

**Bulkley Valley  
Community Resources Board  
Box 577  
Smithers BC V0J 2N0**

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May 26, 2009

Rick Keim, R.P. Bio  
Ecosystem Biologist  
Skeena Region, Ministry of Environment  
Bag 5000  
3726 Alfred Avenue  
Smithers BC V0J 2N0

Re Review and Comment of Telkwa Caribou Herd Proposed Wildlife Habitat Area #6-153

Dear Mr. Keim:

Thank you for the referral package dated March 6, 2009 and subsequent presentation regarding the Telkwa Caribou Herd Proposed Wildlife Habitat Area #6-153. The Bulkley Valley Community Resources Board (BVCRB) has reviewed this referral package and has the following comments (note these comments pertain only to the Bulkley TSA).

The Bulkley LRMP and subsequent Higher Level Plan direction in 2000 and 2006 confirmed broad based management direction toward forest retention targets for the Telkwa caribou herd. These targets were to be considered within the identified 10% timber volume "LRMP Budget" in the Bulkley TSA. The background information provided does not appear to adequately address the impacts of the proposed Order on this 10% LRMP budget. We would ask that MoE confer with MoFR-Skeena-Stikine District to perform the appropriate analysis to determine the impacts of this Order on the Bulkley TSA as a whole and present the results to us.

Given the stated significance of retention of additional older forest types within the SBS BEC zone portions of the Caribou Recovery Herd Area, and given the above average forest health issues (e.g. mountain pine beetle) related to these specific timber types, the information provided does not appear to address how forest health will be managed.

The BVCRB recognises that management of the Telkwa Caribou Herd is identified in the Bulkley LRMP and is a laudable goal. Although we are supportive of this initiative, the current proposal is asking us to consider landbase trade-offs without sufficient information on the impacts to the entire Bulkley TSA. As such, when an impact analysis has been completed we would be happy to discuss the results with you.

Yours truly,

Greg Storie  
Chair, Bulkley Valley Community Resources Board