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Tourism industry position regarding the NRRA

Adventure tourism operators utilize Crown land and depend on resource roads. These businesses were established with a certain understanding of what the rights and responsibilities pertaining to Crown land and roads would be. Tourism operators generally have a limited capacity to accept an additional burden for road maintenance. Our primary concern is that 'downloading' the responsibility for resource roads will result in additional financial burdens for members of our associations. This can prevent us from meeting the goals that government has set for us.

From our perspective, our use patterns do not compare to those of other, larger industries. Tourism operators are typically seasonal businesses with a very light footprint on resource roads. In rare instances a tourism operator may be the largest commercial operator on a resource road, but will use it considerably less than the general public. Thus, tourism operators should be below the threshold where they can be unilaterally named as "designated maintainers" or be required to accept maintenance obligations.

Greater clarity on the responsibilities of operators that choose to become road maintainers or agree to assist with road maintenance is needed. The preliminary NRRA Issue Paper provides a very broad vision of what the 'downloaded' responsibility might entail. The few tourism operators that do 'opt-in' will need a fair and consistent guiding structure that outlines the parameters of responsibility. This would include some type of formula to properly recognize and consider our actual footprint on resource roads. These operators will also need a mechanism to 'write-off' the costs of that maintenance.

In summary, the WTA position is as follows:

- (1.) that tourism operations will be below a threshold level where MFLNRO "statutory decision-makers" could unilaterally name us as designated maintainers;
- (2.) that tourism can have an opt-in process where operators could choose to participate in road maintenance;
- (3.) that this can be done via a formula recognizing our actual foot-print; and
- (4.) that we can have a mechanism to write-off those costs (where we choose to opt-in) in a way that is consistent with all other resource sectors.

With our concerns clearly outlined, we are cautiously optimistic that government will find a process that works with tourism. We have selected Scott Ellis (GOABC) to represent our tourism coalition on the NRRA steering committee. We also request that monthly briefings by the Ministry of Forests, Lands and Natural Resource Operations be provided to all members of the tourism coalition to ensure clear communication throughout the NRRA process.