



Revelstoke, May 12, 2021

Ms. Kelly Greene, MLA  
Parliamentary Secretary for Environment  
kelly.greene.MLA@leg.bc.ca

**RE: Feedback on the BC Parks Day Use Pass Pilot**

Dear Ms. Greene,

The Outdoor Recreation Council of BC has been invited to give input on BC Parks' day use pass pilot that was implemented last summer in six popular parks: Golden Ears, Cypress, Mount Seymour, Stawamus Chief, Garibaldi and Mount Robson. To help inform our feedback, we asked BC Parks to provide us with evaluation reports of last year's pilot and for any reports and studies that were used to initiate the program in the first place, such as carrying capacity and safety studies, evaluation of alternative options, and detailed program costs. Except for an overview of visitor cap calculations and day use pass allowances, none of these essential documents were available.

Rather than address specific operational issues of the day use pass program as directed by the survey, we will instead challenge the assumption that the day use pass program is the best management tool given the issues it's trying to solve. Our questions are what are the key issues that BC Parks is trying to solve, and is a day pass program the best management tool?

**Issue identification**

In the consultation letter, BC Parks has identified the issues as:

- Safely manage visitor use during the peak season to some of the most popular parks
- Manage parking availability, crowding of facilities, and congestion at narrow viewpoints and pass points
- Protect natural and cultural values, ecological integrity, and visitor experience in parks

In a recent statement [quoted in the news](#), the Ministry of Environment and Climate Change Strategy indicated that the day pass program has been "an effective tool" for managing growing demand from park users. "Park visitations in the South Coast have increased by 57 percent, from over 6.5 million visitors in 2010 to more than 10.3 million visitors in 2019," the ministry said. "If this trend continues, we will see 16 million visits to parks on the South Coast by 2029. Overuse of our trails leads to trail widening, soil erosion, damaged vegetation and altered hydrology. That's not good for the long-term health of our treasured provincial parks." The

ministry also noted that crowding can have negative effects on the visitor experience, park staff and public safety. "Now more than ever, it's important for British Columbians to experience nature, but to do so in a way that is safe and protects ourselves and our loved ones," the ministry said. "The free day pass has proven to be an effective tool to manage growing demand, the continued health of our parks and the safety of British Columbians. Day use passes also manage the number of people traveling to busy parks, reducing traffic congestion on our parking lots and roadways."

### *Resource protection*

Visitor caps can be entirely appropriate when safety is an issue or when trying to protect a particular experience or ecological or cultural resource. If there's a threat to protecting sensitive resources, the area should either not be used, or infrastructure should be developed to protect the resource. If resource protection is an issue, what studies were conducted to support restrictions and what options were considered to maintain or upgrade the trails?

At least four of the parks included in the pilot were established to provide intensive recreation opportunities in summer, and they have the infrastructure that can handle it, including Cypress, Seymour and Garibaldi (the access route to Diamond Head is a road). These have trails that are well-suited for new hikers as they are near population centres, easy to use and well signposted.

### *Parking*

Parking lot capacity is not an issue for a park like Seymour. You might have 800 people on 20 km of trail if they stayed just on the Mt. Seymour Mountain Trail over a day. If they walked over the ski runs up to Mystery Lake or went to Elsay Lake, you would see even more dispersal.

Parking restrictions can be an effective tool to manage visitor use. Parking lots at trailheads can be restricted or expanded to manage crowds. Parks such as Golden Ears have used this tool with success in the past. If the parking lot is full, park attendants or digital displays let incoming visitors know that the parking lot is full for the time being.

### *Safety*

Safety is cited as a primary concern by BC Parks. Dr. Bonny Henry, has repeatedly encouraged British Columbians to get outside. We know by now that the transmission of the virus outside is minimal. Restricting access to our provincial parks without proper reasons works against the ethos of embracing the outdoors as a resource that strengthens the physical, mental and social health of British Columbians. If safety was a concern, why are other parks, primarily high use municipal and regional parks, relying on signage to encourage social distance?

### *Recreation experience and crowding*

The recreation experience and crowding was another issue that BC Parks wanted to address with the day use pass. We would be interested in learning about what social research has been conducted on trail crowding for popular trails in the parks to support restrictions and how many letters BC Parks have received on trail crowding. Where the protection of experiences such as wilderness is sought, then the restriction of visitor numbers or usage types can be good park

management practice; however, the park trails involved are not trying to provide a wilderness experience. Some parks, such as Seymour, Cypress, Cultus, were established to provide intensive recreation use. If the recreation experience or crowding happens, you close the area until space opens up. The visitor caps posed by BC Parks are based on peak use, which may happen up to 10 times (sunny weekend/holiday) in summer but will be applied daily (100 days). We would like to see more research and data collection going into the setting of visitor caps.

#### *Trail inventory*

BC Parks is correct that the number of people who are keen to visit the parks is growing. Over the past three decades, new trail construction within BC Parks has been minimal, and many existing trails suffer from a lack of maintenance. In our communications with BC Parks, we understand that there is limited interest in addressing what really is the root cause of the issue that we experience now, a lack of recreation opportunities within the park system that could take the pressure off the existing trails. By simply applying a band-aid (a day pass system) without also addressing the underlying issue posed by a chronic lack of investment in trail expansion to help disperse visitors and provide a variety of experiences, BC Parks is not moving towards any solutions; they are simply making the parks less accessible to those who need them the most.

The day-use pass pilot has had several unintended consequences.

#### *Impacts on organized recreation groups and individual park visitors*

ORC member, the Federation of Mountain Clubs of BC, will have shared with you some of the impacts that the day-use pass had on organized hiking groups. In a survey of our members last year, we heard similar feedback, including the disadvantage of having to book the morning of which made trip planning for groups very difficult. For the recreating public, the program is not only an inconvenience; it effectively limits safe and sustainable access to the outdoors. As with the campsite reservation system, the pass sets systemic barriers for certain populations who don't have access to or are able to use the necessary technology to obtain the passes. Parallel to the shift we're seeing for campsite registrations where 100% reservable sites are gradually becoming the norm, we are concerned about the loss of spontaneous outdoor recreation opportunities that the day use pass creates.

#### *Impacts on trails and wilderness areas outside of the park system*

Our park system has many benefits to the public, including reliable information that helps us plan our trip, well-established trails, signage and infrastructure such as parking, bear-proof garbage cans, boat launch areas and outhouses. As access for the public is restricted, recreationists will go elsewhere, including to areas such as wilderness areas with sensitive ecosystems or other areas that are not equipped to handle large numbers of recreation users (lack of toilets, lack of designated parking areas, trails not well maintained or signposted) and hence spreading the impacts and issues to other areas. A systems approach should be taken and deliberate planning for displacement to address those issues and implications.

## Recommendations

While the Ministry of Environment and Climate Change Strategy [claims that the day pass program has been an effective tool for managing visitation](#), we have seen no documentation that supports this claim. We are concerned that what appears to be a hastily implemented visitor management strategy with high financial costs to the public and impacts on outdoor recreation and the lands outside of parks will be endorsed by the BC Government without a careful and transparent evaluation of the issues and alternatives.

Based on our review of the limited evaluation to select the park areas and last year's program, we do not believe a day-use pass program is the right tool to manage visitation. We are disappointed to see it move forward again this year. We would like to make the following recommendations:

1. We encourage BC Parks to develop a transparent process for how decisions like these are made. To ensure visitor management policies are as effective as possible, we strongly suggest that BC Parks consults with key stakeholders and rely on research, best practices and a systems approach to guide this important work.
2. BC Parks has several management tools at its disposal to manage visitation and recreation use, including increasing the supply of trails already identified in approved management plans, closing parking facilities when capacities are reached, and re-opening as space becomes available, advertising trails that are underutilized and advertising crowded conditions. Passes as a tool should only be applied following the development of a robust visitor management strategy and after other direct and indirect management measures have been attempted.
3. While the population has been growing along with an interest in park visitation, BC Parks has not increased its inventory of trails for several decades. By addressing the lack of supply of key recreational infrastructure, park users will have a better chance at dispersing throughout the parks system. The first step would be to look for approved trails and day-use areas in existing management plans and to complete outstanding park management plans, including the plan for Pinecone Burke Provincial Park.

Thank you for allowing us to provide input into the evaluation of the day use pass pilot.

Sincerely,



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