

**Bulkley Valley
Community Resources Board
Box 985
Smithers BC V0J 2N0**

May 13, 2010

Kevin Eskelin
District Recreation Officer
Ministry of Tourism, Culture and the Arts
Bag 6000 – 3333 Tatlow Rd
Smithers BC V0J 2N0

Re: File No. REC 135416

Dear Mr. Eskelin:

The Bulkley Valley Community Resources Board has reviewed the application from the Smithers Mountain Bike Association to further develop and enhance mountain biking trails in the “Seymour” area of Hudson Bay Mountain for consistency with the Bulkley Land and Resources Management Plan (LRMP). We can offer only qualified support for this application. Our concern is outlined below.

The area of the proposed development is included in sub units 10-4 and 10-3 in the LRMP and Special Management Zone 2 in both the LRMP and the Bulkley Valley Sustainable Resource Management Plan (SRMP). The SRMP (p. 4) identifies public recreation, encouraging hiking opportunities and non-motorized access as some of the highest priorities for this area. However, a portion of the area has been designated as a core ecosystem and we are concerned about the negative impact of an expanding system of trails through the core ecosystem as proposed in this application as well as the cumulative negative impacts from a series of developments. The system of functioning core ecosystems is one of the greatest strengths of the LRMP. Thus, where this proposal overlaps the core ecosystem, we:

- 1) Support designation, upgrades that do not require widening or other significant habitat disruption and maintenance where existing trails already cross through the core ecosystem.
- 2) Do not support designation and construction of new trails through the core ecosystem unless appropriate compensation is made. Compensation should meet the objectives of core ecosystems as outlined in the LRMP and should be agreed to by Ministry of Forests and Range and Ministry of Environment. An example of a compensation process for ecosystem networks which include core ecosystems is provided in the Bulkley Valley Sustainable Resource Management Plan (SRMP) on p. 53.

We are pleased to see that the Smithers Mountain Bike Association has consulted with and received endorsement from both the Smithers Community Forest Society and Wetzin'Kwa Community Forest Corporation. The LRMP states that agencies will cooperate with the Smithers Community Forest Steering Committee in future planning for Sub-unit 10-4; although names and structures have changed since the LRMP was developed, the direction in the LRMP has been met.

However, we are disappointed that there is no reference to the LRMP in this application. This proponent has submitted previous applications that highlight relevant LRMP zoning and objectives so is clearly aware of the importance of higher level plans in directing land use in the Bulkley Valley. We urge government agencies to require that all development applications refer to the LRMP.

Sincerely,

Greg Storie
Chair, Bulkley Community Resources Board

Cc Karen Diemert, Ecosystems Section Head, Ministry of Environment, Smithers
Jane Lloyd-Smith, District Manager, Skeena Stikine Forest District, Smithers
Glen Buhr, Stewardship Forester, Skeena Stikine Forest District, Smithers
Fred Oliemans, Land & Resource Team Leader, Client Services Planning, Integrated land Management Bureau, Smithers
Liz Williamson, Section Head, Crown Land Adjudication, Integrated land Management Bureau, Smithers