

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

November 24, 2007

John Stevenson, Land Officer  
Integrated Land Management Bureau  
Bag 5000  
Smithers, BC, V0J 2N0

**Re: Cybernet Communication's application for a license of occupation for four radio tower sites**

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 Resources Management Plan (LRMP). We assess such applications as this for their compatibility with the LRMP.

Since the LRMP is a plan developed by the community regarding activities on Crown Land we expect development activity to conform to the plan. Necessarily, the process of assessing compatibility needs to take place in advance of development. We understand that two or three of the proposed four sites have already been developed. Quite apart from the intrinsic issues that arise from each site's proposed (or actual) use is the potential for precedent in deciding how to deal with the fact that development has taken place first with approval sought later.

If an approval is given retroactively to the established sites a strong precedent may be set for other users of Crown Land to do likewise. We see this as a move that would weaken the effectiveness of the Plan. Other existing or future tenure holders may see that there is not a level playing field, or that conformance with the Plan is not needed. This is a key issue raised by this application.

The information provided is scant and is not adequate for a complete discussion of the merits of the application. The Blue Pearl site is said to need a two hundred metre access trail through the bush, but does not give detail if this is a motorized or foot trail, or to what standard the trail will be built, or if an assessment been done for erosion or water quality concerns downstream as the area is in a community watershed. New trail construction may provide recreational access inappropriately, even if unintentionally. On the site that requires trail construction, details on how access will be managed are needed.

Towers near the airport may need navigation warning lights. Visual quality concerns arise with some hillside developments. We have no information about conformance of this application to applicable standards or if addition lights will be required on the side of Hudson Bay Mountain.

Biodiversity conservation is a concern of the Board. Alpine ecosystems are fragile and we would like to see an awareness of such issues reflected in the information provided.

We would welcome more information on these points and would be better able to make a determination of conformance to the LRMP if we have it, before next meeting on December 11<sup>th</sup>, 2007.

Sincerely,

Adrian de Groot  
Chair, Bulkley Valley Community Resources Board