

January 30, 2009

District Manager  
Ministry of Forests  
Skeena-Stikine Forest District  
Bag 6000  
Smithers, B.C.  
VOJ 2N0

**Attn: Barry Smith, R.P.F., District Manager**

**Re: Resource Constraints in the Bulkley Timber Supply Area**

Dear Barry:

The Skeena-Stikine District, more specifically the Bulkley Timber Supply Area, has a long and complex land use planning history. The present set of objectives set by Government (HLPO 2006) has produced good results in terms of local resource use and its impact on the land base. This success in part is due to community and stakeholder involvement in the consensus management direction and the subsequent Land and Resource Management Plan and Landscape Unit Plans.

A key component of licensee "buy-in" of the above mentioned plans was the concept of an "LRMP Budget" as related to timber supply constraints. The following is a quotation from the preamble to the HLPO 2006; "Where objectives were established to meet a special management intent and where this caused greater impact to the timber supply in one area, objectives were modified elsewhere in the plan to lighten timber supply impacts, always with the goal of maintaining the 10% ("LRMP Budget") accepted timber supply impact. In the future, when new objectives and/or additional resource constraints are being contemplated, the LRMP Budget will be considered and the goal will be to keep cumulative impacts to less than 10% for the Bulkley TSA".

We have a growing concern with regard to the maintenance of the "LRMP Budget" when we hear of initiatives such as:

- Research Branch pursuing a GAR order to constrain harvest around research installations (leading to a greater constraint than in the past).
- Ministry of Environment implementing/advocating practices in the WHMA portion of the Ag/Wild zonation which are highly constraining on timber extraction.
- Ministry of Environment advocating a forthcoming Telkwa Caribou WHA which will be more constraining in terms of old forest retention levels.
- Ministry of Forests posting a Visual Landscape Inventory which differs from that in the Landscape Unit Plans. This inventory shows established Visual Quality Objectives and recommended Visual Quality Classes which are each more constraining than what is approved.
- Ministry of Forests proposing an expansion of the Woodlot Program

Each of these initiatives poses a potential timber supply constraint. Each of these initiatives has been initiated by specific interest groups within agencies. Our opinion is that each of these initiatives has progressed too far without the same level of consultative effort that made previous planning initiatives in this TSA successful.

Rather than asking that each of these specific initiatives be addressed with a response to PIR, we request that the Ministry of Forests' continued commitment to the "LRMP Budget" be verified. Furthermore, we suggest that those agencies that have a planning role in this TSA be reminded of the Bulkley TSA planning framework and the "LRMP Budget".

As a long term stakeholder in this TSA, we remain committed to participating in planning for resource management and setting or contributing to resource objectives. Continued planning initiated with broad involvement will yield the best results and will be more likely to garner consensus support.

Yours truly,

Pacific Inland Resources

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Gord Gunson  
Woods Manager

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pc Jane Lloyd-Smith, Operations Manager, Skeena-Stikine Forest District  
Greg Storie, Chairman, Bulkley Valley Community Resources Board