

April 30, 2025

via email: Wayne.crossland@gov.bc.ca

Wayne Crossland
Land and Resource Coordinator
BC Caribou Recovery Program
Ministry of Water, Land and Resource Stewardship, Omineca Region

RE: District of Mackenzie Comments with regard to UWR #u-7-001 and WHA 7-018

Dear Wayne Crossland,

Thank you for your presentation and discussion during our Regular Meeting of April 14, 2025 and the telemetry data package shared afterwards. Council greatly appreciates the opportunity to provide feedback on the following two proposals located within the Mackenzie Natural Resource District:

- Ungulate Winter Range proposal for Southern Mountain Caribou (UWR #u-7-001)
- Wildlife Habitat Area proposal for Southern Mountain Caribou (WHA 7-018)

The District supports, in principle, the intentions of these two initiatives with respect to caribou recovery. However, the District does have concerns with how these proposals will impact the local forest industry, which is the backbone of our community's economy, as well as whether there is sufficient scientific support for these proposals as written. The following provides our community context, our comments and concerns, along with two suggested changes that the District feels would better support the overall goals of these proposals and alleviate some of our concerns.

Community Context

The District has been subject to a challenging economic period, primarily due to the downturn in the forest industry in the last 6 years, which has resulted in hundreds of jobs lost in our community and significant tax revenue decreases that were supporting our community's services and quality of life. As a result, Council has a keen interest in proposals being made by the Province of BC and other proponents with respect to land-use in our area and seeks to ensure that land-based decisions strike a balance and continue to support the current or a new diversified industry that will create a more viable and sustainable economy here in Mackenzie.

Proposal Comments and Concerns

From a general standpoint, access to timber near Mackenzie has already been impacted by caribou recovery efforts through:

- the Intergovernmental Partnership Agreement For The Conservation Of The Central Group Of The Southern Mountain Caribou (The Partnership Agreement);
- the expansion of the Klinse-za Provincial Park, which has eliminated forest activity along the Clearwater mainline and has almost eliminated the potential for activity along the West Parsnip mainline;
- the Nature Trust of BC;
- existing ungulate winter ranges; and
- old-growth management areas.

The Kennedy Siding herd is already approximately 50% protected through these efforts. Local industry can not afford to lose any more timber access to caribou protection without ironclad scientific backing demonstrating the criticality of the land to be protected. The District strongly expresses the need to retain access to what is left to be able to maintain a viable forest sector in the local economy.

WHA 7-018 Comments

The report says it is intended to protect low density, low elevation pine stands along the Misinchinka River. However, as seen by those who have travelled and worked in that area along with data from available public forest inventories, that area is typical of wet spruce and fir. Therefore, this goal is not being met by the proposal.

The report indicates that it is intended to protect a migration corridor, but that landscape does not match typical caribou habitat and no backing evidence has been presented to demonstrate that this area is being used by caribou. Based on the 5 years of bi-weekly imagery provided, it is apparent that the central section of the WHA proposal sees little to no use from collared caribou. The data shows some caribou use at the south end of the polygon and some more that is 'spillover' on hilltops at the north end of the polygon which are already protected by a development moratorium as part of The Partnership Agreement. There is strong suggestion of a massive flow of animals from the east into UWR 7-001 using the high-elevation ridges around Fast and Braathen Creeks with a complete avoidance of the proposed WHA. The reverse migration is very similar, but more diffuse with the same avoidance of the Misinchinka Valley. There is little use of the middle section demonstrated by the provided data. This does not support the conclusion that this area need further protection in the interest of caribou.

This area does, however, represent accessible timber, close to mills that can help support our community.

Further, by limiting disturbance in this area it becomes even less likely to develop and maintain low elevation caribou habitat since that requires a supply of mid-age pine stands which is not supported by the current condition of the forest and its development is inhibited by a lack of disturbance to the present forest types which will continue to persist in their current state

without disturbance. Even in the instance of a natural disturbance, the climate of this area is likely to give rise to the same forest again, rather than the desired pine stands.

UWR 7-001 Comments

The forest types are more suitable to the goals stated in the report, however the District is still concerned about the impact of this proposal on the local forest industry.

Suggested Changes

Bearing all of this in mind the creation of WHA 7-018 does not appear to support the stated goals. It would seem more effective to replace that proposal with the following:

- A further extension of UWR 7-001 to include the area used by caribou at southern extreme of 7-018 (see week 1 of the telemetry data shared with the District);
- An extension of UWR 7-009 to include areas used by caribou in the proposed WHA 7-018 down to an elevation of around 1000m. This would protect areas used by caribou and maintain some access for forest operations at desirable lower elevations

Conclusion

Overall, the District is in support of caribou recovery efforts within the region, however would like to see further evidence that supports the need for the additional restrictions outlined in these proposals. Restricting access in this area could have considerable impact to the local economy and quality of life of those who work and live in the region.

Thank you again for the opportunity to provide our comments and concerns. If you have any questions please do not hesitate to contact our Chief Administrative Officer, Diane Smith at diane@districtofmackenzie.ca or 250-997-3221.

Sincerely,

Joan Atkinson
Mayor