

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

January 8, 2008

Liz Williamson
Senior Land Officer
Bag 5000
ILMB Smithers, BC, V0J 2N0

Dear Ms Williamson,

RE: D. Lychak Enterprises Ltd. application for Extensive Agriculture, file #6407918

Thank you for the opportunity to comment on this application. The Bulkley Valley Community Resources Board (BVCRB) is the custodian of the Bulkley Land and Resource Management Plan (LRMP). We assess such applications as this for their conformance to the plan. We understand that the Extensive Agriculture application will eventually result in this land becoming private land.

This application covers land that is in the plan area in the Glacier Gulch Special Management Zone (SM2). Management direction from the LRMP for this neither favours nor prohibits agricultural production as a use, but other considerations dominate.

From the Bulkley LRMP - March 1998:

"2.2.2.2 Special Management Zone 2 (SM2)

Areas designated as SM2 Zones allow industrial activity. Industrial activities will be carried out sensitively to ensure that impacts on identified values, such as visual quality, wildlife habitat, recreation or sensitive soils, are minimized. Where impacts occur they will be mitigated through agency review and approval processes.

These SM2 areas will be included in landscape level planning with resultant detailed management prescriptions for each zone. These plans will be presented to the Board, agencies and public for review prior to implementation." - page 41.

For the Glacier Gulch Special Management Zone there is an emphasis on visual quality, water quality and recreational access - page 92.

From conversations with you regarding this application, we understand that this area was part of a larger recent arability study, and that some of the area applied for was deemed non-arable. Further, that as much of the non-arable areas will be removed from the application as possible. We support removing non-arable land from the application if possible.

We understand that recreationalists use the area as an access point for recreational activities on Mount Evelyn. We understand you have met with these recreationalists and have addressed their concerns. Maintaining recreation access to crown lands is a major concern on the BVCRB.

The information provided with this application regarding visual quality and water quality is not adequate for us to fully assess the conformity of this proposal to the plan. The maps provided with this application show several watercourses within the application area. The BVCRB is concerned about water quality, both for fish and for any potential water licence holders, and fish habitat. These watercourses feed into Toboggan Creek an important fish-bearing stream. As such, we recommend that these watercourses be removed from the application area along with a buffer on each side of the creek, or that appropriate covenants be placed on the title to protect the watercourses. A joint review in the field with staff from the Ministry of Environment and the applicant would be useful in determining the final boundaries of these buffers.

Sincerely,

Adrian de Groot, Chair
Bulkley Valley Community Resources Board