



## Bulkley Valley Community Resources Board, BVCRB

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Mail: Treasurer Ron Vanderstar, 11565 Old Babine Lake Road,  
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To: Hon. Randene Neill, Minister of Water, Lands and Resource Stewardship ([WLRS.minister@gov.bc.ca](mailto:WLRS.minister@gov.bc.ca)),

Hon. Ravi Parmar, Minister of Forests ([FOR.Minister@gov.bc.ca](mailto:FOR.Minister@gov.bc.ca))

(Letter submitted by email)

Feb. 23, 2025

Re: Request for review of the Bulkley Wildlife Habitat Management Areas and Wildlife Reserves

Dear Honourable Ministers Ravi Parmar and Randene Neill,

The Bulkley Community Resources Board (CRB) is a volunteer, community-based board, formed in Wet'suwet'un Territory at the completion of the Bulkley Land & Resource Management Plan (LRMP) in 1999. It provides a provincially-recognized, independent, nonlegal forum for on-going public discussions, management accountability and social license for the nine LRMP values.

The CRB is requesting that:

- 1) **WLRS** reinstate the temporary Land Act protection, cancelled in 2019-20, for the Skeena Region Wildlife Habitat Management Areas (WHMA) and the pre-LRMP wildlife reserves.
- 2) **MOF support this by overlapping forest-harvest protection as Designated Areas (Forest Act S. 169) to halt all resource development and tenure issuance on the WHMAs and unformalized Wildlife Reserves (cancelled Lands Act S 16s) until the conservation issues are resolved.**

The WHMAs were agreed upon by consensus during the LRMP. They were then given legal status under a Higher-Level Plan Order (2000) and given temporary protection under the Lands Act in 2010, pending finding a permanent, legal status and developing conservation-focused management plans. The most *effective* legal, spatial designations for conservation lands are Wildlife Management Areas under the Wildlife Act, or possibly Indigenous Protected and Conserved Areas.

**As background:** the Lands Act S16/17s cancellations happened as an apparently over-zealous Lands administrative review of "un-needed" parcels and without the same consultation standards as all other regions in BC. In 2018 the Crown Land Conservation Partnership Program process, under the provincial Conservation Lands Program, was under way to co-ordinate the orderly transfer of Crown Lands Act S 16s and 17s with 'wildlife or conservation purpose', to the Wildlife Act for *Wildlife Management Areas*. The protection was cancelled in 2019 and 2020 with no consultation with CRB, public or First Nations and against 2016 conservation personnel recommendations.

As a result, the spatial files disappeared from provincial land-status sites. Although still legal under the LRMP, developers cannot see any restrictions on development when checking land status. For example, BC Timber Sales is proceeding with road and harvest planning on the largest WHMA (**Tyhee Mtn**), which includes deferred Old-growth Areas. They were quoted in Interior News as having CRB support, which

was refuted by CRB. The LRMP WHMAs, and wildlife reserves agreed to through previous planning processes, allow for limited, compatible forest treatments only if in a legal **Wildlife Management Area** conservation-management plan. A commercial BCTS Timber Sale sets a negative precedence for disregarding previous, legal designations and direction.

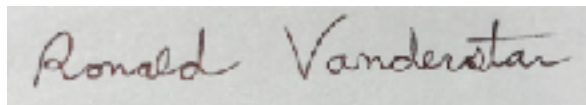
The previous Minister **Nathan Cullen (FLRNO)** encouraged participation in the Bulkley-Morice Forest Landscape Planning (FLP) process to reinstate the conservation lands, however this will likely be too late. It is important to follow the direction of the existing Higher-Level Plan and LRMP, to maintain the integrity of the WHMAs in the meanwhile. The LRMP is still the legal, consensus document and direction. Its scope covers *all* resources, not just forestry. The FLP however, is a *subset* under the LRMP, focused on forestry. It is critical for public trust and government credibility to reinstate the temporary protection for all Crown Lands being considered for transfer to Wildlife Act, under the Procedures for Lands with Conservation Value (link) S 4.3.1, pending a decision on the Wildlife Management Area package proposal.

In summary, the CRB recommends:

1. There be solid public and First Nations consultation on the Wildlife Management Areas or Indigenous Conserved and Protected Areas process.
2. Temporary protection for all cancelled Lands Act S16 and S17s as a S16, as recommended by Procedures for Crown Lands S4.2.1 (e.g. roads, gravel pits and other land tenures).
3. Forest-harvest protection as Designated Areas (S.169 under the Forest Act), to halt all resource development and tenure issuance on the WHMAs and unformalized Wildlife Reserves (cancelled Lands Act S16) until the conservation issue is resolved.

This would help build public trust in process and provide a sounder biodiversity foundation for Forest Landscape Planning processes.

Sincerely,

A handwritten signature in dark ink, reading "Ronald Vanderstar". The signature is written in a cursive, flowing style.

Ronald Vanderstar, Treasurer, BCRB

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