summary of province-wide group meetings	July/August

Options

Release discussion paper on options	August
Convene options workshop	August 22 and 23
Release workshop report	September

Draft Recommendations

Submit Draft Recommendations to Minister and public	September 16
Deadline for input (surveys and written submissions)	October 15

Final Report

Release report on public input	November 29
Submit Final Report to Minister	November 29

Contact Information (until Nov. 29, 2002)

Recreation Stewardship Panel
c/o Praxis Pacific
3848 St. Georges Ave.
North Vancouver, BC V7N 1W5

Tel: (604) 980-8250
Toll-free: 1-877-882-1284
Fax: (604) 980-9992

E-mail: RecPanel@praxis.ca

Web-site: <http://wlapwww.gov.bc.ca/esd/recpanel/recpanel.htm>



RECREATION STEWARDSHIP PANEL

Comment Form

For Responses to the Panel's Draft Report

The Panel released a Draft Report on Sept. 15, 2002. This comment form asks for your thoughts on the main topics addressed in the report.

- Completed forms **received by October 15, 2002** will be included in the analysis of public input and considered by the panel in preparing their final report.
- While this is not a statistically valid random survey, it will provide valuable insight to the panel.
- If you need more space, please add extra paper. Written submissions are also welcome.

Comment Forms can be submitted in the following ways:

On-line at: www.praxis.ca/recpanel
 Fax-back to: (604) 980-9992
 Mail back to: 3848 St. Georges Ave. N. Van., BC, V7N 1W5

Principles

Please provide your comments and suggestions regarding the panel's principles.

Recommendations

Please provide your comments and suggestions on the panel's recommendations under the following main headings:

Governance

Please Turn Over!



Page 2

Management _____

Funding _____

Pricing _____

Process

Please provide your comments on the panel process and the public process.

To join the mailing list, please provide the following:

Name: _____

Street address: _____

Community / Province: _____

Postal Code: _____ E-mail: _____

Thank you for your time and thoughts!