



BC Parks Public Notification and Engagement Permit Policy Summary of Public Comment

Introduction

BC Parks is part of the Ministry of Environment and Climate Change Strategy and is responsible for the designation, management and conservation of a system of ecological reserves, provincial parks, conservancies and recreation areas located throughout the province. British Columbia's parks and protected areas contain nationally and internationally significant natural and cultural features and outdoor experiences.

BC Parks is modernizing the way that it informs the public about permits that are issued to authorize activities in parks, protected areas, recreation areas, conservancies, and ecological reserves. BC Parks intends to provide greater transparency on decisions that are made to issue permits by providing information online in an accessible format.

Amendments to the *Park Act* were passed under Bill 25, the [*Miscellaneous Statutes Amendment Act, 2012*](#), which allowed for more flexibility in how the public is informed about proposed permits, and giving the minister the ability to require that the public be provided with an opportunity to review details and provide comment on a proposed permit. These amendments have not been brought into force, as BC Parks is first developing a Public Notification and Engagement Permit Policy (draft posted below.)

This report summarizes public comments received by BC Parks on the draft Public Notification and Engagement Permit Policy, and describes how the comments informed the final draft of the policy, including how sections of the policy were changed.

BC Parks Public Notification and Engagement Policy was approved on December 11, 2017 and can be found on the BC Parks website at <http://www.env.gov.bc.ca/bcparks/permits/consultation/public-notifications-policy.html>

Background to the review and comment process

A draft policy document was posted on the BC Park's website (<http://www.env.gov.bc.ca/bcparks/permits/consultation/public-notifications-policy.html>) on March 23, 2016. The draft policy set out proposed guidance and direction on providing information to the public on proposed and issued park use permits, and circumstances where public comment would be solicited prior to a decision. A response form was provided on the website for submission of public comments on the draft policy.

All responses submitted to BC Parks through the online comment form during the review and comment period (March 23 to June 22, 2016) were compiled and analyzed to determine recommendations for policy updates.

Summary of Public Comments

There were 16 comments received overall on the draft policy, including 10 comments from individuals and 6 comments from the following non-profit groups and associations:

- Canadian Parks and Wilderness Society (CPAWS);
- Kootenay Mountaineering Club (KMC);
- British Columbia Wildlife Federation (BCWF);
- Federation of Mountain Clubs of British Columbia (FMCBC);
- Outdoor Recreation Council (ORC); and
- Friends of Cypress Provincial Park Society (FCPP).

Submissions from these non-profit groups and associations have been included as appendices to this document for reference. Comments addressing specific areas of the policy are listed below in table format for ease of reference.

General Themes

Comments received have been broken down by policy areas and common topics. General themes that arose in the comments are:

- Development of the policy process
- Stronger commitments in policy language
- Making the website as user friendly as possible
- Collaboration and coordination across government
- Method/media for advertisement
- Distribution through existing interest groups via list serves
- Use of traditional (non-electronic) media
- Links to other BC Parks' policies such as Impact Assessments, Management Planning, and the Fixed Roof Accommodation Policy
- What permits should be advertised
- Length of time for posting
- When to seek comment on applications
- What information is posted

Comments and Changes on the Draft Policy

1. Development of the policy

Two comments were received on the policy development process, requesting either an opportunity for further comments or major revisions to the existing document.

Sample of Respondent Comments:

“Given the nature of the Councils comments above, as well as other comments made by some of our member organizations, we strongly recommend that a fresh draft be prepared to take these comments into account and be circulated again for comment.” – ORC

“While we support BC Parks’ plan to create a policy that will inform and engage the public on the issuance of Park Use Permits, we respectfully suggest that much more work needs to be done on this draft to make it a meaningful and effective document.” - FCPP

Response:

BC Parks intends to use the feedback received during this review and comment process to update the draft policy in response to the comments received. We hope to be able to revise the policy so that the policy goal can be achieved of informing the public on park use permit applications and decisions.

2. Stronger commitments in policy language

Strengthening the language used in the policy was recommended in several comments. These comments recommended using language that is both strong and clear to avoid misinterpretation or inconsistent application.

Sample of Respondent Comments:

“This paragraph [page 2, para.5] is concerning as it leads us to the political arena resulting from lack of clarity and open wording such as “when” and “may” require public comment, how information on a proposed permit will be made available, and how comments will be considered in the decision making process.” – BCWF

“While it is good that BC Parks is developing a policy for public notification and engagement, we feel it is too weak, and it makes the application process too easy, with no guaranteed public involvement, for potentially controversial developments such as commercial accommodation, privatized facilities, pipelines, or revisions to park boundaries to accommodate industry.” – KMC

“However, a closer review of these statements makes us unsure of the effectiveness of the draft policy in providing opportunities for meaningful public involvement. Numerous statements in the draft use the word “should” instead of “will”. An example is 1.2 *Information Sharing*: “BC Parks shares information on active permits and should provide notice to the public where a permit is intended to be issued.” We would have more confidence in the purpose of the proposed policy if the words **shall** or **will** were used instead of **should**.” – FCPP

Response:

The purpose of any policy is to provide direction to staff that they are expected to consider and follow. The language in the policy should always be clear enough that the intended direction is understood by any person who reads the policy, and interpreted in consideration of the stated intent of the policy. BC Parks has changed the language that is used throughout the policy so that it is clear that staff are expected to follow the policy direction.

3. Making the website as user-friendly as possible

Several comments were received that suggested ways to make the use of a website for posting information as user friendly as possible. These suggestions included many good design principles, such as having the website be easy to find, and have information on the site be easy to find for various user groups.

Sample of Respondent Comments:

“The Council is pleased that information on active PUPs is available. We note, however, that the address of the website is not a direct derivative of the BC Government or BC Parks website addresses. We were able to locate it by using the search function on the BC Parks website but we suggest that navigation to this website should be made more intuitive, perhaps by including a clearly labelled direct link from the BC Parks website. We also found the search function in the Active PUPs webpages to be inadequate because it does not appear to be possible to search by Park or by Permit Holder. We note the reference to a publically available website and recommend that this information be placed on the BC Parks website in a similar way to the posting of Draft Management Plans. The public will not necessarily become aware of this information if it is posted on some other website.” – ORC

“Will the publicly available website notification system used to increase public awareness of permit applications be set up to allow efficient public review of applications in specific locations?” – FCPP

Response:

BC Parks hopes that the website will be used by the public to access information on permits and appreciates suggestions for how to make the website easier to find. We will investigate how to improve website features such as search functionality so that groups can find information on specific applications, parks, or areas of the province.

4. Collaboration and coordination across government

Two comments were received on coordinating the posting of this type of information across the provincial government.

Sample of Respondent Comments:

“If a proponent is applying for both a Park Act permit and a Land Act tenure, it would be great if gov't could collaborate and ensure that the applicant only does public advertising once. Doing it more than once could be costly, waste time, and cause confusion.” – individual (permittee)

“There should be a website where people can go to look up all public notifications.” – individual

Response:

Coordination with other provincial government agencies on notifications and advertisement of permits is in line with the overall goals of the provincial Natural Resource Permitting Project. BC Parks will continue to work with other Natural Resource ministries through provincial projects to try to create ways for the public to access information more easily and centrally.

5. Method/media for advertisement

There were differing opinions received on the best method or media to use to advertise park use permits. Many commenters supported a move to electronic media such as websites or social media, while others favoured an approach that would see traditional non-electronic means of advertisement (posting of signs, newspaper advertisements) coupled with electronic postings.

Sample of Respondent Comments:

“Social media has become one of the main sources of information gathering by people today. A vast majority of people under 40 have facebook and twitter accounts and use it to learn about current events. I suggest that BC Parks should create a facebook and/or twitter account to not only promote BC's Provincial Parks, Ecological Reserves, and etc but also use social media as a way to inform the public on the issuing of permits. I've seen Parks Canada use social media as a platform to not only promote attractions and events but also keep the public up to date on any changes going on within the National Parks.” – individual

“However, we also strongly believe that where it is determined that a permit application requires public input prior to a decision being made, public notification of the permit application and the opportunity for public consultation should not be limited to regional or local areas. Provincial parks, protected areas, conservancies, ecological reserves and recreation areas are for the benefit of the public generally and the tools or methods used to give the public the opportunity to comment should be province wide, particularly when the proposed location of the activity is of broad general public interest (i.e., not limited to local communities or regional interest).” – FMCBC

“A good idea to have online posting.” – individual

“I feel that in both the Notification and Engagement Sections the public should have access to the information by:

1. as you say ... Publicly Available Website, 2. Displayed on billboard at Park entrances, 3. On individual Park websites e.g. <http://www.env.gov.bc.ca/bcparks/explore/parkpgs/sasquatch/> as Visitor Notices are done now. Attention Visitors - Important Notice!

This way a citizen who dearly loves a specific Park will have the most opportunity to see what may occur and what is occurring within his Park.” – individual

“BC Parks should host a public meeting or open house and be available to answer questions and gather public reaction. The PUP applicant should also be present.” – individual

“The Council agrees with the proposal that advertising in traditional media be used when open houses are proposed.” – ORC

“The opportunity for public review should parallel other similar provincial/municipal government

policies such as land applications. The application fee should cover the cost of BC Parks to place info in the media, post application notices on site and conduct the evaluation including public input.” - individual

Response:

BC Parks has a Facebook account that it uses to promote and connect with the public on the provincial parks system, as well as a blog to communicate about volunteer activities and general camping information. Social media has become a common way to disseminate information to a wide audience, but for permit decisions a more secure and formal platform is recommended.

The use of websites to advertise park use permits hopes to address the issue of advertisements in traditional media being geographically limited in scope. BC Parks recognizes that public interest in park management is not necessarily related to the physical proximity of a park. It is hoped that using an online platform will allow any person, regardless of location, to stay informed on permit decisions in the provincial parks system.

The policy proposes an approach where our standard media for advertisement will be through a website, but proposes using other media and methods where an application will meet the criteria for public input. BC Parks considers various factors, such as potential impact of a proposed activity (under the Impact Assessment Policy) and costs to the applicant, when determining whether to use additional methods of advertisement such as open houses, posting of signs, etc.

6. Distribution through existing interest groups via list serves

Many commenters felt that use of a website would only be truly functional if users could be notified when new items were posted. The most popular suggestion was for a list-serve to be created and have emails sent to users.

Sample of Respondent Comments:

“Consider using key groups to distribute applications for comment. For recreation, the Outdoor Recreation Council of BC is the logical one for recreation and perhaps CPAWS or the Sierra Club of BC for conservation/ecological comments.” – individual

“We also recommend that a form of referral process, similar to that for Crown Land tenure applications be adopted for significant applications.” – ORC

“If you are wanting to engage the public then develop a strategy that will work for both BC Parks and the public. Either provide the public with an opportunity to be added to a distribution list and receive every application or have a monthly listing of all application on the same day of each month so that the public knows when to look at the website. A monthly list could provide a listing both geographically by regions and by type of permit use (research, recreation, filming, or changes to existing land use activities). If a distribution list is established for Park Use Applications, then everyone on that list should receive a notification of Opportunity for Input as well as known interest groups and relevant management planning participants.” – CPAWS

“Users should have the ability to subscribe to be notified of new notices by e-mail.” – individual

“When considering an application for a park use permit or a park management plan, the notices should go out to all areas of the province and to all conservation NGOs that have an interest in parks. This requires a master list of organizations and contacts to receive this information by email or hard copies. The reason for this requirement is that in the past Parks predominantly requested regional/area input on issues such as management plans.” – BCWF

“We suggest that stakeholders with specific interest in a defined area should be notified directly by email about any permit application in that area, e.g. Friends of Cypress Provincial Park Society should be notified directly about any permit application for use of Cypress Provincial Park.” – FCPP

“Any relevant stakeholders and user groups should also be contacted individually and provided with details (e.g. Friends of <Park>, outdoor clubs, biking clubs; snowmobile associations).” – individual

Response:

Use of technology to keep interested parties informed through notifications, rather than placing the onus on stakeholders to check for updates, would help to achieve the goals of the policy. Rather than using a list-serve to send emails there are other options such as RSS feeds that could be used to automate notifications for those who wish to receive them. BC Parks will investigate the addition of these functionalities to improve the user experience.

7. Links to other policies

Some comments were received questioning how the draft policy was connected to or supported other BC Parks’ policies. The three policies that were mentioned were park management plans, BC Parks’ Impact Assessment Policy and Procedures, and the Fixed Roof Accommodation Policy.

a. Management Planning

Comments were received on the importance of keeping park management plans up to date, and how these policies can be used to support decisions.

Sample of Respondent Comments:

“There is an overarching need to ensure that any activities that occur within a Protected Area do not threaten the values for which it was created and/or is managed to protect. Unfortunately, management plans for most BC Parks/ PAs are very outdated or completely non-existent, due to years of lack of funding. Management plans MUST be in place and up to date in order for this policy to have any meaning, and to have a sense of what values could be impacted. Furthermore, these management plans should enable BC Parks staff to quickly deny permits for activities that are clearly incompatible with maintaining the values that the Protected Area was created to protect. This will decrease the burden of consultation on the public, and free up BC Parks’ staff time. The burden of proof must be on the applicant, to show that the activity in question will not harm the identified value.” – CPAWS

Response:

BC Parks considers all relevant policy when assessing and making decisions on park use permit applications. Management Plans are important policy documents to formally set direction for how a particular park, protected area, conservancy or recreation area will be managed. In cases where management plans are not yet in place or are older documents, other available information is used to make decisions on whether proposed activities will maintain the values in that area, such as: land use planning decisions; the type of park (Class A park, protected area, conservancy, etc.); pre-existing uses; results of an impact assessment; etc.

As a standard part of the application process, BC Parks encourages applicants to discuss their proposal with the Area Supervisor responsible for the park prior to submitting an application, and to read the Management Plan (if available). Applicants can then understand what the values are in the park and what they should consider when putting together an application.

b. Impact Assessments

Providing a greater connection to, and additional transparency on, BC Parks' Impact Assessment Policy and Procedures was suggested.

Sample of Respondent Comments:

"Information on whether BC Parks will be requiring an Impact Assessment, and to what level, should also be provided. The proposed wording in this policy states:

Where this policy identifies that a Level 2 or 3 Impact Assessment is warranted, BC Parks may determine that public input is required prior to making a decision on an application.(page 3)

The wording should be changed to comply with the wording in the existing (and approved) BC Parks Impact Assessment Policy regarding Public Participation:

As a minimum, for all actions that reach Level 3 of the process (Full Impact Assessment Report) there will be notification and an appropriate comment period.(page 17)"

- CPAWS

Response:

BC Parks Impact Assessment Policy and Procedures have been in place since 1999 and are used to help protect the natural and recreational values in the provincial parks system. If a permit application requires a Level 2 or 3 Impacts Assessment, or if a Level 2 or 3 Impact Assessment related to the activity was conducted as part of a park management plan amendment or boundary adjustment proposal, this can be noted in the advertisement.

Making sure that various policies do not contradict one another is important, and the wording in the draft policy has been updated to confirm that requirements for public consultation will be consistent with what is set out in the Impact Assessment Policy.

c. Fixed Roof Accommodation Policy

There were concerns expressed with the mention of the Fixed Roof Accommodation Policy in the draft policy document, as the policy was felt to be supportive of commercial development in parks.

Sample of Respondent Comments:

"It is notice that twice in the draft document the "The Fixed Roof Accommodation for BC Parks" is mentioned. We had hoped that we had heard the last of that legislation that should be repealed!! After the last attempt I am sure that if that policy resurfaced public groups would create an information campaign as before which led to the failure of the government initiative. It was a combination of the campaign and the failure in the market that sealed the fate of that proposal. We do not support commercial development in our parks and this position is supported by the BC public. When as a panellist on the BC Park Legacy Project we handed our final report to the minister in 1999 we included in the preamble to our vision statement *British Columbians are strongly in favour of environmental protection for the protected area system. They want assurances that natural value in parks will be protected and that **our parks will not become commercialized or privatized in an effort to generate revenue.***" – BCWF

Response:

The Fixed Roof Accommodation Policy was approved in 2006 and remains in effect. The purpose of this policy is to allow timely, clear and transparent management of new, expanded or improved fixed-roof accommodation opportunities in provincial parks. Management principles, application requirements, and criteria for evaluating applications are set out in this policy. This policy is referenced because it sets requirements for public consultation where management plans would need to be amended or are not in place, or where consultation is required under an Impact Assessment. The Public Notification and Engagement Policy references the Fixed Roof Accommodation Policy to support these existing public consultation requirements.

8. What permits should be advertised

Comments on what permits should be advertised, and why some permits might be excluded were received. One comment was specifically concerned with advertisement for Park Operator permits.

Sample of Respondent Comments:

"The policy should apply to all applications." – individual

"We understand the rationale for not including Park Operator Agreements in this Draft policy but we recommend that in cases where the area or facilities to be operated under such an agreement are to be expanded the Policy should apply." – ORC

Response:

The Public Notification and Engagement Policy was restricted in scope to not include Park Operator Agreements because these agreements are already subject to a public competitive process and are advertised online on BC Bid. Advertisement for other permits, such as film permits, may not be possible

due to the short time allowed to make a decision on the permit application. BC Parks follows the [Provincial Film Location Policy](#) and attempts to process all film permit applications within five business days, which does not allow enough time for posting of advertisements. Major film shoots were mentioned in the draft policy as there can be situations where advertisement of a long-term film shoot should be required.

9. Length of time for posting

Many commenters expressed the desire for a longer period for notifications to be posted, stating that ten days would not be long enough. The proposed 10 day time frame was felt to be particularly unreasonable if there was no mechanism to notify the public of advertisements being posted. There may have been some confusion with the intent of the draft policy between posting information to inform the public (section 1.2 where a 10 day period is proposed) versus posting information on permits where comments are being sought (section 1.3).

Sample of Respondent Comments:

“10 days is too short a comment/review period. 20 to 30 is more reasonable.” – individual

“Under 1.2.2 Notification of Permit Applications The period of time (10 days) under which draft permits are posted is too short. 30 days would be reasonable.” – individual

“Regardless of which method is used, the proposal that PUP applications be posted for 10 days only is ridiculous. Even with referrals to specific organizations this type of information takes time to be disseminated through the organization, especially in the case of NGOs, and it takes even longer to develop a response. Some responses may depend on consideration by a committee which may meet only once a month. We suggest that 30 days be the absolute minimum response period, with a longer period for the more significant applications.” – ORC

“The notice period must be adequate to be meaningful. While 10 days, as presently proposed, may be sufficient for short-term use permits of one day or a couple of weeks at most, a period of 10 days is wholly inadequate for longer-term use permits. The notice period should be commensurate with the proposed duration of the permit. The proposed 10-day notification period is impossible short and impracticable for volunteer organizations, such as the FMCBC, to have sufficient time to review, consult their membership and respond appropriately. A minimum of 30 days and preferably longer for extended use permits is necessary in order for public notification of a permit application to be meaningful; otherwise, the public notification serves no useful purpose.” – FMCBC

“Posting park use permits applications on line for 10 days and then removing them, is going to create a high level of frustration with the public unless there is a systematic manner of either posting the information or receiving an email notification of the posting. The application should remain posted on the website until a final decision is made and then a notation should be added that the application was either denied or approved.

A minimum period of three weeks should be provided for input on Park Use Permits Applications with a Level 2 Impact Assessment, and a minimum of five weeks for Park Use Permit Applications with a Level 3 Impact Assessment Report.” – CPAWS

“10 days is an excessively short period of time to provide notice and that should be extended.” – individual

“We have issue with the time line as for many NGO’s it takes considerable time for information to be considered and respond to where required. Many NGO’s are supported by volunteers and depending on the season, work commitments... may not be able to respond as a result of the time constraints.” – BCWF

“We suggest that the period for which applications are posted on a web site should be at least 30 days. (10 days is ‘blink and you miss it’ for volunteer groups like us.)” – KMC

“The 10-day online posting period suggested for the permit applications is not long enough. The time period should be at least 30 days to allow meaningful public review. Further, we recommend that the time period for review should be related to the length of the permit application. A permit application for a one-day event clearly does not require the same review time as a 60-year permit application.” – FCPP

“PUP information should be posted online for 30 days, not just 10.” – individual

Response:

Section 1.2 of the draft policy proposes to share information on proposed and issued permits with the public as a standard to keep the public informed about activities within the provincial parks system. The intent of these postings is to notify the public of new permits that are proposed to be issued, and not to seek comment to be used when making a decision on a permit. The policy was updated to have 10 days be the minimum posting time for a notification, and to have notifications remain posted until a decision has been made on the application. This represents a significant improvement over advertisements posted in newspapers for a single day.

For those situations where there will be a formal opportunity for comment on a permit application, as set out in section 1.3 of the draft policy (‘Engagement’), it is recognized that the time frame will need to be sufficient for meaningful responses to be submitted. The suggestion of having the length of the comment period tied to the level of Impact Assessment that is undertaken, or to the length of term of the permit, are good suggestions and have been incorporated into the draft policy. A minimum time frame of 30 days for a comment period has also been added.

10. When to seek comment on applications

Feedback on when public comment should be sought on permit applications was mixed. Some commenters felt that all permit applications should be open to comment, others thought the criteria in section 1.3 should be clearer, or put in place where the application would trigger impact assessments or result in restricting public access.

Sample of Respondent Comments:

“The draft policy suggests that public consultation might occur when an assessment (I assume by Parks staff...?) identifies information gaps. As an applicant, I would hope that -- if there is a gap in information -- you would contact the applicant first to bridge that gap. Public consultation would -- I suggest -- then

only be necessary when that missing information cannot be supplied by the applicant but would be available from the public. An example might be the nature/degree/scope of public use in an area.” – individual (permittee)

“Public input should take place before decisions are made on permits. There is no point otherwise.” – individual

“Sub-paras 1.1.1 and 1.3.1 – Public consultation: These paragraphs indicate that the public will be provided with an opportunity to review applications, be consulted and provide comments by exception rather than as a general rule. We do not consider that meets the stated intention of the policy. By way of contrast, Crown Land Tenure applications administered by FrontCounter BC are almost invariably put out for referral to the “publics” which are most likely to have an interest in them and those publics are generally invited to comment. Those types of Crown Land applications may range from a proposed trail or recreation site to fixed roof accommodation. We suggest that BC’s Provincial Parks merit a policy which is at least as rigorous as Crown Lands.” – ORC

“It is imperative that the public has the opportunity to review and provide comments on application before a park use or resource use permit is issued, particularly if the permit will impact carrying capacity, restrict or impact public use or access in any way, or will allow the permit holder to limit use or access in any way.

We believe that there must be public consultation for what are described in the draft Policy as “exceptional cases”, i.e., permit applications for development of an accommodation facility or investigative use research or where assessment of an application identifies information gaps. Not only should what constitutes an “exceptional case” be clearly set out but also the criteria that will guide the Minister or BC Parks in determining whether public consultation should be undertaken. If not, the reason for a public notification of a permit application is undermined. Furthermore, if issuance of a permit may result in restrictions on or may impact public use or access, or may allow the permit holder to limit use or access in any way, public consultation should be required. Decisions relating to use permits within provincial parks, protected areas, conservancies, ecological reserves and recreation areas should be transparent, beginning with giving adequate and consistent public notification of any substantive permit applications.” – FMCBC

“As a minimum, for all actions that reach Level 3 of the process (Full Impact Assessment Report) there will be notification and an appropriate comment period.(page 17)

If BC Parks truly wants to provide a transparent Park Use Permit process to the public, all Level 2 (Detail Screen Impact Assessment) and Level 3 (Full Impact Assessment Report) should also be posted and made available to the public.” – CPAWS

“Input from the public should be welcomed, encouraged and collected during the notification period for all permit applications.” – individual

“Also we suggest that a public consultation process initiated by BC Parks should be REQUIRED for major developments (not ‘may’ or ‘consider’, which is open to ministerial discretion, and doesn’t really commit BC Parks to do anything).” – KMC

“In regard to decisions on when to engage the public, the word “criteria” is used both in the statement on *Purpose* (page 1) and in *Policy* (page 2), but inadequate information is provided on these criteria, and

in our view, numerous limiting words are used that undermine the transparency of the process. See 1.3 *Engagement* and subsections that follow for frequent use of such words and phrases as “**should**”, “**may**”, and “**will consider**.” – FCPP

Response:

BC Parks considers all policy when making a decision on a park use permit, including management plan direction, which itself considers public input. Public input into the decision making process may be warranted where there are potential impacts or unknown impacts. BC Parks intends to increase transparency on the Impact Assessment Policy and Procedures, particularly for high risk projects that require opportunities for public engagement. BC Parks is exploring how to make information related to the decision making process more publicly available.

11. What information is posted

The draft policy proposed to provide specific information on proposed and active permits, and suggestions were received on what additional information should be included.

a. Active permits

Comments on the type of information that will be provided on active (already issued) permits indicated that additional information would help to improve the site. Providing the entire permit document in addition to the high-level information on the permit was mentioned by several commenters, as well as additional information (fees, exclusivity, better activity descriptors, etc.) were also suggested.

Sample of Respondent Comments:

“We are pleased that active permits and relevant information relating to these permits will be available on line until the permit has expired or is canceled. However, we believe that the complete permit should be available for public view on the BC Parks website for the duration of the permit, not just the information proposed on the draft policy. Any obligations, responsibilities or duties of the permit holder should be fully disclosed to the public, as well as any ability for the permit holder to restrict or limit, directly or indirectly, public use or access to the provincial parks, protected areas, conservancies, ecological reserves and recreation areas.” – FMCBC

“Under 1.2.1 Information on Active Permits I would add the complete permit should be posted online and not just a summary. The complete information should remain online for the duration the permit is active.” – individual

“It is good to see a public listing of all existing Park Use Permits within Protected Areas on the web. It would also be helpful if another column could be included that would provide a one word descriptor in terms of what type of recreation (river rafting, kayaking, nature tours, etc.), research (species, ecosystem or feature) or filming (educational, commercial) is occurring.” – CPAWS

“Re Section 1.2.1 - Information on Active Permits The information that is provided should include the entire permit. There is no reason to hide information from the public by only

providing snippets of information such as a "summary of activities authorized under the permit."

Failing that level of disclosure, there are two additional pieces of information that must be added to the list:

- A) Some Park Use Permits give the permit holder the authority to limit the ability of members of the public to access areas within a park that are covered by the permit. Any information regarding the authority of the permit holder to take actions against members of the public must be available online in its entirety.
- B) Many Park Use Permits involve a payment from the permit holder to the BC Government. The details of this financial arrangement must be made available online.”
– individual

Response:

It is BC Parks’ intent to have information remain online for as long as permits are active. The contents of permit documents must be checked to ensure that personal or proprietary information is not posted online, as BC Parks is subject to the *Freedom of Information and Privacy Protection Act*. Current technology and data does not enable posting of permit documents, but where no personal or proprietary information is contained in a permit document making these documents easily accessible makes sense, and BC Parks will investigate updates to the technology to enable the posting of permit documents online. No park use permit provides the right to quiet enjoyment, and restriction of public access may only be allowed for safety reasons or to protect the private improvements of the permit holder.

b. Permit applications

For permit applications information on the impact assessment required and the application form should be posted. BC Parks staff should be able to comment on applications and have that publically posted.

Sample of Respondent Comments:

“All relevant information about the permit, including where the permit information can be found, if not on the BC Parks website, and the proposed duration of the permit should be disclosed.

We agree that where it is determined that an opportunity for public review and comment is required, the minimum standard should be that all relevant information (i.e., name of person/company applying, proposed location of the activity (name of park(s), area of province), requested length of term of the permit, proposed activities and whether the application is new, a renewal or an amendment of an existing activity), along with the closing date and address for submission of comments should be easily accessible through links on the BC Parks website.” – FMCBC

“Information on whether BC Parks will be requiring an Impact Assessment, and to what level, should also be provided....The Level 2 and/or Level 3 Impact Assessment Reports provide valuable information and should also be made available to the public if input is requested.” –

CPAWS

"Re Section 1.2.2. - Notification of Permit Activities- The information that is posted on the website should also include the permit application in its entirety." – individual

"BC Parks staff should be able to comment freely on the potential impact of any PUP. Their views should be posted online." – individual

Response:

Permit applications may contain personal or proprietary information that cannot be released to the public. BC Parks will investigate the feasibility of posting these documents online given available technology. BC Parks intends to increase transparency on Impact Assessments that are conducted and is investigating how to make information related to the decision making process publicly available.

The BC Public Service Code of Conduct must be followed by all provincial employees, but provided no proprietary or confidential information is used, any staff member may comment as an individual on any permit application that is open for public comment. Advice to the statutory decision maker on whether a permit should be approved or denied is considered confidential and cannot be shared.

Appendix A - Federation of Mountain Clubs of British Columbia



Federation of Mountain Clubs of BC

Accessing the backcountry one step at a time

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June 22, 2016

Megan Beveridge

Authorizations Policy Analyst

BC Parks

Ministry of Environment

Dear Ms. Beveridge,

Re: Draft Policy for Public Notification and Engagement on Permits under the Park Act and Ecological Reserve Act

Thank you for the opportunity to comment on the draft Policy for Public Notification and Engagement on Permits under the *Park Act* and *Ecological Reserve Act*.

Our organization, the Federation of Mountain Clubs of BC (FMCBC), is a non-profit umbrella organization of 37 non-motorized outdoor recreation clubs with over 5000 individual members. For over forty years, the FMCBC has been representing the interests of our members and the general public that engage in non-motorized outdoor recreation. One of our mandates is to maintain and enhance natural and peaceful wilderness experiences in the backcountry, as well as in parks. This requires protecting the backcountry, particularly backcountry within parks, from incursions of motorized recreational activities and commercial development.

Below are our particular concerns or comments relating to the draft Policy:

- 1) We are pleased that active permits and relevant information relating to these permits will be available on line until the permit has expired or is canceled. However, we believe that the complete permit should be available for public view on the BC Parks website for the duration of the permit, not just the information proposed in the draft policy. Any obligations, responsibilities or duties of the permit holder should be fully disclosed to the public, as well as any ability for the permit holder to restrict or limit, directly or indirectly, public use or access to the provincial parks, protected areas, conservancies, ecological reserves and recreation areas.
- 2) It is imperative that the public has the opportunity to review and provide comments on applications before a park use or resource use permit is issued, particularly if the permit will impact carrying capacity, restrict or impact public use or access in any way, or will allow the permit holder to limit use or access in any way. All relevant information about the permit, including where the permit information can be found, if not on the BC Parks website, and the proposed duration of the permit should be disclosed. The notice period must be adequate to be meaningful. While 10 days, as presently proposed, may be sufficient for short-term use permits of one day or a couple of weeks at most, a period of 10 days is wholly inadequate for longer-term use permits. The notice period should be commensurate with the proposed duration of the permit. The proposed 10-day


notification period is impossibly short and impracticable for volunteer organizations, such as the FMCBC, to have sufficient time to review, consult their membership and respond appropriately. A minimum of 30 days and preferably longer for extended use permits is necessary in order for public notification of a permit application to be meaningful; otherwise, the public notification serves no useful purpose.

- 3) We believe that there must be public consultation for what are described in the draft Policy as "exceptional cases", i.e., permit applications for development of an accommodation facility or investigative use research or where assessment of an application identifies information gaps. Not only should what constitutes an "exceptional case" be clearly set out but also the criteria that will guide the Minister or BC Parks in determining whether public consultation should be undertaken. If not, the reason for public notification of a permit application is undermined. Furthermore, if issuance of a permit may result in restrictions on or may impact public use or access, or may allow the permit holder to limit use or access in any way, public consultation should be required. Decisions relating to use permits within provincial parks, protected areas, conservancies, ecological reserves and recreation areas should be transparent, beginning with giving adequate and consistent public notification of any substantive permit applications.
- 4) We agree that where it is determined that an opportunity for public review and comment is required, the minimum standard should be that all relevant information (i.e., name of person/company applying, proposed location of the activity (name of park(s), area of province), requested length of term of the permit, proposed activities and whether the application is new, a renewal or an amendment of an existing activity), along with the closing date and address for submission of comments should be easily accessible through links on the BC Parks website. However, we also strongly believe that where it is determined that a permit application requires public input prior to a decision being made, public notification of the permit application and the opportunity for public consultation should not be limited to regional or local areas. Provincial parks, protected areas, conservancies, ecological reserves and recreation areas are for the benefit of the public generally and the tools or methods used to give the public the opportunity to comment should be province wide, particularly when the proposed location of the activity is of broad general public interest (i.e., not limited to local communities or regional interest).

We have had the benefit of reviewing the comments that were submitted by Peter Wood, Director of CPAWS, BC Chapter, and the FMCBC fully supports and agrees with those submissions.

In summary, our main concerns relate to the proposed short time frame for public notification of permit applications, the potential for the public not to receive notice about some significant permit applications, and the potential for the public notification and consultation to be limited and not reflective of province-wide or broad general public interest in an area.

Yours sincerely,



Monika Bittel, Co-chair of SWBC Recreation & Conservation Committee
Federation of Mountain Clubs of BC

Appendix B – Canadian Parks and Wilderness Society



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Comments on Park Use Permits Public Notification and Engagement Policy (BC Parks)

June 21, 2016

General comments

This initiative to increase the transparency of the Park Use Permitting process within Protected Areas is welcome.

There is an overarching need to ensure that any activities that occur within a Protected Area do not threaten the values for which it was created and/or is managed to protect. Unfortunately, management plans for most BC Parks/ PAs are very outdated, inadequate or completely non-existent, due to years of lack of funding. Management plans MUST be in place and up to date in order for this policy to have any meaning, and to have a sense of what values could be impacted. Furthermore, these management plans should enable BC Parks staff to quickly deny permits for activities that are clearly incompatible with maintaining the values that the Protected Area was created to protect. This will decrease the burden of consultation on the public, and free up BC Parks' staff time. The burden of proof must be on the applicant, to show that the activity in question will not harm the identified value.

It is good to see a public listing of all existing Park Use Permits within Protected Areas on the web. It would also be helpful if another column could be included that would provide a one word descriptor in terms of what type of recreation (river rafting, kayaking, nature tours, etc.), research (species, ecosystem or feature) or filming (educational, commercial) is occurring.

Public Notification and Engagement

1.2.2 Notification of Permit Applications

Posting park use permits applications on line for 10 days and then removing them, is going to create a high level of frustration with the public unless there is a systematic manner of either posting the information or receiving an email notification of the posting. The application should remain posted on the website until a final decision is made and then a notation should be added that the application was either denied or approved.

If you are wanting to engage the public then develop a strategy that will work for both BC Parks and the public. Either provide the public with an opportunity to be added to a distribution list and receive every application or have a monthly listing of all application on the same day of each month so that the public knows when to look at the website. A monthly list could provide a listing both geographically by regions and by type of permit use (research, recreation, filming, or changes to existing land use activities).

Information on whether BC Parks will be requiring an Impact Assessment, and to what level, should also be provided.

1.3.1.1 BC Parks Impact Assessment Policy

The proposed wording in this policy states:

Where this policy identifies that a Level 2 or 3 Impact Assessment is warranted, BC Parks may determine that public input is required prior to making a decision on an application. (page 3)

The wording should be changed to comply with the wording in the existing (and approved) BC Parks Impact Assessment Policy regarding Public Participation:

As a minimum, for all actions that reach Level 3 of the process (Full Impact Assessment Report) there will be notification and an appropriate comment period. (page 17)

If BC Parks truly wants to provide a transparent Park Use Permit process to the public, all Level 2 (Detail Screen Impact Assessment) and Level 3 (Full Impact Assessment Report) should also be posted and made available to the public.

1.3.1.2 Notification of Opportunity for Input

If a distribution list is established for Park Use Applications, then everyone on that list should receive a notification of Opportunity for Input as well as known interest groups and relevant management planning participants. The Level 2 and/or Level 3 Impact Assessment Reports provide valuable information and should also be made available to the public if input is requested.

A minimum period of three weeks should be provided for input on Park Use Permits Applications with a Level 2 Impact Assessment, and a minimum of five weeks for Park Use Permit Applications with a Level 3 Impact Assessment Report.

Thank you for the opportunity to provide comments on this policy.

Peter Wood
Director of Terrestrial Conservation
CPAWS-BC

Appendix C - Kootenay Mountaineering Club

Below is the result of your feedback form. It was submitted by
() on 2016 06 20, at 21:08:26

FullName: Kootenay Mountaineering Club

Comments: While it is good that BC Parks is developing a policy for public notification and engagement, we feel it is too weak, and it makes the application process too easy, with no guaranteed public involvement, for potentially controversial developments such as commercial accommodation, privatized facilities, pipelines, or revisions to park boundaries to accommodate industry.

We suggest that the period for which applications are posted on a web site should be at least 30 days. (10 days is a blink and you miss it for volunteer groups like us.) Also we suggest that a public consultation process initiated by BC Parks should be REQUIRED for major developments (not a may or a consider, which is open to ministerial discretion, and doesn't really commit BC Parks to do anything).

Appendix D – Outdoor Recreation Council



Outdoor Recreation Council of British Columbia

1101 – 207 West Hastings Street, Vancouver BC V6B 1H7
Tel: 604-873-5546 E-mail: outdoorrec@orc.bc.ca

June 22, 2016

Megan Beveridge
Authorizations Policy Analyst
BC Parks
Ministry of Environment

By e-mail to Megan.Beveridge@gov.bc.ca

Dear Megan

Re: Draft Policy for public notification and engagement on Park Use Permits (PUPs) under the Park Act and the Ecological Reserve Act

Thank you for the opportunity to comment on the Draft Policy for Public Notification and Engagement on Park Use Permits under the *Park Act* and the *Ecological Reserve Act*.

One of the principal purposes of the Outdoor Recreation Council (the Council) is to represent the interests of the outdoor recreation community and to advocate for and facilitate access to public lands and waters for outdoor recreation. The Council's core membership consists of 20 organizations representing most of the principal outdoor recreation activities enjoyed in this province. Another 30 member organizations represent local and regional interests in similar activities and among those are the "Friends" of some specific Provincial Parks. The Council therefore attaches great importance to issues affecting BC's Provincial Parks.

Overall comment on the Draft Policy

The Council welcomes this initial attempt to set out a policy for public engagement when BC Parks is considering the issue of PUPs and we are pleased to note that BC Parks is committed to informing the public about permit applications and active permits. However, from our experience with the procedures for granting Crown Land Tenures by the Ministry of Forests, Lands and Natural Resource Operations, we do not consider this Draft Policy adequately reflects BC Parks stated commitment. Some specific comments are as follows:

Scope

We understand the rationale for not including Park Operator Agreements in this Draft policy but we recommend that in cases where the area or facilities to be operated under such an agreement are to be expanded the Policy should apply.

Sub-paras 1.1.1 and 1.3.1 – Public consultation: These paragraphs indicate that the public will be provided with an opportunity to review applications, be consulted and provide comments by exception rather than as a general rule. We do not consider that meets the stated intention of the policy. By way of contrast, Crown Land Tenure applications administered by FrontCounter BC are almost invariably put out for referral to the "publics" which are most likely to have an interest in them and those publics are generally invited to comment. Those types of Crown Land applications

may range from a proposed trail or recreation site to fixed roof accommodation. We suggest that BC's Provincial Parks merit a policy which is at least as rigorous as Crown Lands.

Subpara 1.2.1 – Information on Active Permits: The Council is pleased that information on active PUPs is available. We note, however, that the address of the website is not a direct derivative of the BC Government or BC Parks website addresses. We were able to locate it by using the search function on the BC Parks website but we suggest that navigation to this website should be made more intuitive, perhaps by including a clearly labelled direct link from the BC Parks website. We also found the search function in the Active PUPs webpages to be inadequate because it does not appear to be possible to search by Park or by Permit Holder.

Subpara 1.2.2 Notification of Permit Applications: We note the reference to a publically available website and recommend that this information be placed on the BC Parks website in a similar way to the posting of Draft Management Plans. The public will not necessarily become aware of this information if it is posted on some other website. We also recommend that a form of referral process, similar to that for Crown Land tenure applications be adopted for significant applications. Regardless of which method is used, the proposal that PUP applications be posted for 10 days only is ridiculous. Even with referrals to specific organizations this type of information takes time to be disseminated through the organization, especially in the case of NGOs, and it takes even longer to develop a response. Some responses may depend on consideration by a committee which may meet only once a month. We suggest that 30 days be the absolute minimum response period, with a longer period for the more significant applications.

Subpara 1.3.1.2 Notification of opportunity for input: The Council agrees with the proposal that advertising in traditional media be used when open houses are proposed.

Summary

Given the nature of the Council's comments above, as well as other comments made by some of our member organizations, we strongly recommend that a fresh draft be prepared to take these comments into account and be circulated again for comment.

Yours sincerely

Jeremy McCall
Executive Director

Appendix E – BC Wildlife Federation

Comments on BC Park use permits draft Policy proposal. June 12, 2016

The BCWF appreciates the opportunity to provide input towards the BC Parks use permit proposal, providing the following comments for consideration.

Although input is being sought we express concern towards a lack of transparency that was promised when your government came to power. In many cases it is felt that the consultation process has become an exercise of providing the perception of public consultation in the development of policy, believing a final outcome has been predetermined by government, influenced by industrial and commercial interests.

The impacts on BC's Park System have been brought forward in legislation with little or in most case no prior public knowledge or consultation. It started with Bill 84, a bill that contained amendments affecting the boundaries of some Provincial Parks, including giving oil company the right permission to build a road through Graham Laurier in the North for exploration beyond the Park. As was reported at the time, this Park was established from the Fort St John LRMP table which included a route around the Park.

Then in 2010 the government passed the BC Park Boundary Adjustment Policy. While this was of concern it was felt that under the Park Act any proposal for industrial use could be addressed. In 2005 the BC Supreme Court in a judgment, prevented the minister from allowing the relocation of a road through Grohman Narrows Provincial Park to accommodate a developer. We also won the issue of building a road through Columbia Park using the Park Act.

This all changed with the passing of Bill 4, The BC Park Amendment Act 2014.

Bill 4 allows for industry and others to carry out research in BC Parks without "Research" being defined in the legislation. While this government describes what might be allowed, vegetation sampling and fish surveys, it does not say what could be allowed.

We suspect that industrial and or commercial proponents will define this open interpretation to their benefit, not public or BC Parks, arguing it to be inclusive of road building, perhaps drilling to accommodate the oil and gas industry, and even pipe or transmission lines.

A Letter to minister Polack with this question remains unanswered, suspecting proposals to impact or change five Provincial protected area boundaries by Kinder Morgan, requesting to build their pipeline from Edmonton Alberta to Burnaby that may have used the BC Park Amendment Act.

We are certain that no company would consider research for any of these activities without the knowledge that they would be allowed to proceed if their research indicated it was the way to go for

them. Consider the proposal for the Prosperity mine, to do research relating to an environmental Assessment they dug 59 + test pits. This supports that even research exploration can have a devastating impact on the wilderness of a provincial Park, or protected area.

Page Paragraph 1

Can we get Existing Park use permits and conditions?

Page 1 Paragraph 2

Once again we see mention of “resource” use permits
Can you define what “Resource use” could include?
Would it normally be allowed under the present Park Act?

Page 2Paragraph 4

If Ecological Reserves are to be considered with parks we point out that they have special significance to protect a landscape features or representative Ecosystem.

If BC Parks is responsible for decisions on Ecological reserves, industrial research must not be considered.

Page 2 Paragraph 5

This paragraph is concerning as it leads us to the political arena resulting from lack of clarity and open wording such as “when” and “may” require public comment, how information on a proposed permit will be made available, and how comments will be considered in the decision making process.

Page 3 Paragraph 1

This will work as long as consultation has taken place before a decision is made.

Page 3 Paragraph 2

This will enable people to get information on where we are on issued resource use permits.

Page 3 Paragraph 3

This is fine but once again we read “Research activities”. On major film activities we recommend that the permit covers cleanup of the area used. We did in the past have an incident where a mess was left and the company had to come back to clean up.

Page 3 Paragraph 4

Fine (see below) ***

Page 3 Paragraph 5

We have issue with the time line as for many NGO's it takes considerable time for information to be considered and respond to where required. Many NGO's are supported by volunteers and depending on the season, work commitments... may not be able to respond as a result of the time constraints. Further comments provided below.

Page 3 Paragraph 6

We do not believe that Parks or Government will succeed in a rehash of The Fixed Roof accommodation Policy, it was a failure before and those groups that came together on the issue a still active.

The BCWF does not support the promotion of commercialization of BC parks as is the believe intent of the Fixed Roof accommodation policy proposal.

Page 3 Paragraph 7

See above

When considering an application for a park use permit or a park management plan, the notices should go out to all areas of the province and to all conservation NGOs that have an interest in parks.

This requires a master list of organizations and contacts to receive this information by email or hard copies. The reason for this requirement is that in the past Parks predominantly requested regional/area input on issues such as management plans.

I had a conversation on this issue with Keith Baric on the management plan for Mt Robson Provincial Park, requesting that a meeting to be held in the lower Mainland or Victoria, pointing out that these Parks were the property of all British Columbians, not just the residents of the region where the park was located.

The BCWF represents member and resident public interests that are actively involved and utilize our revered Parks throughout the Province. If not a meeting with the public, then perhaps a meeting with designated NGO groups such as ours with an interest in BC Parks.

It is notice that twice in the draft document the “The Fixed Roof Accommodation for BC Parks” is mentioned. We had hoped that we had heard the last of that legislation that should be repealed!! After the last attempt I am sure that if that policy resurfaced public groups would create an information campaign as before which led to the failure of the government initiative. It was a combination of the campaign and the failure in the market that sealed the fate of that proposal. We do not support commercial development in our parks and this position is supported by the BC public. When as a panellist on the BC Park Legacy Project we handed our final report to the minister in 1999 we included in the preamble to our vision statement

British Columbians are strongly in favour of environmental protection for the protected area system.

*They want assurances that natural value in parks will be protected and that **our parks will not become commercialized or privatized in an effort to generate revenue.***

Again and again the biggest concern we heard from public during those meetings was the fear that our parks would be threatened by commercialization. Based on this information the panel drafted the number one guiding principle that followed our vision statement in the final report.

“Protected areas are maintained in perpetuity as public lands. As an inalienable public good, these areas must not be sold, commercialized or privatized”.

This is what the people said, and what the Legacy Panel recommended to government.

Ed Mankelow chair

Parks & wilderness Land Use Committee

Appendix F – Friends of Cypress Provincial Park



Friends of Cypress Provincial Park Society

P.O. Box 91053, West Vancouver BC V7V 2G2

www.cypresspark.ca

To: Ms. Megan Beveridge
Authorizations Policy Analyst
BC Parks, Ministry of Environment
Megan.Beveridge@gov.bc.ca

20 June 2016

by email

Draft Public Notification and Engagement Policy for Park Use Permits Friends of Cypress Provincial Park Society Comments

Friends of Cypress Provincial Park Society (FCPP) appreciated receiving on 23 March 2016 the *Draft Policy for Public Notification and Engagement on Permits under the Park Act and Ecological Reserve Act*. The issuance of Park Use Permits for Cypress Provincial Park is of particular interest to us.

- We note on Page 1 of the draft policy that “The purpose of this policy is to set direction on how BC Parks will inform the public of permits that have been issued within provincial parks . . . and to provide criteria on when the public will be engaged prior to making a decision on a permit application.” Several other statements in the draft Policy suggest opportunities for meaningful public involvement in review of Park Use Permit issuance.
- However, a closer review of these statements makes us unsure of the effectiveness of the draft policy in providing opportunities for meaningful public involvement. Numerous statements in the draft use the word “should” instead of “will.” An example is 1.2. *Information Sharing*: “BC Parks shares information on active permits and **should** (emphasis added) provide notice to the public where a permit is intended to be issued.” We would have more confidence in the purpose of the proposed policy if the words **shall** or **will** were used instead of **should**.
- Re 1.1.2 *Notification of Permit Applications*: Will the publicly available website notification system used to increase public awareness of permit applications be set up to allow efficient public review of applications in specific locations? The 10-day online posting period suggested for the permit applications is not long enough. The time period should be at least 30 days to allow meaningful public review. Further, we recommend that the time period for review should be related to the length of the permit application. A permit application for a one-day event clearly does not require the same review time as a 60-year permit application. We suggest that stakeholders with specific interest in a defined area should be notified directly by email about any permit application in that area, e.g. Friends of Cypress Provincial Park Society should be notified directly about any permit application for use of Cypress Provincial Park.
- In regard to decisions on when to engage the public, the word “criteria” is used both in the statement on *Purpose* (page 1) and in *Policy* (page 2), but inadequate information is provided on these criteria, and in our view, numerous limiting words are used that

undermine the transparency of the process. See *1.3 Engagement* and subsections that follow for frequent use of such words and phrases as “should”, “may”, and “will consider”.

Some specific examples:

1.3.1 Public Consultation

“BC Parks **will consider** undertaking public consultation on a proposed permit application in exceptional cases . . .” In our view, “exceptional cases” should always require public input. A long-term permit, such as a 60-year permit for a ski area, should certainly require public input.

1.3.1.2 Notification of Opportunity for Input

“Where it is determined that an opportunity for public review and comment should be required . . . BC Parks **should** seek to inform the public . . .” We consider this vague wording. Why not “BC Parks **shall** inform the public . . .”?

- The points made above are only a few of the concerns we have about the draft Policy. While we support BC Parks’ plan to create a policy that will inform and engage the public on the issuance of Park Use Permits, we respectfully suggest that much more work needs to be done on this draft to make it a meaningful and effective document.

Sincerely,



Lyn Grants, President
Friends of Cypress Provincial Park Society

cc: Ms. Jennie Aikman, Regional Director, South Coast Region, BC Parks, Ministry of Environment
Mr. Larry Syroishko, Area Supervisor, Vancouver Area, BC Parks, Ministry of Environment
Mr. Brian Wood, Federation of Mountain Clubs of BC
Mr. Jeremy McCall, Outdoor Recreation Council of BC
Ms. Bev Ramey, BC Nature
Mr. Peter Wood, Canadian Parks and Wilderness Society – BC