



Environmental Law Centre

Murray and Anne Fraser Building
University of Victoria
P.O. Box 2400 STN CSC
Victoria, BC, Canada
V8W 3H7

www.elc.uvic.ca

B.C. Parks Permit Granting Process

Researcher: Kashmir Gandham

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Kashmir Gandham

Faculty of Law
University of Victoria

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Instructor Tim Howard

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This paper focuses on the nature of the permit granting process for B.C. Parks and B.C. Assets and Lands ("BCAL"). B.C. Parks grants Park Use Permits ("PUP's"), by means of their specific permitting process, to operators to conduct business inside a provincial park, as opposed to BCAL which utilizes a tenure process. This project will provide clarification on the features of these two separate processes, specifically their similarities and differences.

B.C. Parks – Park Use Permits

Key Regulatory/Policy Document

The following information comes from the B.C. Parks **Park Use Permit Manual** and is therefore policy rather than substantive law.

Section 20(2) of the B.C. *Park Act* states that "The minister or his authorized agent may issue a park use permit

- (a) on receiving an application ..."

Section 21 of the *Park Act* states "A park use permit or resource use permit must not be issued to authorize the removal, destruction, disturbance, damaging or exploitation of any natural resource or any work, occupancy, undertaking or activity incidental to it unless

- (a) a written application has been made for it by the person to whom the permit is issued

Under Section 5 of the *Ecological Reserve Regulations* a written application is required for all permits and the application must include the following information:

- a description of the proposed use;
- a description of the areas of land to be affected, with an accompanying map;
- a description of the means of access to be used;
- the duration of the proposed use;
- the ecological impact of any activities that will be undertaken within the reserve under the permit;
- the number of individuals that will be entering the reserve under the permit, and, where possible, their names; and

- the name of the individual who will direct the proposed research or educational programme

General Criteria

Except as may be required under specific permit categories outlined in Chapter 4 – Permit Categories of the **Park Use Permit Manual**, the following guidelines apply:

- individual applicants are 19 years of age or older;
- companies must be incorporated or registered in B.C. in accordance with the *Company Act*.

Pre-Application Consultation

Prior to submitting a formal application, a potential applicant may submit a letter of intent or have preliminary discussions with B.C. Parks regarding the proposed use/activity. Potential applicants are encouraged to undertake pre-application discussions with B.C. Parks and other government agencies to:

- reduce the risk of application deficiencies;
- identify potential concerns to the proposed use/activity early in the process;
- provide opportunities for amending the action concept, if necessary; and
- provide an opportunity for B.C. Parks to reject an inappropriate use/activity before the applicant has invested substantial time and effort.

This process appears to be beneficial not only for B.C. Parks but for the applicant as well. However, the one disadvantage is that public consultation is lacking here. Public concerns may sometimes identify potential problems with the proposed activity/use that B.C. Parks may not have identified.

Application Adjudication

Initial Review of the Application

The lead officer shall initially review the application with consideration given to the following questions:

1. What section of the *Park Act* or the *Ecological Reserve Act* would authorize the activity/use?
2. Is the application logical and straightforward or is there information that is missing or unclear with respect to the intent of the application?
3. Does the proposed activity/use conflict with B.C. Park's mandate respecting conservation and recreation goals and the primary purpose for which the area was protected?
4. What is the relation of the proposed activity/use to the Protected Area Management Plan and to other relevant planning/conservation documents?
5. Does the area need the proposed activity/use?
6. Does the proposed activity/use depend upon the specific resources in the area; does it enhance visitor "experience"; does it contribute to conservation management or would it simply make use of the area because it is a public place and/or a protected area?
7. What are the possibilities of accommodating this proposed activity/use outside the B.C. Parks jurisdiction?
8. Would the proposed activity/use conflict with established appropriate uses, and how would the activity/use affect the balance between established appropriate uses?
9. Would this proposed activity/use require a commitment of public resources and facilities for the exclusive benefit of a few persons, and how would other users view this commitment?
10. How does the proposed activity/use fit in with the "desired visitor experience"?
11. What are the long and short-term irreversible effects that this proposed activity/use would cause to protected area values, facilities, and programs?
12. Is it possible to mitigate or to repair the adverse effects upon protected area values caused by the activity/use?
13. Do circumstances exist where the applicant would need special consideration? If so, what would be the criteria for permitting this request and denying others of a similar nature?
14. Is it possible that in permitting a proposed activity/use that an unacceptable precedent would be set for B.C. Parks?
15. What would be the difficulties of terminating this activity/use once begun?
16. Would there be future costs, beyond normal inspection cost, to monitor the proposed activity/use?
17. Is there a need to prepare a Decision Issue for the minister?

18. Will a public meeting be required?

19. Have fiduciary responsibilities been considered?

20. Is there a requirement or need to do a B.C. Parks Impact Assessment Process at a level greater than Level 1 Preliminary Screen?

It is important to note that at any point in the review process, the application can be disallowed for reason according to the **Park Use Permits Manual**.

B.C. Park Impact Assessment Process

If, after the initial review, the application has not been disallowed, the lead officer shall, if necessary, complete the Level 1 – Preliminary Screen of the B.C. Parks Impact Assessment Process. Depending on the complexity of the activity/use proposed in the application, the lead officer may require the applicant to complete Level 2 or greater of the B.C. Parks Impact Assessment Process. The completed impact assessment report shall be attached to the New Permit Application Routing Sheet and forwarded to the review team as designated by the lead officer. A permit application is considered non-reviewable under the B.C. Parks Impact Assessment Process if it is known that the action does not result in any significant environmental, social or economic impacts. Some of the non-reviewable permit applications are:

- New applications for existing permitted minor recreational activity where cumulative impacts are not a concern e.g. guided hiking;
- Data and information gathering that does not involve any physical changes or disturbances to the environment or its features, e.g. small scale and site specific species inventories, mapping etc; and
- Applications for an activity/use in a protected area in which a previous B.C. Park Impact Process has been completed.

If required, inspections of the proposed use area are to be undertaken as part of the impact assessment process. The impact assessment report (at the appropriate level) will contain recommended mitigation and protective clauses to protect the area against unwanted environmental, recreational and facility impacts that may result from the proposed use. Applicants requesting a park use permit or a resource use permit to authorize the removal,

disturbance, damage, or exploitation of any natural resource, or work, occupancy, undertaking or activity incidental to it, may be required to indicate in writing that they will pay the costs incurred by the Province to survey, cruise, examine and inspect the area to be affected. These costs may be charged to the applicant even if the application is disallowed.

After the review has been completed, permit applications are normally approved or disallowed by the District Manager. For controversial issues or permits which will have a major impact on park act lands or ecological reserves, the approval or disallowance decision should be referred to the Director of B.C. Parks, and the Ecological Reserves Management Branch.

Permit applications requiring Director, Assistant Deputy Minister, Deputy Minister or the Minister's review shall be prepared by the district for submission to the recommendation to issue or not issue or no issue the permit. Justification for the recommendation shall be included in the submission as well as the completed impact assessment report.

Under the *Environmental Assessment Act*, "reviewable projects"¹ that effect park act lands will have to be assessed under that Act.

Decision Letter

If a permit application has been disallowed, a decision letter shall be sent to the applicant clearly indicating the reason for the disallowance. Permit application disallowance letters are signed by the District Manager.

Special Circumstances

Interviews

Interviews of permit applicants may be held at the discretion of the District Manager or designate.

¹ This term is defined in the *Environmental Assessment Act*. It is beyond the scope of this project to reproduce here. It is important to note, however, that not all projects will fall under the category of being a "reviewable projects".

Advertising

Advertising is required, under Section 20(3) of the *Park Act*, in the B.C. Gazette and one issue of a newspaper circulated in the Province where it is "the good intention to issue a PUP to authorize the offering of goods, services, accommodation or equipment for sale, hire or rent to the public." B.C. Parks' policy is to advertise all commercial enterprises which are to be issued for an exclusive or limited basis.

Approximately two weeks should be allowed between the advertisement of intention of the PUP to allow sufficient opportunity for any response. Notwithstanding the above, B.C. Parks does not advertise the intention to issue a permit authorizing commercial activities where:

- The base of operations is outside the park;
- No exclusive or limited rights are given;
- The permittee derives profit from access to and use of park territory only; and
- No private developments are permitted within the park

Issuance of Permits to Canada or other Provinces

Even though the primary pieces of legislation for issuing permits are either in the *Park Act* or the *Ecological Reserves Act*, the *Ministry of Lands, Parks and Housing Act* also applies to the issuance of permits. Section 6 of the *Ministry of Lands, Parks and Housing Act* states:

For the purpose of this Act the minister may enter into agreements

- (a) subject to the approval of the Lieutenant Governor in Council, with
 - (i) the government of Canada or its agent, or
 - (ii) the government of a province or its agent, or
- (b) with any other person or a municipality

When a permit being issued is an agreement with Canada or another province (which includes a territory), the Order in Council requirement of section 6 of the *Ministry of Lands, Parks and Housing Act* must also be met.

Reissuance of Permits

Permit reissuance means that upon the expiry of a permit, a replacement permit is prepared or a Permit Renewal Certificate is issued to allow for the continuation of the permitted use or activity. The majority of permits issued by B.C. Parks contain a provision that allows the permit to be reissued at the discretion of the Province upon its expiry. The exceptions to this are permits issued for one shot activities or uses such as single trip recreational guiding or film productions.

The lead officer reviews each permit file to determine if the permit should be reissued. This shall consist of:

- reviewing inspection reports;
- discussions with the Area supervisor responsible for monitoring the permit; and
- reviewing the original commitment to determine if the permit should be reissued or if the permitted use has been completed and the permit terminated.

B.C. Parks may refuse reissuance of a permit for any of the following reasons:

- fees or other monies due to the Province are in arrears;
- failure of the permittee to observe or perform any provision, condition, or covenant of the permit;
- failure to use rights authorized under the permit;
- the authorized activity represents a danger to public safety;
- the authorized activity is no longer consistent with the goals, objectives, or policies of B.C. Parks;
- the permitted use is no longer compatible or appropriate;
- the authorized activity is causing environmental damage;
- the authorized activity is causing conflict with other users; and
- a public proposal call will be utilized to award the opportunity to carry out the authorized activity.

There are some exceptions to the above reasons. For example, a holder of a valid right which pre-dates the existence of park act lands is not obligated to renew a permit to retain the rights. In

addition, a permitted use such as land use/occupancy may be incompatible or no longer consistent with B.C. Parks goals, but, may require reissuance for the public good if there is no reasonable option left but to continue authorizing the use, such as a major utility corridor.

It is imperative to note that where B.C. Parks decides not to reissue a permit which authorized a right that pre-dated the park, recreation area or ecological reserve or in some cases a right granted under a permit, compensation may be required for the extinguishment or any restriction to the rights.

When issuing new permits, or reissuing permits with new or expanded rights, an assessment should be made as to whether or not the issuance of the new or modified permit could infringe on the exercise of any aboriginal rights. If so, then consultation with First Nations and/or modifications to the permit should be considered. For permits issued after 1993, B.C. Parks must ensure that there was an assessment of aboriginal rights and any infringement. If this was not done, and it appears that there may be an infringement, an assessment should be undertaken prior to reissuance. If there is no infringement, then consultation is unnecessary.

This is also a disadvantage as the consultation with First Nations should be a more organized and thorough process. The language used simply states that modifications to permits "should be considered". A more effective approach would be to have the language state that "modifications shall be considered" essentially making it mandatory to address First Nations' concerns.

Other Operational Considerations

Multi-Use Permits

A single permit may be issued to a permittee covering related uses. For example, a permit issued for a structure may also include a road, water system, dock, etc.

District Multi-Park Permit

A single permit covering multiple parks within a district may be issued at the discretion of the District Manager for similar activities or uses. Examples of uses that can be authorized by a

multi-park permit are non-exclusive recreational guiding, research activity or operations permits. Unrelated uses should be continued to be authorized by separate permits.

Multi-District Permits

Where a similar activity such as recreational guiding or research activity takes place in two or more districts a single permit document may be issued in accordance with the following criteria:

- the use levels are not intense;
- a single "master permit" is issued and administered by a "lead district" (the district where the most of the use takes place);
- the permit should be signed by all District Managers concerned or the "lead" District Manager may execute the master permit upon written consent of the other District Managers;
- each district is to provide special conditions to be included in the permit;
- each district is to provide a permit number to be entered on the permit document, this is required to ensure the permit is included in each district's permit data base;
- the lead district will be responsible for obtaining proof of insurance, reports and the appropriate permit fees and distribute copies of the permit document and associated material to each district office concerned; and
- if a management problem occurs the district concerned shall deal directly with the permittee and provide a copy of all correspondence to the "lead district" and the other districts if required.

Province-Wide Permits

A province-wide permit may be issued from headquarters in accordance with the following criteria:

- the use or activity takes place in all or the majority of the districts (9 or more);
- the use or activity is similar throughout the province;
- the use or activity is minor in nature;
- each district is to provide a permit number to be entered on the permit data base;
- the permittee will be responsible to contact each district when conducting the use or activity or use in the district; and

- the district is to provide headquarters with details regarding any problems and recommendations for permit conditions

Permit Monitoring

B.C. Parks also conducts permit monitoring which is the ongoing evaluation on the conduct, operations or activity of a permittee and may include unsolicited information. The following are some of the sources of information available to monitor the permit:

- ongoing review by staff working in the permit area;
- newspapers, magazines and other publications;
- letters of complaint;
- comment cards;
- written reports from other park or government staff;
- conversations with park or government staff; another permittee or the public;
- unplanned or casual visits to the permit area; and
- the "grapevine"

Information received from the above sources shall not be used to instigate any action in respect to the permit or the permittee. If the information is of concern, a formal inspection of the permit is to be undertaken before any action is taken.

Lastly, there is no annual report of PUP's available.

BCAL – Tenure Process

Key Regulatory/Policy Document

The **Recreation Tenure Management Agreement** is a long-term agreement between the Ministry of Environment, Lands, and Parks² ("MELP") and BCAL to manage recreation tenures on provincial Crown land. It states that "All aspects of the Crown land commercial recreation application referral process will be publicly transparent so that public concerns can be heard,

² In light of the Liberal Party forming the new B.C. government, the official name of the former Ministry of Environment, Lands, and Parks has now been changed

understood and addressed." *This is one point that CPAWS can likely advocate upon as they can investigate and determine if the process is ultimately transparent to the public.*

General Requirements

An application for a Crown land tenure goes through four stages. Although the requirements vary for each type of tenure, the following process is generally what is carried out. The following information is based on policy documents and statements from BCAL rather than being substantive law. To be eligible for a Crown tenure, one

- Must meet the general requirements and any specific eligibility requirements for the proposed tenure; and
- Must not have more than 520 hectares of Crown land under application at one time

The general requirements referred to above are that one must be:

- a Canadian citizen or permanent resident, 19 years of age or over; or
- a corporation registered in B.C. or incorporated under B.C. law; or
- a registered partnership in B.C. or Canada; or
- for foreshore leases, the Canadian or non-Canadian owner of adjacent uplands

Initial Review

When an application is received in a BCAL office, it is registered in a database which allows staff to easily track the progress of that application. All applicants are assigned a file number and a BCAL contact name. BCAL staff then ensure the application:

- is complete;
- is from an applicant who meets the eligibility requirements;
- is for a land use administered by BCAL;
- is consistent with existing land use plans for the area;
- does not seriously conflict with existing tenures or uses; and
- provides reasonable justification for the use, site, and amount of land being proposed.

Other steps in the initial review include:

- checking existing land use maps and BCAL status maps to ensure there is no obvious conflict between the proposed use and existing uses;
- checking for potential impacts to areas of environmental, social or cultural significance; and
- reviewing the size, location, and configuration of an application area to ensure it suits the nature and type of proposed activities

Following this, the major assessment of the applications is made to determine whether a tenure will be granted. The assessment is based on the following principles:

- Best Use: allocating land to comparable and suitable uses, as determined by interagency referrals, social and economic needs;
- Limited Supply: recognising that the supply of suitable and available land is limited; and
- Equity and Fairness: ensuring equal and fair treatment of all applicants through consistent policies and fair market value pricing

Advertising

The majority of applications must be advertised in local newspapers and in the B.C. Gazette, using a format prescribed by BCAL. The advertisements must clearly describe:

- The tenure location
- Types of activity proposed; and
- The rights that may be granted

This is a beneficial aspect of the project as its purpose is to allow the public an opportunity to learn and comment on a particular application.

Formal Review of Applications

BCAL then undertakes a detailed status review of the land for which the application is made. Status maps and land use plans are thoroughly reviewed to ensure the subject land is available for allocation under the *Land Act*. BCAL staff also look for:

- Any legal encumbrances;

- Potential environmental issues;
- Community concerns; and/or
- User/client conflicts.

Referrals

Next, the application packages are sent to agencies at all levels of government, local community organisations and stakeholder groups, First Nations communities, and any parties who may have an interest in the specific application. The referral process may include:

- Federal agencies, such as Coast Guard or Fisheries and Oceans;
- Provincial ministries, including Environment, Lands and Parks, Forests, Small Business, Tourism and Culture, Transportation and Highways, Aboriginal Affairs, and Energy and Mines;
- First Nations;
- Stakeholder or special interest groups;
- Local and regional governments;
- Current holders of Crown land tenures covering the same area; and
- Local interest groups and organisations

Although it is beneficial to refer the applications out to the above agencies, the disadvantage is that the packages are not sent to B.C. Parks. ***Therefore, CPAWS can argue that these applications should be sent to B.C. Parks as well in order to reduce the potential for conflict arising out of the different permitting processes.***

Consultation with First Nations

Furthermore, to meet B.C.'s responsibilities to First Nations when dealing with Crown lands, BCAL has developed Aboriginal Interest Assessment Procedures. These procedures guide consultation between BCAL and First Nations communities in the allocation of Crown land. BCAL also works closely with the provincial Ministry of Aboriginal Affairs.

Assessing Environmental Impacts

In addition, BCAL is responsible for obtaining a full review of the environmental impacts of all applications. Therefore, applications for tenures with potential environmental impacts:

- Are referred to MELP for technical assessment of all impacts, including those on wildlife and water quality;
- Are not approved unless they comply with MELP's requirements;
- Will not incorporate MELP's recommendations to mitigate impacts into the management plan and tenure document; and
- May be subject to environmental concerns cited by other provincial/federal agencies, environmental organisations and/or community groups.

Assessing Economic Benefits

The commercial viability of an application to provide viable and sustainable economic benefits is assessed based on information from:

- The applicant;
- Local, regional, provincial and federal government agencies;
- Local communities; and
- Stakeholder groups

Granting the Tenure

BCAL staff generally visit a site to verify any concerns and gather additional information before a decision is made on an application.

With respect to granting the actual tenure, the decisions are based on:

- Input from the referral process;
- A site visit;
- Public consultation;
- Review of responses to advertising; and
- Tenure area status information

If, based on the above, the proposed project is not acceptable, the tenure will not be granted and the applicant receives the reasons in writing. If the proposed project is acceptable, the applicant will receive a cover letter and the tenure agreement. If the proposed development is not yet acceptable but would be if changes were made, the applicant will be given the opportunity to change the proposal.

Modifying the original proposal often answers concerns raised during the assessment so the tenure can be approved. Changes could include:

- Changes to the timing or location of activities to minimise potential resource use conflicts; or
- Restrictions on some uses in response to local or First Nations concerns

These changes can be incorporated into the legal tenure document.

When a tenure decision is made or a successful applicant is selected from a competitive process, BCAL will sign the tenure document. Possible preconditions may include:

- Buying liability insurance;
- Posting performance bonds; and
- Obtaining required permits or licenses from other agencies

A copy of the tenure document and an offer letter are sent to the successful applicant. To obtain the tenure, the applicant must:

- Meet the preconditions of the offer;
- Sign the documents and return them to BCAL; and
- Pay the documentation fees which come due when the final tenure documents are issued.

BCAL then approves the tenure and returns an original set of documents to the applicant. These documents are a legal contract between BCAL and the tenure holder. The contract states:

- What the individual or corporation is entitled to do with the Crown land;
- How these activities are to be carried out; and
- The rent and/or royalties due, which are usually paid on the anniversary date of the tenure.

Failure to honour contract conditions or to make payments is a breach of the contract and will result in enforcement actions by BCAL

Legal Status of a Tenure

The legal status of a tenure is that the tenure document is a legal contract between BCAL and the tenure holder. This contract states what the individual or corporation can and cannot do with the Crown land and how these activities are to be carried out. Tenure documents often include specific directions, such as:

- Constraints on activities or developments;
- Requirements such as training or fencing to protect the environment;
- Measures to minimise potential resource use conflicts; and/or
- Conditions established in response to local or First Nations concerns.

The province delegated implementation of the commercial recreation policy to BCAL from the Ministry of Environment, Lands, & Parks in October 1998. Under this agreement, BCAL acts as the land owner for the provincial government. For commercial recreation activities, one must obtain BCAL's approval to use Crown land, in the same manner as one would need to obtain permission from a private land owner to use privately owned land. It is imperative to note that only parties to a contract, and not third parties, can enforce the terms of the contract.

Revocation

Under the B.C. *Land Act*, **trespass** occurs if the holder of an existing land tenure does not comply with the terms and conditions of the tenure. The process for a breach of contract by a tenure-holder is:

- The breach of contract is identified;
- The tenure holder is given up to sixty days to provide reasons for the non-compliance;
or
- A "stop work" order is issued immediately if the infraction creates a problem, such as environmental damage or a safety hazard.

If the trespass activity continues, the public officer will issue a Trespass notice which may indicate any or all of the following:

- The trespasser is required to cease the trespass;
- The tenure held by the trespasser under the *Land Act* has been cancelled;
- The trespasser must pay an amount to the government to restore the Crown land;
- The trespasser is required to remove improvements made by the trespasser; and/or
- A person has been authorised to seize the trespasser's goods and improvements

The commercial recreation policy incorporates consultation as a core function in making decisions on proposals and applications. All applicants requesting a tenure for commercial recreation must advertise their application to determine if there are public issues or concerns. Applications involving temporary tenures may also be asked to advertise. Advertisements must clearly describe the tenure location, types of activity proposed and outline the rights that may be granted. Additional consultation processes, such as open houses and public meetings, may be required depending on the scope and details of the application. ***The public meetings and open houses are forums in which CPAWS can advocate their views if they are opposed to any particular tenure.***

Overall, the potential for revocation of a tenure is important since it is a possible point to advocate on.

Monitoring

There is monitoring of commercial recreation activities to ensure compliance with policy and encourage operational standards that relate to public safety.

A commercial recreation tenure grants an operator the right to use a defined area of Crown land for specific purposes. Often these rights are non-exclusive so more than one tenure can cover the same area. In most cases, the public continues to have access to the Crown land included in the tenure. These tenures:

- encourage operator stewardship and management of Crown land and resources; and
- encourage safety by requiring the operator to meet industry standards and to carry insurance.

Miscellaneous

Not all Crown land applications go through a formal public consultation. BCAL receives thousands of applications each year and some of these are for temporary uses or for uses with no noticeable impacts on the land (i.e. permits for guided walking tours, licenses for use of public utility rights of way). However, almost all applications are advertised and go through a formal referral process. If these processes indicate that there are significant issues or public concern with an application, then more extensive forms of public consultation will be undertaken

The following goals govern decisions on commercial recreation tenures. In granting tenures, BCAL states that they strive to:

- maintain public access to the natural environment;
- ensure responsible stewardship of the natural environment;
- protect sensitive wilderness and wildlife areas;
- acknowledge fish and wildlife needs;
- ensure compatibility and minimise conflicts with other resource uses;
- require consistency with land use planning;
- protect cultural and heritage sites;
- ensure activities will be appropriately monitored;
- support a diverse and sustainable economy; and
- encourage public safety in commercial recreation opportunities and activities.

Some land use applications generate significant community interest and controversy. In response, BCAL can:

- Call a public meeting;
- Co-host a meeting with federal, municipal or regional staff; or
- Require the applicant to conduct an open house or public meetings

Public meetings provide opportunities for greater public input regard complex or contentious proposed land uses.

Advisory group input is invited in cases where proposed land uses have the potential for a significant impact and/or conflict. Existing advisory groups are used whenever possible, however BCAL may require the formation of a formal or ad hoc advisory group to review the application and provide input. BCAL may also invite the public to general information meetings with advisory groups. Stakeholder groups, such as recreational or environmental organisations, are consulted on proposals which impact on their interests. These groups can become part of the formal referral process.

One of the major pro's of this particular process is that First Nations have many opportunities to be involved with commercial recreation. For example, they can apply for a commercial recreation tenure. If they are already involved with commercial or backcountry activities of some type, this gives them special knowledge and experience that they can incorporate into their application and management plan. There also are opportunities for First Nations to partner with other applicants.

Lastly, there is no annual report of leases/tenures available.

Comparing the Two Processes

Similarities

Both processes have the same general legal requirements, for instance, applicants have to be at least 19 years of age or have to be a B.C. registered company etc. Also, both B.C. Parks' and BCAL's initial reviews of their specific applications are essentially the same. For example, checking to see if the activity conflicts with another established activity, the environmental impacts of the activity, and checking to see if the land will accommodate the activity in question. Additionally, both processes require that the applications be advertised in the Gazette. Finally, both BCAL and B.C. Parks have a monitoring process where officials conduct an ongoing evaluation of the activity/use to ensure compliance with their original respective agreements.

Differences

One of the major differences between the two processes is that BCAL sends application packages to any other agency which has an interest in the lease for their review and subsequent