



November 16, 2010

Mr. John Hawkings,  
Provincial Trails Strategy,  
Recreation Sites and Trails,  
Ministry of Natural Resource Operations,  
42000 Loggers Lane,  
Squamish, B.C., V8B 0H3  
[John.Hawkings@gov.bc.ca](mailto:John.Hawkings@gov.bc.ca)

Dear Mr. Hawkings;

**Re: Off-Road Vehicle Trails, from perspective of naturalists**

BC Nature (Federation of BC Naturalists) is a founding member of the Coalition for the Licensing and Registration of Off-Road Vehicles (ORVs) in British Columbia. As our name implies, our interests lie in conservation and appreciation of nature. Our concerns and representations to government regarding the need for better regulation and management of Off Road Vehicles in the interest of protecting and enjoying our wild heritage date back to the 1970s. We are also a member of the Joint Advisory Group (JAG) providing input during the preparation of Regulations to better manage Off-Road Vehicles, to take effect November, 2011.

BC Nature is concerned that the voice of non-motorized outdoor recreation may not be heard in proportion to its actual participation in outdoor activities. With respect to trails, we have a number of concerns and recommendations relating to trail development, land use and a trail trust fund. Since these are not part of the process for drafting Regulations applicable to off-road vehicles, on the advice of Vera Vukelich, Manager of Off-Road Vehicles for Tourism Recreation and Coordinator for the Joint Advisory Group, we are addressing them to you.

The following, then, are the points we wish to make:

1. It is our position that there should be no further fragmentation of natural areas/habitat. What is known as "edge effect" has been shown to create a much broader disturbance to adjacent areas than is generally recognized. This means that whereas a given trail may seem innocuous, its effects, such as changes in air movement, light penetration, etc., can be far more widespread than the immediate area of the trail itself. Furthermore, heavily used trails can affect wildlife movement patterns. The need of wildlife for connectivity between larger natural areas is well documented. Where the connection is a narrow corridor, there may not be space to accommodate a trail, whether for non-motorized or for motorized recreation, without negatively impacting wildlife. It is also well known that loss of habitat is one of the major causes of species decline and resulting loss of biodiversity. Noise pollution, also, has been scientifically proven to be

harmful to humans as well as wildlife.. Therefore, we seek assurance that wildlife considerations will be paramount in routing trails and sanctioning existing trails.

2. We wish to see trail building, whether for motorized, mechanical (mountain bikes) or non-motorized, overseen by the Trails Strategy such that no trails could be built anywhere without a permit from the Trails Management Body and that those trails planned must be sanctioned by wildlife experts as well as local representatives as to their suitability, location, etc.
3. With respect to fines that may be levied under the upcoming Regulations and, specifically, to the disposition of funds generated by fines, BC Nature does not wish to see funds raised through such fines allocated to trail building. Such fines would likely be levied in situations where a vehicle is being ridden in a sensitive area such as mud-bogging in a wetland or damaging grasslands. Therefore, we recommend that such funds be allocated to rehabilitation or purchase of natural areas and enforcement of the ORV Regulations. BC Nature supports the suggestion, made at a recent JAG meeting, that such fines could be deposited with the Habitat Conservation Trust Foundation.
4. Finally, the Provincial Trails Strategy must set far-reaching goals. Though B.C. seems vast, constant fragmentation of natural areas for whatever purpose would, over time, erode our famed wilderness and natural areas and the ecosystems they represent, to the point where there would be only pockets left, with diminished biodiversity. Tourists from Europe and other areas where there are no or very few natural areas left intact come here for the purpose of viewing wildlife and/or taking in activities that allow them to experience our natural heritage. We must not deprive future generations everywhere of that privilege - and it is a privilege, not a right, to roam as widely as we are presently able to do.

Yours Sincerely,



John Neville,  
President

cc.

Vera Vukelich, Manager of Off-road Vehicles for Tourism Recreation and ORV JAG Coordinator.

Vukelich, Vera NRO:EX[Vera.Vukelich@gov.bc.ca]

Joan Best, BC Nature representative to the ORV Joint Advisory Group