

# **Bulkley Valley Community Resources Board**

PO Box 985 | Smithers, BC | V0J 2N0

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December 19, 2014

Jocelyn Campbell  
Ecosystems Biologist, Skeena Region  
Resource Management Division, FLNR

## **Re: Proposed Wildlife Habitat Area (WHA 6-333) for Telkwa Caribou in the Bulkley and Morice TSAs**

Dear Jocelyn,

Thank you for meeting with the Bulkley Valley Community Resource Board (BVCRB) on October 21, 2014 in Smithers, BC and for presenting the proposed Telkwa Caribou WHA.

The Bulkley Land and Resource Management Plan (LRMP) and subsequent documents provide the best currently-available summary of consensus public values for the Bulkley portion of the caribou range. The BVCRB is a volunteer group representing a balance of 12 diverse community perspectives. Since 1998, the BVCRB has served as a steward of the land-use direction articulated in the LRMP.

We have completed a preliminary review of the information that you presented at the meeting and are prepared to offer some initial comments and ask some questions. These comments are limited by several factors:

- We were not presented with an assessment of the probability of success comparing the status quo (LRMP and Telkwa Caribou Herd Recovery Plan strategies) with the provincial WHA proposal and the federal recovery strategy.
- As a volunteer board we have limited resources available to us. These comments therefore reflect the knowledge and experience of those present on the Board.
- We operate on a consensus basis. These comments therefore reflect the common values of all members on the BVCRB.

## **Summary of BVCRB Response**

The BVCRB is concerned that the current WHA proposal has not sufficiently addressed all the relevant factors to give us confidence that the caribou herd will recover and sustain itself. Namely, it focuses on land use and it doesn't appear to deal adequately with recreational access management and predation. If the WHA incorporated these two factors, the socioeconomic implications would be important to consider because we are concerned that other LRMP values would be compromised.

# Bulkley Valley Community Resources Board

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The BVCRB cannot provide unconditional support to the WHA proposal because of the issues described within this submission. We can provide **conditional support based on satisfactory answers to the questions posed**; that is, we support the concept of a WHA as part of an effectively-designed strategy that also addresses access control and predation, given that other LRMP values are not put at undue risk.

## Existing Direction

The LRMP includes an objective to “*enhance and sustain a viable caribou population*” in the Telkwa Planning Unit (p 97). To achieve this objective, the LRMP defines Special Management Zones (Howson Range and Hankin Plateau as SM1 with no timber harvest; Mooseskin Johnny Lake as SM2 with “low impact management”), core ecosystems and landscape corridors, calls for a comprehensive plan to sustain a viable caribou population, and presents strategies to maintain caribou habitat and to restrict motorized access as required. The subsequent Telkwa Caribou Herd Recovery Plan (TCHRP) includes direction to augment the population, develop a recreational access management plan and modify industrial activities to complement recovery. The Telkwa Landscape Unit Plan includes a series of more specific objectives and strategies designed “*to integrate forest harvesting practices and caribou recovery*” (p 17, Objectives 2.5 – 2.10; Table 7 of the plan lists harvesting and access strategies for Key Forested Caribou Habitat, ESSF and SBS forest).

## Success to Date

The LRMP direction and TCHRP plan have failed to achieve the publicly-defined LRMP objective of sustaining a viable caribou population. Indeed the population has declined precipitously. The BVCRB agrees with the Section 7 Notice and GAR tests that current management strategies are not sufficient to maintain the Telkwa caribou population.

We remain unclear about causal mechanisms: while we recognize that effects are likely cumulative, it would be helpful to have an assessment of likelihood of success in relation to land use policy, recreation, climate change, predation, emigration, disease, or other factors.

## Proposed Direction

Due to the ongoing deliberation on whether the Telkwa caribou herd is part of the northern or southern population, we have reviewed the Telkwa WHA proposal and have also attempted to compare the proposal to the SARA Recovery Strategy for the Woodland Caribou, Southern Mountain Population (Environment Canada 2014). See Appendix 1 for a tabulated summary.

## *Federal Caribou Recovery Strategy*

The Federal Caribou Recovery Strategy represents the best current knowledge about how to maintain the southern mountain caribou populations. The recovery strategy notes that the most significant threat to caribou is increased predation resulting from habitat alteration due to industrial activities. Moose respond to the increased young seral habitats; predator populations increase in response to the higher prey abundance and kill caribou opportunistically. Linear features associated with industrial and recreational activities also increase predation risk.

The federal recovery strategy provides the following performance indicators:

- 1) For low elevation winter ranges, maintain at least 65% of range as **undisturbed habitat** that includes the biophysical attributes needed
- 2) For high elevation winter and summer ranges, maintain the undisturbed habitat that includes the biophysical attributes needed
- 3) For matrix range, maintain the biophysical attributes and/or management actions needed to maintain wolf densities  $< 3/1,000 \text{ km}^2$  (which equates to  $< 8$  wolves in Telkwa WHA)

We understand this strategy to mean that all high elevation range should be in a “no-harvest zone” and that only 35% of low elevation winter range is available to harvest. The federal strategy does not determine a seral stage distribution, but calls for “undisturbed habitat”. The federal strategy does not specify indicators for access, but does note that human access can increase predation risk and hence destroy critical habitat.

## *Provincial WHA Proposal*

The Provincial strategy includes considerable local expertise and includes trade-offs among values. The proposal, as presented by Jocelyn Campbell, and as described in the WHA#6-333DraftOrder\_ver2 provides the following strategies:

- 1) Definition of a no-harvest zone
- 2) Seral stage strategies for forested zones beyond the no-harvest zone ( $> 60\% > 80$  years and  $< 28\% < 40$  years in ESSF and SBSmc;  $> 45\% > 80$  years and  $< 39\% < 40$  years in the SBSdk)
- 3) In-block retention (no target amount)
- 4) Minimize accessible roads; deactivate  $< 2$  years.
- 5) Less-specific strategies for Mineral Exploration (mostly prefaced by “to the extent practicable...”)

WHA objectives include

- 1) maintaining forests that
  - a. contain characteristics consistent with near natural-disturbance patterns by BEC zone
  - b. support a long-term supply of lichen forage
  - c. provide security cover

# Bulkley Valley Community Resources Board

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- 2) designing forest activities to provide for
  - a. large areas of inactivity over a rotation
  - b. avoidance of caribou displacement, by reducing human, caribou and predator interaction.

The WHA no-harvest zone includes the LRMP no-harvest SM1 zones, includes several core ecosystems, adds important travel corridors between the two SM1 zones (partly within the existing SM2 zone), adds most of the key forested areas defined by the TCHRP, adds landscape riparian corridors, and fills in areas between these zones to create a consolidated polygon. The BVCRB agrees that the shape makes sense in terms of capturing many important habitat features and decreasing the potential for fragmentation.

The BVCRB sees some strong advantages to the WHA proposal. For example, WHA designations must be considered when deciding about oil and gas activities

However, we also have concerns. We are uncertain about the probability of success at achieving the LRMP objective of sustaining a viable caribou population for several reasons—and would like answers to some of our questions to help us decide whether to support the proposal.

- 1) Does this plan capture all of the **high-elevation winter and summer range** (as called for by the federal strategy)? If not, how does the plan propose to maintain the value of excluded range?
- 2) In the **low-elevation range**, how do the seral stage targets compare with the 65% undisturbed indicator included in the federal strategy? These strategies are not interchangeable: in one case (federal), large areas will remain undisturbed, with no new access and with a natural age-class distribution; in the other (WHA), all of the area will be harvested, with associated road-building and loss of oldest age stands and trees, potentially loss of conditions that favour epiphytic lichen abundance. How will the seral-stage strategy manage to provide the values of undisturbed forest?
- 3) **Access control** is challenging. Flights over the past few years have documented and mapped motorized recreational access in non-motorised areas. How will this proposal improve access control? Deactivation is an important strategy, but may not be successful at preventing access by off-road vehicles.
- 4) Are there **sufficient funds and staff** to support and monitor the programme over a long enough time period? The BVCRB agrees that the effectiveness of any caribou recovery strategy will hinge on long-term support and monitoring. Currently the budget for managing and monitoring the Telkwa caribou has been completed on a year-by-year basis. Stable long-term funding is required. Without a long-term budget, how does the Provincial Government propose to monitor and respond to changes in caribou status or to the suite of indicators included in the federal caribou recovery strategy? At the very least, we believe that funding must be in place for the 5 year evaluation period. The

# Bulkley Valley Community Resources Board

PO Box 985 | Smithers, BC | V0J 2N0

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BVCRB cannot support an under-funded and under-staffed strategy because we believe that the probability of success in achieving caribou objectives will be even lower.

- 5) How will government assess the success of the programme over 5 years? Are there targets for minimum numbers or for an increasing population trend? The BVCRB would like to ensure that if targets are not achieved within 5 years, limitations are withdrawn.
- 6) Because of the requirement to find an offset to the loss of timber harvest, we are concerned that **other LRMP values** will be impacted by the WHA. For example, if areas currently restricted to achieve biodiversity objectives are opened to timber harvest, biodiversity will essentially be paying for caribou. Ethically and logically, there seems no reason to assume that one LRMP value should trump others. If timber cannot be impacted to achieve a caribou WHA, neither should biodiversity be impacted. Conversely, if the marginal benefit to caribou is sufficiently high, all values could share the cost.
- 7) What is the interaction between the WHA and any proposed coal mine?

The BVCRB needs an estimate of the probability of success so that we can assess the relative benefits to caribou and costs to other values. Can you provide us with an assessment of the probability of success over time for the status quo LRMP/TCHRP, versus status quo plus WHA versus status quo plus federal recovery strategy, considering the likelihood of successful access control and impacts of climate change? We would also like to see an analysis of impacts to other values (including socioeconomics and biodiversity).

Thank you for the opportunity to comment. We look forward to your answers to the questions that we have posed within this letter.

Regards,



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Mike Sawyer  
Chair, Bulkley Valley Community Resources Board

Cc:

Len Vanderstar, Ecosystems Biologist, Smithers, FLNR

Jevan Hanchard, District Manager, Regional Operations, Skeena Stikine, Smithers, FLNR

Tony Pesklevits, Director, Resource Management, Skeena, Smithers, FLNR

Eamon O'Donoghue, Regional Executive Director, Skeena, Smithers, FLNR

# Bulkley Valley Community Resources Board

PO Box 985 | Smithers, BC | V0J 2N0

## Appendix 1. Comparison of LRMP/TCHRP, federal recovery strategy and provincial WHA proposal

Note that this is rough, based on the information and maps readily available rather than on a quantitative scenario model and analysis. Strategies are not easily comparable. BVCRB would like to see a quantitative comparison completed by the province to help us understand the differences among the 3 approaches.

Factor	LRMP/TCHRP	Federal RS	Provincial WHA
<b>No-harvest zone</b>	SM1, core	All high elevation range	Adds some of the SM2 to the SM1 and fills in some small areas around LRCs including some key forested habitat. Unclear how this relates to all high elevation range.
<b>Partial harvest</b>	Key forested habitat	All low elevation winter range	Some key forested habitat included in no-harvest zone; some not.
<b>Amount undisturbed outside no-harvest zone</b>	No target, assume 0%	>65%	No target, assume 0%
<b>Amount mature + old</b>	50% > 90 years in key forested habitat polygons	No target, will depend on natural disturbance—but some will be much older than 80 years.	60% > 80years for SBSmc and ESSF; 45% > 80 yrs for SBSdk. Note, 80 years is not usual def of M + O for these ecosystems (100 for SBS, 120 for ESSF)—and > 80 is insufficient for epiphytic lichens
<b>In-block retention</b>	Calls for 50% key forested habitat, 30% in ESSF, 20% SBS—but practice is standard 1-3% for ESSF and 2-7% for SBS with adjacent bit postponed for 40 years.	Biophysical elements important to caribou (unclear what this will mean in total %)	Key caribou habitat features (unclear what this will add—how much “mature forest” and how many “trees with lichens”?; wetland screening probably already included in riparian buffers
<b>Access mgmt</b>	Voluntary	No targets beyond “undisturbed”; activities that destroy critical habitat include activities that facilitate predator access or displace caribou. Calls for CE study and action plan.	Deactivate, no roads < 1km from alpine
<b>Predator mgmt</b>	No target	< 3 wolves/1000km <sup>2</sup>	No target