

Jan 11/17

From: Nickel Plate Nordic Centre

To: Citizen Engagement

Re: Professional Reliance in Natural Resources

NPNC appreciates the opportunity to provide input into the review of the Qualified Professional model of resource management in B.C.

Please accept the following as our submission:

By way of background, Nickel Plate Nordic is a non profit society established in 1989 and is responsible for operating a first class Nordic Centre near the City of Penticton. We manage approximately 50 km of groomed nordic ski trails. The club has a growing membership of over 800 and receives approximately 3,000 day visitors each year as well. Nickel Plate plays a strong educational role in the community with a large school program and hosts First Nations initiatives including the Spirit North Program. NPNC operates on crown land under a Partnership Agreement with Recreation Sites and Trails, part of the Ministry of Forests, Lands and Natural Resources. Under the partnership agreement, Nickel Plate is required to maintain smooth, safe groomed trails.

Groomed nordic ski trails are packed and track set by a grooming machine. The tracks set are parallel grooves approximately 5 cm deep that guide the skis for classic nordic skiing. Most of NPNC's trails are bordered by timber which provides a barrier to wind. Without this barrier wind causes snow to be blown into the ski tracks making them unusable. Further, harvesting opens access by snowmobiles. Those NPNC trails that have had adjacent timber harvested are impacted by snowmobiles using the groomed trails for sledding and crossing the trails. Snowmobile tracks both parallel to and crossing the groomed trails, ruin the grooming. More importantly, they create a significant safety risk. If a skier is going downhill on a groomed trail and suddenly hits a rut caused by a snowmobile they risk falling at speed. A serious leg injury on a trail several kilometers from the lodge and in the middle of winter can be life threatening due to cold exposure. This aside from any direct injuries sustained. If the timber is left in place it protects the trails from snowmobile access.

Recently NPNC has been actively engaged with the Ministry of Forests, Lands and Natural Resources Operations (FLNRO) as well as 3 logging companies that have identified cut blocks that they wish to harvest within NPNC's agreement area. Discussions have been cordial and the logging companies have listened to NPNC's concerns about harvesting. At the end of the day, however, the timber remains identified as harvestable timber.

If the timber adjacent to the ski trails is logged, as is proposed, the trails become unusable due to wind blown snow filling in the ski tracks set by the grooming machine. This would mean that the Nordic Centre would no longer be viable.

While there is an economic value to harvesting the timber, NPNC believes that it would be an economic gain only once every 50 or so years. NP Nordic is at 6,000 ft. elevation so growth is slow and the timber that is harvested generally tends to be thin, short & twisted. Any economic benefit from harvesting should be more than offset by other economic gains. NP Nordic has **annual** expenses of \$194,000 and income of \$215,000 (from year end March, 2017). It is a non profit so all income is returned to the community in one form or another. This is, of course, in

addition to the social benefits of having an excellent Nordic Centre for the use of the residents of the South Okanagan as well as winter visitors to the area.

That was kind of a long winded background piece, however, we feel it is necessary that the reader understand the context of our comments on the QP model.

On the home page of your website the comment is made " professionals hired by proponents decide how those objectives or results will be met. "

On the surface, this gives the appearance of a conflict of interest. This doesn't mean that we are questioning the ethics of the professional foresters hired by the logging companies. It just causes us to be concerned that there needs to be significant oversight of the recommendations of the QP if the stakeholders such as NPNC are to have confidence in the process. In our discussions with FLNRO we were left with the impression that there is not a lot of oversight. It sounded to us like any proposal for harvesting would be approved in the absence of some obvious error. In our view a more comprehensive review of any proposed harvesting is needed if FLNRO is going to rely on QPs hired by logging companies. For example an analysis of the relative economic and social benefits of harvesting vs the viable operation of a Nordic Centre. In addition, there are environmental issues such as altered habitat and damaged wildlife corridors. Clearly there will be flora and fauna species that will be negatively affected by logging activities. In addition NPNC is in an Intensive Recreation Area that attracts both locals and visitors to the Apex/NPNC corridor. Extensive harvesting in the area negatively impacts on the outdoor recreation opportunities in the area. Because the QPs are hired by the logging companies we believe that FLNRO should do a comprehensive analysis of all of these factors before issuing any cutting permits.

NPNC has requested from FLNRO an estimate of the economic value of the timber in NPNC's agreement area, however, we have not yet received a response. While we recognize the economic importance logging in the province, we question how much economic value the timber has in the NPNC agreement area. Accordingly we have suggested that FLNRO examine other harvesting opportunities for the affected logging companies that would offset any economic loss resulting from protecting the NPNC timber. We have not yet received a response to this suggestion.

None of this is intended to disrespect the logging companies involved or their professional foresters or to minimize their importance in the process. The logging companies have, in fact, been quite cooperative in delaying harvesting in NPNC's agreement area. They have, instead, been focusing operations in other areas. They cannot, however, be expected to delay harvesting in NPNC's agreement area indefinitely if it remains in the harvestable timber supply and we expect that they are close to exhausting other viable alternatives.

In summary, the current QP model does not, in our view, give confidence that an objective and rigorous evaluation of all factors is being undertaken.

The following quotes are from a Dec/2017 Forest Practices Board special report and we feel they summarize the situation well. This report is also referenced in a Nov. 27/2017 review of the QP model which is available at: https://www.wcel.org/blog/problem-relying-too-much-upon-professionals?utm_source=LEB

"In recent years, the Forest Practices Board has seen situations arise where forestry development was putting local environmental and community values at risk, yet district managers could do little to affect the development and protect the public interest. The Board has also encountered situations where conflicts between resource-users could have been avoided if district managers had the authority to intervene to ensure operations would meet local management objectives and respect tenured interests."

"Recommendation

In accordance with section 131(3) of the Forest and Range Practices Act, the Board recommends that government introduce a regulation to implement Forest Act section 81.1. The regulation should authorize district managers to refuse a cutting permit or road permit if the minister determines that any of the following applies:

- there is clearly significant risk to public health or safety;
- there is clearly significant risk to forest resources or values;
- there is likely to be a contravention of legislation; or
- the interests of another tenure holder have not been adequately addressed (if that tenure holder requests district manager intervention)."

For further information please do not hesitate to contact the undersigned.

Rick Leslie
VP Nickel Plate Nordic
778-515-6577