



March 29, 2018

Sharon Hadway, Regional Executive Director,
West Coast Operations
Ministry of Forests, Lands and Natural Resource Operations
Suite#103 – 2100 Labieux Road
Nanaimo, BC V9T 6E9

Dear Sharon:

Re: February 2018 Public Consultation on the Proposed Haida Gwaii Community Forest

This letter provides an update about Misty Isles Economic Development Society activities in response to your December 15, 2017 letter inviting us on behalf of the residents of Haida Gwaii to make application for a Community Forest tenure.

During February 2018, Misty Isles Economic Development Society (MIEDS) staff engaged the public of Haida Gwaii in 23 meetings across Graham and Moresby Islands, to understand their perspectives on the invitation by the province to apply for a Community Forest.

The consensus was that there is very strong general support on Haida Gwaii for a community forest. However, it is clear that there is no support for an application from the communities based on a Community Forest as it is currently constructed in your invitation letter. The communities request an extension to the invitation deadline to allow more information and further discussion with you. We are hopeful that discussions will enable an invitation more aligned with community aspirations and needs. The reasons for our response are summarized as follows:

- There is very strong support for a community forest to create greater local control of forest management to supply local contractors and mills and encourage new small-scale value-added

113 Oceanview Drive • Box 652 • Queen Charlotte, BC V0T 1S0
T. 250.559.8050 • Janine@gohaidagwaii.ca • www.mieds.ca



manufacturers. Employment is more valued by island residents than revenue sharing with BCTS. People feel that there is not enough control to direct timber to local jobs and value-added enterprises, with the requirement to partner with BCTS in TSL's that are of the scale that is exported from Haida Gwaii by log barge.

- The offer of 50% revenue return after costs on TSL's is unacceptable. The communities wish to increase the monetary benefits to the communities. This would make a clear demonstration to local government that the agreement will be beneficial in a meaningful manner.
- The requirement for a guarantee of 55,000m³ AAC to BCTS and that any lowered AAC as a result of the new TSR data or community values leading to conservative timber supply modelling will not impact the 55,000 m³, is perceived as unfair and unacceptable. Several options were suggested by the public including having no BCTS partnership, or an even ratio split of AAC, or a partnership in favour of the communities, and/or a re-evaluation of the partnership model and/or transition out of the partnership after five years.
- BC Timber Sales has seriously damaged its social licence on Haida Gwaii and is not regarded by many of the public as a partner of choice for the community forest.
- Opportunities in all of the road accessible units are perceived to be minimal for short to mid-term sustainable harvesting because of the number of TSLs that have been issued since 2012.
- There is not sufficient information/ data to assess the community forest opportunity fully, and the new Timber Supply Review data package is required for independent analysis. That would build public trust and our board's confidence in the Community Forest opportunity. The unencumbered community opportunity in the current offer is perceived to be minimal when considering non-economic units like the Sewell Inlet -Tasu area that were presented and considering the effects of the cedar partition. There are also concerns about whether the community forest is economic after the updated harvesting by BC Timber Sales, spatial constraints, and new Timber Supply Review implications are considered.
- The invitation process did not follow policy (Doug Konkin memo) providing direction on establishing community forest areas. There was no element of negotiation or interest-based discussion.
- The unknown response by the Council of the Haida Nation to the interim tenure provides uncertainty for risk and decision making by communities (MIEDS). The CHN should have been consulted before the invitation was presented to minimize the uncertainty to communities in considering the offer.
- Some public expressed a preference for several community held woodlots rather than a CFA with multiple units.
- Proposals were made to share the removals required to provide a locally managed Community Forest amongst all tenures on Haida Gwaii. Proportionate removals from all licenses to attain a sustainable



harvest managed by the communities for local and island wide objectives would better fulfill the objective of creating local employment without causing unemployment for current market loggers.

- Allow interim sales prior to issuing the community forest agreement that incorporate local concerns to improve social licence, and make all revenues available for community forest development, timber supply analysis on the proposed areas and community benefits.

In addition, there were a variety of specific comments and interests from the public that will provide direction for consideration in a forest management plan.

- Trail infrastructure was proposed from the Spirit Lakes trail to the Crabapple Creek Trail from Skidegate to Queen Charlotte along the ridge.
- Smaller sales 500 to <5,000m³ are desired to lessen barrier of bonus bid requirements.
- Hydrology, slope stability and water quality are concerns in the area of steep slopes behind Queen Charlotte.
- Road maintenance is important to local communities. They would like to see revenues utilized to maintain the road to Gray Bay and other high use sites.
- A higher elevation evacuation route for Masset to the Tsunami muster station through the proposed community forest area was suggested.
- Nomination suggestions were provided for an advisory board that was representative on the expertise and breadth of interests on Haida Gwaii.
- There were requests for satellite/ LIDAR imagery with current harvest inventory and spatial reserves for community consultation.
- There was concern about marine impacts from existing log booming areas on Haida Gwaii and a request for a community forest to utilize the best management practices for dryland sorts
- There were concerns about residual waste on cruise-based sales
- Strong opinions were advocated against off-shore exports and barging logs to Howe Sound and the lower mainland without primary breakdown or value being added on Haida Gwaii.
- There was interest in planning long term road infrastructure instead of fragmented short-term road access
- Community members wanted to see recognition of Haida rights and title
- The public felt that social licence included the responsibility to innovate and deliver on non-timber objectives



Public expressed interest in demonstrating and evaluating the economic feasibility and ecological benefits of single tree selection as well as smaller harvest openings, and greater retention of forest attributes.

- There was interest in retaining more accessible areas of old growth forests for tourism, viewing and educating future generations, as well as non-timber forest values.
- There was strong advocacy for a stronger model of community inclusion and consultation than has been historically done on Haida Gwaii and demonstration of sustainable harvesting on a smaller scale utilizing ecosystem-based management principles.

To summarize, there is very strong general support on Haida Gwaii for a community forest. However, it is clear that there is no support for an application from the communities as it is currently constructed in your invitation letter. The communities request an extension to the invitation deadline to allow more information and further discussion with you. In light of how strongly the residents of Haida Gwaii feel about the ability of the community forest area to sustainably carry the harvest level proposed by the District Manager, we also respectfully ask for an extension of the invitation, until the Timber Supply Review data package is available and can be independently analyzed with results reported back to the communities and public. We also request a more inclusive and transparent process that will allow the evaluation of a variety of options.

We remain concerned about the substantive area withdrawals, deletions, changes in timber harvesting land base, that have been done between iterations of maps provided by the Ministry and that emailed concerns to staff have not been responded to. The Misty Isles leadership feel this tenure offer should be very open and transparent process that will engage the public and increase the trust and confidence in public forest management on Haida Gwaii. We are hopeful that discussions will enable an invitation more aligned with community aspirations and needs.

Sincerely,

A handwritten signature in blue ink, appearing to read "A. Merilees".

Chair Andrew Merilees

Misty Isles Economic Development Society

113 Oceanview Drive • Box 652 • Queen Charlotte, BC V0T 1S0
T. 250.559.8050 • Janine@gohaidagwaii.ca • www.mieds.ca



pc:

Misty Isles Directors, Mayors and Chief Councillors

Peter Lantin, Trevor Russ, Colin Richardson, Council of the Haida Nation

Kerry Grozier, Timber Sales Manager, Chinook Business Area

Minister Doug Donaldson, FLNR

Tim Sheldon, Deputy Minister, FLNR

Dave Peterson, ADM, Rural Development, Lands and Innovation Division

Chris Stagg, ADM, Timber Operations, Pricing and First Nations Division

Len Munt, District Manager, Haida Gwaii Natural Resource District

Randy Aitken, Timber Tenures Specialist, Coast Area Forest Tenures

Janine North ICD.D, Executive Director, Misty Isles Economic Development Society