



2025-May-16

The District of Mackenzie
1 Mackenzie Blvd
Bag 340
Mackenzie, BC
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Files 36460-20/WHA 7-018
36460-20/UWR u-7-001

Attention Mayor and Council

Re: Reply to the District of Mackenzie's Comments on WHA 7-018 and UWR u-7-001

Thank you for the comments and the position statement that you have submitted on behalf of the District of Mackenzie regarding the proposed General Actions Regulation orders for Wildlife Habitat Area 7-018 and Ungulate Winter Range u-7-001. As public servants, maintaining open communication is an appropriate action while serving the people of our province and communities. In this letter, I have addressed each of the points you identified in your letter in the general order presented.

❖ Proposal Concerns and Comments

From a general standpoint, access to timber near Mackenzie has already been impacted by caribou recovery efforts through: ... The Kennedy Siding herd is already approximately 50% protected through these efforts. Local industry cannot 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.

It is acknowledged that habitat management efforts to recover caribou can have implications for both the spatial access and potentially the volume of timber available for harvest. In its determination of what should occur on the landbase, the Province of British Columbia is guided by a recognition that there are twelve resource values it must manage. These resource values include both timber and wildlife¹. The ability to align management of both these values is not easy, yet among the key elements in getting to the best available solution in each situation is to have open communication and factual data to base decision on. The Province has undertaken various programs to find the best alignment including efforts involving the areas spanned by the proposed UWR and WHA at Kennedy Siding. The 2000 Mackenzie Land and Resource Management Plan, which was co-developed by representatives of multiple sectors, including forestry, recommended the area be managed to perpetuate caribou.

In your letter you have listed some actions that have had an impact on the available timber supply. It is certain that some of these actions have benefitted to caribou. However, it should be

¹ [Understanding Forest and Range Practices Act - Province of British Columbia](#)

noted that some items on your list were driven by concerns for other resource values as well as the Province's commitment to reconciliation with First Nations and by ecological conditions. Those ecological conditions have included beetle infestations, wildfires and longer-term climate changes, each of which has influenced the Annual Allowable Cut for Mackenzie's TSA.

As regards, the statement that 50% of the herd's area has already been protected, this statement presumes that all habitat is of the same level of importance and that all legal designations are equally effective. These are not correct presumptions. Large portions of the quoted 50% involves higher elevation areas with minimal amounts of economically harvestable timber and/or minimal attributes that attract people. These high elevations areas are however, important or even critical, to caribou survival. In addition, the quoted 50% includes areas where timber harvesting has continued. This includes the original UWR u-7-001 which was authorized in 2003. Since that time, harvesting has removed almost all of the area's marketable forest and has directly contributed to the UWR having 1.24 km of road per km² of UWR. Multiple scientific studies confirm that road densities above 0.6 km per km² have significant negative impacts on caribou through increases in avoidance behaviours leading to herd fragmentation, and by increased rates of predator-induced mortality.

❖ WHA 7-018 Comments

In this section of your letter, you indicate that the area along the Misinchinka River primarily a location with spruce and fir, rather than the pine stands identified as an objective within the WHA. This is correct. During the presentation to council, it was noted that the objective has been removed from the WHA. It was initially intended to refer to the southern section of the WHA near to where the feeding station is location, which was historically dominated by dry pine forest stands. It was not intended to refer to the habitat in the upper watershed of the Misinchinka River, which does have spruce and fir stands. The wording in the proposed WHA did not adequately convey this intention. Objectives in GAR orders were originally intended to guide the development of Forest Stewardship Plans (FSPs), however Forest Landscape Planning has superseded FSPs. Because of this change and because the stated objective caused confusion, it has been removed from the proposed WHA. It will be retained in the UWR as a tool that can guide planning processes involving non-timber related activities.

This portion of your letter also notes that the telemetry data and landscape found in the upper Misinchinka River Valley does not support its use by caribou. This may be the situation, but it is still unclear. Telemetry data are static points in time with each point representing a precise minute of a single day; they do not represent movement. The location of the collared caribou during the remaining portion of each day is speculative. In addition, all collared animals are females as the placement of a collar on a female provides information on her, her calf, and on the calving area. Placing collars on bull caribou provides less information and increases the level of risk that a collared bull may have during periods such as the breeding season. The result is telemetry data provided to your council represents only the collared females and only about 1/15 of the herd. Behavioural studies demonstrate that male caribou do behave differently than females, routinely moving through and occupying landscapes that rates and during times that different from females. In addition, on-site observation of uncollared animals, their scat and

footprints within the WHA confirms its use by caribou, despite a lack of telemetry data. However, the points presented in your letter are significant enough that a review is being undertaken in conjunction with the Ministry of Forests to determine if changes should be made to the spatial area of the WHA.

❖ General Comments

In this section of your comments, you write... *there appears to be a lack of clear or rapid process to follow in case of insect outbreaks (i.e.. Mountain Pine Beetle) or wildfire in that area, which if left could have impact on the wildlife and general ecosystem supporting the caribou...*

It is fully acknowledged that forest stands are continually changing. These continual changes are one of the drivers behind the General Wildlife Measures proposed in the two orders, especially as they relate to issues like wildfire and pest outbreaks. In terms of wildfire, The Province is aware of the elevation in wildfire risk when a wilderness area contains access roads. This was exemplified in 2024 when some 42% of wildfires in the province were human-caused. Although not all of these fires originated because of access roads, the presence of roads is significant enough that the Canadian Forest Fire Behaviour Prediction System includes roads as a risk feature in its wildfire modelling processes. As regards pests, there are multiple forestry-based and ecological studies confirming that infectious disease transference increases along access roads and in conjunction with forest harvesting. These combined factors support the prohibition on primary forest activities and on new road construction within the UWR and WHA.

In the future, if the condition of forest stands within the WHA or UWR necessitates access or another form of management response, there is an exemption process available that would qualify and facilitate the appropriate responses. This exemption process provides the best opportunity to apply the most modern knowledge to assess the potential impacts that the exemption activity could have on the local caribou herd as well as on the forest. Please note that emergency wildfire management activities can be undertaken in an area without following the exemption process whether or not that area is covered by a UWR or WHA.

❖ Suggested Changes

In your comments you have provided two suggestions as follows:

- *A further extension of UWR 7-001 to include the area used by caribou at southern extreme of 7-018; and*
- *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.*

The first suggestion seems to be well founded and an investigation into making this change has been initiated. Shifting the border between the UWR and WHA towards the North would mean that nearly all of the herd's low elevation winter range could be managed within the same legal order. This would appear to simplify future management activities.

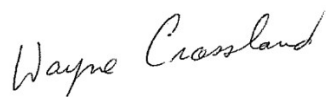
Unfortunately, the second suggestion can not be pursued at this time as it is out-of-scope for these two proposed GAR order, as authorized by the delegated authority for the Ministry of

Water Land and Resource Stewardship. That suggestion, along with your entire response letter and a copy of this letter, will be included in the package of information provided to that delegated decision maker for use when a determination is made on the outcome of each proposal.

This concludes the reply to your Council's comments, but should you require any further information please contact me at your convenience. I do appreciate the time and consideration you have given to these proposals and I hope that my response demonstrates that I have taken your concerns seriously and that attempts are underway to address them appropriately.

Thank you again.

Yours respectfully,



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