

## **British Columbia Snowmobile Federation**

PO Box 277, Keremeos, BC V0X 1N0
P: 250.499.5117 | F: 250.499.2103 | TF: 877.537.8716
office@bcsf.org | www.bcsf.org | www.LetsRideBC.com

August 31, 2020

Lyle Saigeon
Director of Strategic Initiatives
Ministry of Forests Lands, Natural Resource Operations and Rural Development
#401-333 Victoria St.,
Nelson BC, V1L 4K3

Via Email: lyle.saigeon@gov.bc.ca

Re: Elk Valley Cumulative Effects Management Framework (CEMF) Project and areas of concern to the Snowmobile Sector

Dear Mr Saigeon,

Thank you for the call last week to discuss the Elk Valley CEMF Project and areas of concern for our Member Snowmobile Clubs in the Region. We appreciate the opportunity to be heard and that the project has agreed to postpone work on the Ptolemy Trail and the Heart Break Trail while we work together to find solutions this winter. We had no assurance on our Loop Trail H120 and hope that this will also be held until those discussions can be completed. We also appreciate the apology we received from you regarding work happening outside of the Access Management Areas (AMA) and your acknowledgement that you were misinformed and this project will have an impact on legal snowmobile access.

As requested, we are including our written response for project work that is of concern to the snowmobile sector:

- H120 is part of an important loop snowmobile trail used by families in the area and as such we are requesting that this trail be removed from the workplan.
- H-127 Ptolemy Trail is an important connector trail to legal motorized trails in the Castle Park. It is a historical trail used for over a 100 years to connect Corbin to Crowsnet and at one time down to Montana through the Upper Flathead.
- H131 and H79-H84 beyond is the Heart Break Trail and leads to Heart Break Ridge as well as legal snowmobile access into the Upper Flat Head.
- The issue of Land Access restrictions after the project is complete came up several times with my clubs while compiling this letter. To meet the deadline of August 31, 2020 provided to us I was not able to investigate this matter and get an answer therefore we have included here as an area of concern for us. In none of the documents provided nor in our meeting was there any discussion about the intent for the management of the land after the restoration work was complete. In our meeting Meghan made the statement that some of this work is intended to address non-compliance by motorized users. But we were not provided any info on whether this is for existing

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areas managed under the AMA's or new AMA's that this project has the intent of creating. So if you could please answer back to us whether there is an intent to create new AMA motorized closures with, or to support, this project?

From the list of priority watersheds shared by Meghan after our meeting it is clear that many of our key snowmobile areas were listed. Therefore, it is imperative that we have a strong working relationship with this project going forward. We believe that connecting the snowmobile clubs in the region to your working group will allow us to find solutions together and we appreciate your offer to allow a representative from our sector on your working group. In order for us to find that representative could you please forward to me the Terms of Reference for the group, minutes of meetings for the last year, meeting frequency, time expectations and current work plans so I can work on our side to find the ideal candidate to put forward.

We also hope that all affected stakeholders and the public have the opportunity to participate in the review of proposed project work going forward. As discussed, Meghan did a limited Stakeholder consultation but does refer to this as a public consultation. The public did not receive any of these maps, they have no information about the project, and there is no way for them to submit their comments. This needs to be addressed as we move forward into other project areas. While we can help the CEMF Project Team update its list of recreation stakeholders we do not feel that sending one email to a limited number of stakeholders can be deemed a public consultation or that one email is adequate to be considered consultation.

From our sector going forward we expect that all roads proposed for restoration will include a description of what that restoration looks like, the land access designation after the work is complete (will it be legally closed to snowmobiles), clear print maps or preferably links to google earth GPX files of proposed work areas, include whether it is a known recreation access trail (summer or winter), your intended outcomes and timelines for when we must submit comments. This will help our volunteers to clearly understand what you are consulting on, whether there are ways we can support the project, and also be better able to provide comments back to the project. I believe that proper presentation of the consultation package will result in meaningful feedback for you, Lyle, as the decision maker and buy in from all parties for the project work.

Snowmobiling in the Elk Valley is an important tourism driver for these communities in the winter months. Our snowmobile clubs manage this tourism opportunity and have made significant investments in our trails, grooming equipment, improvements to shelters, and recently built new infrastructure such as the Wrangler Cabin and Elkford Snowmobile Cabin. We invest in tourism initiatives such as <a href="https://www.sledkootenay.com">www.sledkootenay.com</a> and our clubs work hard to educate the public on responsible snowmobile recreation.

We look forward to working with you and would appreciate receiving back the committee information requested, the information on future AMA creation, as well as a decision on whether H120 will be postponed for this season as well. We would appreciate your reply to these questions by September 9, 2020

Sincerely,

**BC Snowmobile Federation** 

Donegal Wilson
Executive Director

Executive Directo

cc. via email

Meghan Anderson FLNR:EX Meghan.Anderson@gov.bc.ca

John Hawkings, RSTBC <u>John.Hawkings@gov.bc.ca</u>

Fernie Snowmobile Association admin@ferniesnowmobile.com

Elkford Snowmobile Association <a href="mailto:rmdown@shaw.ca">rmdown@shaw.ca</a>

Summit Creek Cabins innontheborder@yahoo.com

Kim Smith, ATVBC kim@atvbc.ca

Louise Pedersen, Outdoor Recreation Council louisepedersen@orcbc.ca