

Muskwa Kechika Management Area

Recreation Management Plan

Comparison of Approved and Proposed Plans

General Comments:

Overall the Approved (A) Recreation Management Plan (RMP) and the Proposed (P) RMP are almost identical, except for the inclusion of provisions for the Mackenzie addition. There were some formatting, new headings, and edits to tidy the appearance and clarify some matters, but the overall meaning and intent was not changed. The details are shown in the table below.

Page	Heading	Affected Plan Provision	Comments
6P	Planning Process	A new phase for the Planning Process for the Mackenzie Addition has been added to the proposed plan.	The process for both phases included FN, stakeholder, and public engagement.
16A/11P	Planning and Management Issues and Concerns	The text in the paragraph regarding treaty rights was shortened in the proposed plan. Reference to the Ministry of Sustainable Resource Management and other ministries responsibility re: FN consultation was added.	The overall message was the same, that further work was required to incorporate FN into MKMA planning processes. The Province's responsibilities are a matter of law, but it is unclear what the MKAB responsibilities are. <i>*May want to clarify with MKAB.</i>
11P	Planning and Management Issues and Concerns	New paragraph added to the proposed plan on the Mackenzie addition.	There were some new issues raised regarding the lack of baseline information, lack of implementation strategies, increased access, fishing in sensitive alpine lakes, and permanent CR infrastructure.
17A/13P	Recreation Plan Approval/Enactment	Both refer to a Ministry designation/delegation, but the Ministries are different.	This clause specifically allows for a Minister's order OR a person or class of persons designated by the Minister to approve a recreation management plan.
16P	Planning & Management Principles, Principle 8	Specific reference to the MKAB and the MSRM and other agencies regarding monitoring responsibilities was added.	This adds clarity on the roles and responsibilities. However, Ministry titles have changed, and the current responsible Ministry is not noted. I assume there would be a legal instrument of sorts that would formerly pass responsibilities from one Ministry to another in these types of restructure. <i>*It could be clarified with the MKAB how this could be rectified now, and in the future, i.e. could it just refer to "responsible Ministries/agencies"?</i>
16P	Planning & Management Principles, Principle 11	The proposed plan added a linkage to the LRMPs.	This is useful information, no issue.
18P	Recreation Analysis Procedures	A new section, "Recreation Profile – Values, Current Situation & Assumptions" is included in the proposed plan.	It is explanatory information and does not impact the intent or function of the plan.
19P	FN Values, Traditional Use & Occupancy	A new sentence was added to the section regarding the Province's responsibilities for FN consultation.	As above, the Province's responsibilities are a matter of law and this statement does not impact that in any way. It is unclear the responsibilities of the MKAB and in particular, any duty to engage for MKMA planning processes. <i>*May want to clarify with MKAB.</i>
20P	Current Commercial Recreation	A new sentence regarding the Mackenzie addition was in the proposed plan.	As expected, no issue.

	Activities		
21P	Anticipated Future Public & Commercial Recreation Demand	The wording has been altered, but not the meaning.	No issue.
40P	Minimizing Changes to Ecosystem Components	A new bullet point regarding “meat poles” was added.	No issue, expect that this would have been included as a result of the engagement process.
41-50P	Management Direction for RMZs	A new section on the Mackenzie addition was added to each RMZ	As expected, no issue.
44P	Category I (Small Provincial Parks)	Sikanni Chief ER added.	No issue.
46P	Category II (Large Remote Areas)	A note was added in the proposed plan regarding an alternate access route to the Alaska Highway.	While access management is an important issue, it probably should be dealt with in a more comprehensive manner. Also, it seems more appropriate to include this under the “issues and concerns” sections of the plan. <i>* May want to discuss with MKAB.</i>
50P	Management Direction for RMZs	A new RMZ was included (that only occurs in the Mackenzie addition), that being “First Nations Community Core”	Confirm RMZs with Ian/Gen
53A	Table 4, Factor	“Management Presence” as a monitoring factor has been removed in the proposed plan.	This could be a useful indicator, but there may have been a solid reason to remove. There are numerous other indicators. <i>* May want to clarify with MKAB.</i>
53A	Table 4, Factor	“Signs” as a monitoring factor have been removed in the proposed plan.	Same as above.
64P	Recommendations	New recommendation for a Range Management Plan included in the new.	A recommendation is a reflection of the MKAB concerns, but does not necessarily commit any resources on behalf of the Province. This may or may not be a priority for the Province, given other critical resource management issues in the region/district.
61A	Table 5	This table, the implementation schedule, was removed from the proposed plan.	All of the dates had passed, and more research would be required to understand if the actions had been completed or not. An implementation table (or similar) is useful to have a clear path forward and track actions. <i>* May want to clarify with MKAB.</i>
65P	Plan Review	This section was incorporated into the “Implementation” section, and the review commitment was removed, and reporting is proposed to be done through the annual LRMP reporting.	While rarely achievable, the review provision is good to have in there. Perhaps it could be something like, “when needed” or “if an issue arises”. <i>* May want to clarify with MKAB.</i>
Th66P	Appendix 1	The appendix was expanded to include “individuals involved in the Mackenzie Addition Planning process”.	It’s not clear why the working group was not included in the proposed plan. <i>* May want to clarify with MKAB.</i>
67A/67P	Appendix 2	“Line Agencies” have been amended to reflect the government structure at the time.	They are both out-dated now and do not reflect the current government. <i>* It could be clarified with the MKAB how this could be rectified now, and in the future, i.e. could it just refer to “responsibilities of the Province” (or similar)?</i>
71A	Appendix 3	Access management map was removed.	This is useful information if access management is something that the plan wants to address. It is considered a fundamental component of recreation management. <i>* May want to clarify with MKAB.</i>

71P	Appendix 3	Summary of Park & PA Designations	Explanatory information; can be useful.

Key findings:

- The MKAB's role in First Nations engagement in planning and management processes is unclear. While it does not impact the Province's legal obligations to "consult", the Province may want to clarify this to ensure that FN are appropriately involved in the relevant planning and management processes.
- There are numerous references to Ministries and their responsibilities in relation to recreation management in the MKMA. As these Ministries are restructured, the titles are changed, as are the functions and responsibilities, thereby rendering the plan incorrect. I'd imagine legally, there is an instrument that delegates authorities to the new Ministry, so maybe not an issue.
- The new text regarding an alternate access to the Alaska Highway in the Category II, Remote Areas RMZ is potentially more appropriately placed in the "issues and concerns" section. An "Access Management" map was removed from Appendix 3. This is an important issue and may warrant a more comprehensive assessment in the plan.
- The "Implementation Schedule" and the review provisions were removed from the plan (in the case of review, it was amended from a scheduled review every five years to reporting through the annual LRMP process). This reduces the overall accountability for plan implementation and plan effectiveness, as there is no clear actions and no direct means of evaluating the plan's effectiveness.