

Subject: BCTS 2023-2028 Proposed Bulkley FSP  
Date: 2023-04-20 15:15  
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Greetings Curtis,

Below are my comments pertaining to your proposed FSP for your perusal and consideration. I thank you for the opportunity to provide comment.

Landscape Corridors 2.1.3.1.1., p.12:

TSM will not authorize harvesting within a Landscape Corridor that would result in a condition where more than 30% of the width of the Landscape Corridor is younger than 80 years old. This is a great addition that was reflected in previous FSPs since it better considers the concept of habitat connectivity, which is the fundamental purpose of the LCs.

To this day, forest licensees have not adequately reflected the management direction that was agreed upon by the CRB, Forest Service and forest licensees as part of the Landscape Unit Planning Process. Myself, Rick Braam and Jane Lloyd-Smith can testify to this. Each of the 12 Landscape Unit Plans specify management direction for different forest types. BCTS continues to apply the pine type mgt. strategy to all forest types; this is clearly not what was agreed upon. For example, single tree or group selection was to only occur in spruce/balsam stands with good quality varied stand structure, of which is generally the case for such stands targeted for harvesting. To preferential select what components of a consensus agreement to implement and not implement makes a consensus agreement obsolete.

I believe that the CRB has raised this concern before, but I am not aware of the outcome of such discussions.

Mountain Goat 2.2.2, p. 16-17: Result & Strategy 5 is a deviation from the GAR Order GWM 5 with respect to road deactivation. It is important that the legal GAR Order is followed and the FSP does not "counsel an offence" by creating a different legal direction once it is signed off. [https://www.env.gov.bc.ca/wld/documents/uwr/u-6-007\\_ord.pdf](https://www.env.gov.bc.ca/wld/documents/uwr/u-6-007_ord.pdf)

Agriculture/Wildlife Zone 2.5, p. 27: This section is contrary to the yr. 2000 HLPO, appendix 2. Careful read of the HLPO speaks to footnote 10: Specific provisions for maintaining these values will be determined through stand level development strategies. These strategies are the agreed upon mgt. direction (attached below) and recently confirmed by the Skeena-Stikine NRD to the TSA Steering Committee (see e-mail below). Most importantly, the intent is that forestry activities within a WHMA is to be initiated by the Conservation Lands Ecosystems biologist, not a forest licensee, and only for the purpose of wildlife habitat maintenance/enhancement. BCTS

is misinterpreting the intent by treating WHMAs as a timber basket ... it is far more than simply minimizing conflict to wildlife since the objective also speaks to protecting valued wildlife habitat. There is a reason why woodlots are not placed within the WHMAs; the same reason applies to all forest licensees .. forestry is considered a management tool to assist in meeting desired habitat conditions.

We were in process of transferring authority of the WHMAs & F&W Reserves from the Land Act to the Wildlife Act when Mr. Bobby Love (Authorizations Manager), cancelled them from the Land Act on April 19, 2019, without any consultation with parties that got them established in the first place. If the transfer of authority occurred or an alternate long term conservation designation was established for these land parcels, then the land parcels would have shifted from being non-administered conservation lands to administered conservation lands, making provincial conservation lands funding available for purposes such as management planning. It is not the authority of a forest licensee to develop a cutting permit in a WHMA for review by a conservation lands gov't biologist; this is too piecemeal an approach.

What BCTS should be doing is support long-term legal designation of these conservation lands such that money can be made available to conduct proper management planning, thus having everyone on the same song sheet instead of the conflict that now exists today. This would create a win-win situation instead of the loose-loose situation that we now find ourselves in.

I perceive that what is currently written in the proposed BCTS FSP as Results & Strategies 1 is contrary to the direction provided by the Skeena-Stikine NRD to the TSA Steering Committee. Let's see what comes out of our collective meeting that Kevin Partington, BCTS's Operations Manager is arranging so that we can collectively come to a mutual understanding regarding this topic of concern before finalizing the BCTS FSP.

Len Vanderstar

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Further referencing an email to foresters...

Ag/Wild Zone parcels are now a subset of an overall Skeena Region conservation lands file managed by the Ministry of Water, Lands, and Resource Stewardship (WLRS) and special management considerations pertain. It is expected that licensees will reach out to WLRS prior to planning any development in these areas. If applying for a cutting authority that overlaps one of these Ag/Wild polygons, please clearly state in the application letter that you have been in contact with WLRS regarding the proposed development. Contacts at WLRS are Jennifer Atkins (Jennifer.Atkins@gov.bc.ca) and Chris Schell (Chris.Schell@gov.bc.ca, (250) 876-7075).