

File 2020-1  
Nov 18, 2020

To: Geoff Recknell  
Regional Executive Director  
Skeena Stikine Natural Resource District,  
Ministry of Forests, Lands, Natural Resource Operations and Rural Development.

From: Bulkley Valley Community Resources Board.

Re: Agricultural/Wildlife Zone – Wildlife Habitat Management Areas (WHMAs)

Dear Geoff:

We write this letter to you seeking clarification and or the rationale around the recent removal of Section 17 and 16 conditional withdrawals related to the Wildlife Habitat Management Areas (WHMAs) and Fish and Wildlife Reserves contained within the Agricultural/Wildlife Zone of the Bulkley Valley LRMP, and we seek information as to what government policy or procedure will replace the section 17 and 16 notation ensuring these features are managed as per the intent of the land use plan. If further work is required by the CRB to assist with the proper legal establishment of WHMA areas we request that you connect us with the appropriate regional staff.

It is the understanding of the CRB that in March 22, 2010, Section 17 notations were established by the Ministry of environment as per the guidance written into the Bulkley Valley Sustainable Resource Management Plan (BVSMP) Approved Jan 26, 2006. Since then, one or more S.17 designations were upgraded to S.16 Land Act Reserves. In that plan the objective for the Wildlife Management areas was stated as such on page 33:

*6.3 Wildlife Habitat Management Areas:*

*Ensure the protection of wildlife and wildlife habitat in Wildlife Habitat Management Areas (WHMAs) while allowing forestry, grazing, recreation and infrastructure development where compatible with wildlife and habitat conservation objectives.*

*Strategies*

- 1. Land and Water British Columbia (LWBC) will establish Notation's of Interest over the WHMAs.*
- 2. WHMAs will not impact existing grazing permits, and licenses.*
- 3. WLAP may designate suitable areas within the WHMA Subzone as Ungulate Winter Range (UWR under FRPA) to provide direction to Forest Stewardship Plans.*

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4. *Integration of forestry and grazing activities in WHMAs and UWR will occur where appropriate and compatible with wildlife and habitat conservation objectives.*
5. *Infrastructure development may occur where compatible with wildlife and habitat conservation objectives.*
6. *Integrated use for recreational activities is permitted where compatible with wildlife and habitat conservation objectives.*
7. *WLAP will provide management measures for red and blue-listed, sensitive and vulnerable, and regionally significant species, plant communities, and ecosystems.*

Over the course of the previous year, members of the CRB learned that the Region was undertaking a process to review various land act designations across the region, reconciling them with rationales and removing them if they no longer had a valid rationale, or were improperly established. In this process we understand that the WHMA areas identified by the 2010 order were removed. Bobby Love, Regional Director of Authorizations gave a presentation at our September meeting to explain the process, and in a subsequent email informed us that the Section 17 areas were improperly established, and that we should contact the Resource Management Division at the region to start the correct process to identify them as WHMA areas under the wildlife act or other designation.

The CRB did understand that S.17 may not be the best designation for these parcels; hence our previous letter of support for the Transfer of Authority of S.16 (Fish and Wildlife Reserves) and S.17 (Wildlife Habitat Management Areas) Land Act designations to WHA (Wildlife Management Area) designation under the Wildlife Act (see attached letter). It is the Board's expectation that your Ministry re-instate a legal designation for the WHMAs as soon as possible. Options may include Land Act Reserve, an Objective Set by Government under LUOR, or a Wildlife Management Area.

In the interim, the CRB is concerned the lack of designation may compromise the WHMAs until such time as some new form of designation is established. We request that any proposed plans in these areas be required to demonstrate compliance with the SRMP objective above.

Sincerely,



Chair  
Bulkley Valley Community Resources Board.

PC: Jevan Hanchard, Bobby Love